

Code of Conduct

stc Bahrain

stc

Introduction

What is the Code of Conduct?

The Code of Conduct lays out a company's expectations and guiding principles for highest possible standards of ethical business conduct. Provisions of a code of conduct also provide legal and ethical guidelines for relationships between employees, service users and clients.

Why do we need Code of Conduct at stc?

To clearly outline and reiterate the principles that govern our day to day behavior and obligations by establishing certain non-negotiable rules and instruments available to exercise highest levels of Corporate Citizenship.

Who is the Code of Conduct for?

Our Code of Conduct constitution covers all stc employees and Business Partners who have any kind of business engagement in between.

What are the consequences of not complying?

Non-compliance to the Code of Conduct shall warrant action as per the approved **Code of Violations and Disciplinary Actions**.

How do I raise my concern?

You have several options for raising issues and concerns, you can contact any of the following:

- Your direct line management
- Chief Human Resource Officer
- Head Internal Audit (For Fraud Whistle-blowing)
- Chief Executive Officer

The stc Way of doing business

We set out our core values for how we operate so we can be admired by our customers, the people we work with, and the community we work in.

Obligations

We have ensured that the code of conduct is managed at the highest level within the organization with individuals and committee responsibilities clearly outlined.

- **As an individual**, I shall act in a good faith towards individuals and the company. I shall make sure that I interpret the issues correctly without being provoked or misinformed.
- **As a Line Manger**, I shall be the best guide in case you seek my opinion. I shall stand by my colleagues/team and ensure I advise considering the best for the complainant and the company.
- **As HR Sector**, we are responsible to investigate your concerns and reported violations thoroughly and ensure all your concerns are raised at the right level and with the right set of people. We shall make sure that company rights and employee rights are secured and exercised fairly.
- **As Committee members of the Code of Conduct and Disciplinary Actions** we promise you fair Investigations, up-to-date provisions of Code of Conduct are updated, and we will exercise our responsibilities at the highest level of accountability.

Respect and Non-Harassment

Everyone deserves to be respected regardless of their position, status, beliefs and religious practices of people of all faiths.

We shall strive to provide a work environment that is pleasant, healthy, comfortable and free from intimidation, hostility or other offensive behaviors toward all stc employees, business partners or customers. It is our responsibility to honor and respect the right of others to practice their religious beliefs in freedom. Interference with these rights and freedoms is a violation of the Bahraini Labor Law and this code.

Fair Treatment and Equal Opportunity

We provide equal employment opportunity to everyone. We do not take decisions around people based on caste, creed, relationships, health, sex, social status... etc.

We follow our personnel policies, programs and practices in a non-discriminatory manner. Our employees are our greatest assets and as such, all decisions that directly affect an employee's employment status need to be fair and equitable.

Cultural Diversity

stc is a multi-cultural company; cultural or ethnic identity should not be a disadvantage to community participation or access to services.

We respect the cultural diversity, so we respect and maintain an attire that does not hurt the sentiments or cultural beliefs of our colleagues.

We follow very professional & conservative image whilst representing stc (inside and outside stc premises).

Safety, Health and Environment

We are committed to providing a safe, healthy, productive and comfortable working environment for our employees.

Our aspirations are simple: to achieve zero injuries and work-related illnesses, and to ensure the protection of the environment wherever we conduct our business.

We are following the standards of the Ministry of Health and have trained our employees for emergency health conditions. We participate in regular sessions on health areas and support in sharing information around global health warnings to keep our employees updated.

We are following safety standards of the Civil Defense and take full interest in safety drills. We share our responsibility to identify and report such conditions and hazards that can cause damage to property or safety of our employees.

Office environment is key to our happiness and engagement at workplace. Our responsibility is to ensure our employees and business partners take a positive impression about us and our tardiness. Maintaining peace and calm, maximizing space utilization and ensuring we support others in making this a better workplace is our prime responsibility.

Substance Abuse

We are expected to be in suitable mental and physical condition while at work for the effective and safe performance of your duties.

The use or possession of any intoxicating substance (such as alcohol, non-prescription or illegal drugs) at the workplace, or on stc owned or leased business premises is strictly prohibited, as is the performance of work duties under the influence of these substances.

stc reserves the right to search anyone on stc premises for any of those items and would require employees to undergo a medical test where there is a cause to suspect the use of these substances.

Social and Media Representation

We are committed to communicate responsibly, protect stc's reputation and restrain from any representation that may damage stc's image.

