

Salama Fikira - Group

Business and General Conduct Policy

Date of Most Recent Change	Details of Change
18 Jan 2022	Change to new SF-Group Template.
23 May 2023	Annual review.

Contents

1. Introduction 4

1.1. Appearance and Dress 4

 1.1.1. Office Wear 4

 1.1.2. Field Wear 4

2. Identification 5

3. Professional Conduct 5

4. Communication and Availability 5

5. Transaction of Private Business 5

6. Outside Interests and Employment 5

7. Anti-Trust and Competition Law 5

8. Personal Relationships 6

9. Confidentiality 6

10. Political and Civic Activities 6

11. Bullying and Harassment 6

12. Security 7

13. Environment 7

1. Introduction

Employees/Consultants should at all times conduct themselves in such a way as to enhance the reputation of the Company.

SF will support employees/consultants who become aware of and are willing to report breaches of this policy or who genuinely believe that a breach is occurring, has occurred or is likely to occur within the business. Employees/Consultants should raise the issue with their manager, team leader or directly to senior management.

These standards of conduct are intended to underpin and clarify standards required by the Company of its employees/consultants and form a fundamental part of the employment/consultancy contract. Employees/Consultants who fail to comply with the guidance detailed in this Policy could be subject, following full investigation, to disciplinary action up to and including dismissal. If through their actions or omissions employees/consultants are found to be in contravention of either this Policy or, indeed, their legal responsibilities then the Company reserves the right to take legal action if it deems it to be necessary to do so.

This Code is not intended to provide detailed guidance about compliance with every local legal requirement in the many different countries in which we operate. Each individual is responsible for knowing and following the laws that apply to the place or country in which they work. Where differences exist as the result of local customs, norms, laws or regulations, you must apply the highest standard of behaviour, whether contained in this Code or as a local requirement. If you are in any doubt, you should seek your team leader's or manager's advice at the earliest opportunity. We strive to comply with the laws, rules, regulations and export control laws and sanctions of the jurisdictions in which we work and to co-operate with routine government and regulatory enquiries and investigations. If you are subject to any such enquiry, you should notify your team leader or senior management before responding. We respect local customs and culture and seek to develop lasting relationships in the communities in which we work.

1.1. Appearance and Dress

1.1.1. Office Wear

When working in SF's or client's offices individuals should be smartly presented in clothing appropriate for the environment in which they are working.

While working in the SF's office it is accepted a more casual appearance may be accepted, however individuals should be aware that unannounced client visits can happen at any time and so a business like appearance should be maintained.

1.1.2. Field Wear

From the moment you leave your house on task you are an ambassador for SF. The image you present when traveling and on assignment is important to us. Please always dress neatly and conservatively and do not draw attention to yourself in any way. Do not wear or carry anything which could be considered "military".

When you embark or start your assignment you must present the company image. We request that you wear your uniform and the required PPE (which maybe client specific).

It is essential that you wear PPE when required or when you believe it is appropriate.

All consultants must maintain a high standard of dress and appearance. Uniforms will fit properly; trousers, pants, or skirts should not fit tightly; and clothes and uniforms must be kept clean and presentable. You will maintain good personal hygiene and grooming on a daily basis.

2. Identification

When issued, SF identification should be carried at all time when in the office or on task.

3. Professional Conduct

Act in a professional manner throughout and always be polite. It is essential at all times that you act in a courteous and professional manner. The client should be treated with the utmost respect.

Should an incident occur where you feel intervention needs to occur you should speak to your Team leader who will channel correspondence with the client himself or through head office.

Employees and Consultants should pay particular respect to observing clients rules of command on board and in their offices.

4. Communication and Availability

It is extremely important that you keep the operations team accurately updated to your availability and it is vital that you are contactable at all times.

5. Transaction of Private Business

Employees and Consultants having official dealings with contractors and other suppliers of goods or services must avoid transacting any kind of private business with them by any means other than the Company's normal commercial channels. No favour or preferences as regards price, or otherwise, which is not generally available, should be sought or accepted

6. Outside Interests and Employment

Outside interests include directorships, ownership, part ownership or material shareholdings in companies, business or consultancies likely to seek to do business with the Company. These should be declared to the individual's line manager as should the interests of a spouse / partner or close relative.

Do not engage in activities which may be perceived as conflicting with your duties as an employee or consultant. A conflict may arise where personal interests are at odds with those of our business. If you are in any doubt as to whether a potential conflict exists (concerning you or a third party), you should disclose it immediately to your manager. The activities of close relatives can create conflicts of interest, too.