- We have authorized representatives who in their capacity are responsible for all types of communications with the public.
- We exercise responsible conduct when using our personal social media accounts and we are aware that inappropriate conduct can affect stc negatively.
- We always act in a professional and constructive manner and use sound judgement before posting any content on social media.
- We protect the privacy of our organization, its clients and any third party that has confidentially disclosed information to us.
- We never post malicious, misleading or unfair content about our organization, colleagues, competitors or other stakeholders.
- We do not entertain culturally sensitive discussions which refer to Race, Gender, Politics, Government issue, etc. We respect other people's intellectual property including trademarked names, slogans and copyrighted material.
- We engage the relevant departments in validating the published content and we ensure following stc's social media policy.

Conflict of Interest (1/2)

We all have a responsibility to always work in stc Bahrain's best interests and therefore must avoid situations and actions that may constitute, or create the appearance of a conflict of interest.

Conflict of Interest exists when personal interest conflict, appear to conflict, or influence the way individuals perform their job duties, including their duties to act in the best interest of the company.

The simple act of disclosing the possibility of a conflict of interest shall release you from the risk of losing the trust placed in you to act in stc Bahrain's best interests. While it is difficult to identify all circumstances leading to conflicts of interests, the following are examples there of:

- Holding (either directly, or through a relative), a substantial financial interest in any enterprise with which stc has business dealings, or is considering establishing business dealings (e.g. suppliers, contractors, vendors, competitors, customers and licensees).
- Accepting, directly or indirectly, from any vendor or supplier of services, any gifts or entertainment that are described as inappropriate in the Gifts and Entertainment section of this code;
- Engaging in outside activities that may adversely affect your impartiality or judgement or that may interfere with or adversely affect your ability to perform your official duties;

Conflict of Interest (1/2)

- Engaging/managing a contract in which an employee has an interest.
- Any decision making, part of a business committee involving a spouse/relative/direct family member – shall lead to the committee member being excluded from the decision-making process.
- Employees wishing to carry on a private enterprise will need a no-objection letter from the company before committing to any such engagement. Company may grant no objection letters where it is clear that no potential conflicts exist, and the enterprise will not affect the ability of the employee to fulfil his or her job. Entering into a second employment is prohibited, however voluntary services are allowed subject to obtaining a NOC.

Bribery and Corruption (1/2)

We will never use unlawful and unappropriated means to get our business, We will strive to be chosen for business more on our competitive edge and quality than anything else.

Bribery

- Bribery is a form of corruption. We do not engage in offering, giving, receiving or soliciting of any item of value to improperly influence the actions or decisions of an official or other person with official duties.
- We do not offer or ask for anything of value, including any service, gift, job or entertainment; nor accept any gifts, bribe or anything of value, whether directly or indirectly from any person, in order to unsuitably influence official acts and decisions or to obtain or maintain any privilege to any company or person.
- The prohibition includes payments made to officials to secure or speed up routine legal government actions, such as issuing permits, visas or releasing goods held in customs, unless these payments are made in accordance with an official pricing list of the government department.

Bribery and Corruption (2/2)

Gifts and Entertainments

- Gifts includes anything of value, provided to an individual or members of their family, including cash and non-cash items such as artwork, equipment, preferential discounts, loans, favorable terms on any product or service, prizes, donations, participation in stock offerings, home improvements, tickets to recreational activities, cultural or sports events, and gift certificates. Courtesy 'entertainment' includes meals, invitations to attend recreational, cultural or sports events, and any associated travel, accommodation, meals and refreshments.
- Gifts and entertainment valued at less than BD 30, and of a promotional nature endorsed with a corporate logo such as greeting cards, thank you notes, calendars, diaries, pen sets, calculators and similar items can be accepted, without the need to declare them.
- If any gift or entertainment valued at over BD 30, from vendors, contractors, suppliers, service providers, etc. is to be declared to line manager then to HR. If we are in any doubt about whether the item is below BD 30 in value, we shall declare it to avoid any breach to the code of conduct.

Accurate Information and Reporting

There is no deliberate attempt to hide or manipulate the information for business use or to misguide anyone.