Whilst we cannot provide a complete list, some potential conflicts could include:

- accepting commissions, gifts of more than a nominal value, excessive hospitality, loans or
- other favourable treatment from any supplier, customer or competitor of the business
- benefiting from the sale, loan or gift of any property held by the business
- failing to give the company the opportunity to benefit from a relevant business opportunity and seeking to benefit personally by directing it elsewhere
- deriving any direct or indirect benefit as a result of any contract entered into by any member of the group

7. Anti-Trust and Competition Law

Employees undertake they will comply with Anti-trust and Competition law (Competition Act 1998 (UK)).

In particular employee agree not to work with competitors to price fix or divide up customers, accounts or markets They also will ensure that competitively sensitive information is not shared.

All employees will receive annual training in anti-trust and competition law and those employees identified as at risk in the company's Strategic Risk Assessment will receive additional online training.

8. Personal Relationships

If a personal relationship between two employees/consultants develops within the working environment, the onus is on the senior employee/consultant concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise. The Company reserves the right to move one of the employees/consultants concerned if it deems it necessary to do so.

9. Confidentiality

Employees and Consultants, having signed a non-disclosure agreement, must be aware of the fact that confidentiality is crucial, not only to the company but to the client as well. Therefore, employees and consultants are not permitted to contact the client directly unless authorised by SF.

Employees/Consultants must not seek employment or reward from clients as it compromises the client's ethics and causes a conflict of interest. If in any doubt regarding this matter, it would be courteous and commercially sensible to, in the first instance to contact our head office and speak to the General Manager or Managing Director to discuss any issues. At all times confidentiality must be maintained. No information can be released to unauthorised persons or organisations

10. Political and Civic Activities

It is not the intention of SF, or this policy, to dissuade employees/consultants from participating actively in public duties. It is important, however, that by doing so there is no suggestion to a third party that the employee is acting on behalf of, or with the support of, SF. To avoid any misunderstanding, no Company employee should permit his or her company affiliation to be noted in any outside organisation's materials or activities without the express written approval of a member of senior management. Salama Fikira will not engage in party political activity or make any political contributions (in cash or in kind).

11. Bullying and Harassment

We are committed to providing a working environment which is free from harassment and intimidation. Harassment is defined broadly and covers any conduct which is regarded as unwelcome or offensive by the recipient and which adversely affects an employee's/consultant's dignity. It may include comments of a racial or tribal nature.

Sexual harassment is conduct towards another which is of a sexual nature or based on a person's gender, which is regarded as unwelcome or offensive by the recipient.

We will not tolerate the harassment of our employees/consultants and whilst we encourage issues to be resolved on an informal basis, we will fully support any employee/consultant who, in good faith, reports unacceptable behaviour to us.

Complaints regarding sexual harassment should be made in writing to your team leader, manager or human resource manager and will be fully investigated under the relevant grievance procedure. It is a disciplinary offence

(for which an employee/consultant may be dismissed summarily) to victimise or retaliate against someone who makes or assists with the making of a harassment complaint. All complaints regarding sexual harassment shall be treated as confidential and the identity of the complainant will not be disclosed except where disclosure is necessary for the purpose of investigating the complaint or taking disciplinary measures in relation thereto.

12. Security

SF aims to provide a safe working environment for all those who work with us and we protect our assets against fraud, misuse and other illegal activities. You must take every care with the Company's property and should never disclose or misuse our intellectual property or other confidential information. The Company's physical assets, intellectual property rights and information must be handled with care to avoid loss, theft or damage. Company assets should be used for business purposes. Limited personal use is permitted provided it is not in conflict with the interests of the Company, this Code or the Company's rules and policies.

We regularly produce valuable business information referred to as 'intellectual property'. Intellectual property includes patents, copyrights, trademarks and service marks, other kinds of confidential business information like sales, marketing or other corporate databases, marketing strategies and plans, research and technical data, business ideas, processes, proposals and strategies, new product development, software bought or developed by the Company and information used in trading activities including pricing, marketing and customer strategies. Unless required for the proper performance of your duties or at the Company's request, you must never disclose any of our confidential intellectual property or other confidential information. This applies throughout your employment and continues after your employment ends. If you do need to share our confidential information with someone outside of our business, you must obtain your manager's prior approval and check whether you should have the third party sign a confidentiality agreement prior to the disclosure.

Equally, you must not use or disclose the intellectual property or confidential information of others without their and our prior consent.

13. Environment

We conduct our operations in accordance with all legal and other requirements in order to minimise any negative environmental impact and we maintain a target of zero environmental incidents.

Signed and dated.

A handwritten signature in blue ink that reads 'Crispin Kennedy'.

Crispin Kennedy

Director

SF Group

23 May 2023