- All information whether financial or non-financial, and whether paper or electronic, must accurately reflect our transactions and events.
- Financial data (e.g., books, records and accounts) must conform to International Financial Reporting Standards, and other relevant generally accepted Accounting Standards.
- We never make a false or misleading entry in a report, document, record or expense claim.
- We make sure that other information (e.g., Safety, Health or Environmental, HR records, quality data, regulatory filings and other essential company information) are maintained as accurately as possible.
- We fully co-operate with Internal Audit, providing them with accurate information on request.
- We provide information in connection with a government or regulatory agency enquiry or investigation; make sure that any information provided is truthful and accurate, and that stc's legitimate interests are protected.

Fraud and Misuse (1/2)

We will always act honestly and with integrity, and safeguard those of stc's assets and resources for which we are responsible.

Fraud and Theft

Fraud and theft are violations of the law and of this Code. Types of fraud and theft include but are not limited to:

- Theft of assets.
- Signing, cancelling, creating, destroying or amending documents by fraudulent means.
- Knowingly authorizing or receiving payment or reimbursement for goods not received, expenses not incurred, or services not performed.
- Assuming a false name or capacity.
- Disposing of property without being authorized by its owner.
- Reviewing and/or forwarding confidential files without appropriate permission.
- Making false claims to qualifications and experience.
- Misappropriation of funds or assets, ex: Budget or expenses including petty cash, etc.
- Deliberate misinterpretation of information.
- Unauthorized use of stc or contractor manpower, vehicles and equipment.
- Attempts to conceal any of the above.

Fraud and Misuse (2/2)

Misuse of Assets

We realize the responsibility towards the company and our assets. We ensure that stc's property is not damaged, misused or wasted.

Whistleblowing

It is our duty to report any wrongdoing and report any inappropriate transaction to minimize the damage to reputation and risk to the company.

There is a complete process and guidance crafted around whistleblowing and reporting in appropriate business. A suspicion shall be registered immediately if you suspect that a fraud has been committed or is leading to a potential fraud.

In line with the Fraud Whistleblowing policy in stc all fraud related cases shall be reported directly to Head of Internal Audit in person, or through phone on 34011611, or via email: fraudwhistleblowing@stc.com.bh (accessible only by Head of Internal Audit).

We should co-operate fully with whoever is conducting internal checks, reviews or fraud investigations. stc will not tolerate retaliation against those that raise concerns in good faith, even if the concern turns out to be unfounded. Your identity will be kept discrete and will not be disclosed without your consent.

Confidentiality and Information Control (1/3)

We treat our data/information around employees, business partners, customers, and operations with highest level of confidentiality and understand the need and circumstances under which this information can/should be shared.

Our employees are often placed in positions of trust in which they are exposed to or have access to employee payroll data, personnel records, vendor and service contracts, operational data, license agreements, financial information and other types of sensitive information that is considered confidential or personal in nature.

Protecting our Knowledge

Whether a current or a former employee, we are governed by the covenants of confidentiality in our employment contract, and that revealing any type of confidential or sensitive information is a violation of that trust.

We shall not release any communications, documents or information that could in any way be considered as sensitive.

Confidentiality and Information Control (2/3)

Personal Information

When sharing personal information with those outside stc Bahrain, we must obtain prior authorization to do so from our line manager. In order to ensure the accuracy and objectivity of information concerning current or former employees, we are required to refer any calls or written requests to release information such as personnel, medical and other records, to the HR Sector. Information is to be retained and disposed of, in accordance with stc's Confidentiality Undertaking.

Customer Information

Customer data, including a customer's telephone number, residential address and details of call history, may be sensitive in certain circumstances and of value if used for illicit purposes. We shall therefore ensure that data relating to customers are properly protected from misuse otherwise the reputation of the company will be tarnished by dishonesty and corruption.

Confidentiality and Information Control (3/3)

Copyrights or Confidential Information of others

We do not bring to stc any confidential documents, including computer records, from prior employers, or share information relating to prior employers that is confidential. We do not knowingly infringe a valid intellectual property right of another party

IT Information and Access Control

The IT system belongs to the company, and should be used solely for stc's purposes. In giving our employees and authorized business partners access to systems and technology, we expect them to be responsible in its use.

We must comply with stc's IT policies, and be careful not to be involved in unauthorized actions such as:

- Accessing or attempting to access data or files of others held on their PCs or directories.
- Tampering with software or hardware.
- Illegal downloading or copying of copyrighted software.
- Releasing of confidential data or sharing of confidential information with others.
- Attempting to intrude or hack into stc's IT Network, computers or PCs.
- Unauthorized use, sharing or disclosure of user ID's and passwords.