

stc

stc code of conduct policy

1 purpose:

stc (the company) believes in its vision “ we are a world-class digital leader, enabling the digital transformation of the MENA region, by providing innovative services and platforms”. The company maintains the highest ethical standards in the implementation of its business, and requires all who works in stc to implement its values (Dynamism, Devotion and Drive), with the aim of flexibility in work, innovation, building trust and creating a distinct professional culture that suits the company’s position and the importance of its leadership role in the Saudi society and the national economy and what is reflected positively for the society, taking into account the provisions of the laws and regulations in the Kingdom.

2 scope:

This Policy applies to any person who works for stc in any capacity including members of the Board of Directors, members of its Standing Committees, all stc employees, contractors, temporary employees, suppliers, and any other stakeholder dealing with the Company in a material way under Kingdom of Saudi Arabia Legislations and Regulations.

3 policy administrator (owner):

stc Board of Directors.

4 responsibilities:

- 1.4. stc Board of Directors is responsible for preparing and reviewing this Policy and to ensure that all members of the Board and its Standing Committees’ have reviewed this Policy.
- 2.4. The Board Secretary is responsible for publishing this Policy and bringing in the notice of all members of Board of Directors and its Standing Committees for reviewing and ensuring of this Policy.
- 3.4. All entities mentioned in Section 3 above are responsible for compliance with all related commitments and obligations.
- 4.4. Each person who works for the Company, including Board of Directors members, and all the Company’s employees, contractors, suppliers, and whomever in its behalf or represents it for others with what stated in this Policy.

5 definitions:

As per Corporate Governance Document, following are the definitions of key terms used in the document:

- 1.5 The Company: stc.
- 2.5 Executive Committee/Executives: Chief Executive Officer, Senior Vice Presidents, Vice Presidents, and General Managers.
- 3.5 Employee: The person who executes the assigned tasks and responsibilities according to the approved organizational structure, and commits on executing the policies and decisions under the regulated laws, and it includes male/female.
- 4.5 Employees of the Company: Each person who works for the Company from Board of Directors’ members and its Standing Committees, STC employees, contactors, temporary employees, and any other stakeholder dealing with the Company in a material way under Kingdom of Saudi Arabia Legislations and Regulations.

6 references:

- 1.6 Kingdom of Saudi Arabia Legislations and Regulations.
- 2.6 stc Work Regulations Bylaws.
- 3.6 stc Conflict of Interests Policy.
- 4.6 stc Whistle Blowing Policy.

5.6 stc Anti-fraud and Corruption Policy.

6.6 stc Purchasing Policy.

7 policy statement:

1.7 the company shall commit to:

- a. Respect the importance of each individual (employee, contractor, suppliers, service providers, others) vis a vis his value and beliefs.
- b. Provide a suitable work environment based value and principles ensuring complete transparency and trustworthiness while implementing all its approved policies and procedures.
- c. Make sure for everyone to follow the standards regarding environment, health, and safety.
- d. Evaluate the employee with regard to his career path on the basis of his capabilities, merit, and competitiveness, while providing him equal opportunities to his/her performance.
- e. Provide suitable training and improvement opportunities for the employee during their career path.
- f. Provide opportunities for reasonable and decent debates and fair freedom of expression within the work environment.
- g. Encourage the spirit of creativity and innovation and provide opportunities for employees to participate in presenting creative and innovative suggestions regarding the improvement of Company's operations and services.
- h. The Company shall ensure that employees have the right to challenge or complain against any decision through well-advertised and monitored channels and processes within the Company.

2.1.7 members of the board of directors shall:

- a. Commit to follow the related charters, rules and regulations that governs and regulates the practices, behaviours, and the relationships that regulates the interactions between members and the Company.
- b. Show utmost loyalty towards the Company regarding Company's interests, growth, and value, as well as putting the Company's interests over his own or any other party.
- c. Ensure to safeguard Company's interests as well as protecting the shareholders' rights and interests.
- d. Use the Company's assets and resources for achieving the Company's purposes and goals, and not using such assets and resources for achieving a personal interest.
- e. Keep secret of the internal information of the Company and not disclose such information to any person except within the limits stated or allowed in the regulation.

3.1.7 the company's employees shall:

- a. Perform his/her duty of care and loyalty and development towards the Company.
- b. Keep and enhance the reputation of the Company by demonstrating the proper values and ethics.
- c. Not use his/her position in the Company for the purpose of achieving personal goal for self or others.
- d. Perform his/her tasks and duties with responsibility and efficiency in accordance to the best practices within a prescribe time limit, and through the working hours honestly, accurately and professionally, while following the related regulations, charters, policies, and work procedures, with continual improvement as a key objective in mind.
- e. Devote to the official and assigned official duties, and shall not indulge in any activities not related to his/her roles and responsibilities, unless authorized by the competent authority.
- f. Perform tasks or duties to the best of his/her abilities outside the official working hours in case of extraordinary circumstances where it is deemed necessary by the employer without contravening any applicable Labor Law.

- g. Cooperate and help with any investigation and inspection undertaken by any competent authorities, in every possible way including but not limited to providing information, answering questions and cooperating with the investigators and inspectors according to the work regulations and policy.
- h. Not do disclose any technical, commercial, and industrial secrets for the services he/she provided or helped in providing directly or indirectly in addition to any other corporate secrets related to the work or the Company.
- i. Take required care of the machines and tools and resources owned by the Company and placed under his/her responsibility and care and shall return the Company the unused materials.
- j. Refrain from any activity that violates the general ethics and behaviors, or any behaviors or activities that contradicts Islamic Sharia, including offending and incitement against any of religious beliefs of others inside the workplace or outside.
- k. Have respect for one another and to consider each other work partners while collaborating to complete tasks on the basis of efficiency and expertise sharing.
- l. The basis of dealing and communicating between the employees shall be without exception or preference or shortage, judged by the Islamic teachings and respect traditions and cultures, and according to the nature of the work.
- m. Refrain from any unethical, negative and harmful activities including but not limited to (exploitation, blackmail, physical and emotional, sexual harassment, etc.) in any way whether by act, verbal, or by indication.
- n. Refrain from the exploitation of any information of the employees' personal lives with the intent to harm them.
- o. Behave with decency and honesty and shall also refrain from harmful arguments, curses, envy, scandals, gossips and other acts of similar nature.
- p. Abstain from rumors and cursing and does not publish negative messages or any that disrupts the employee's reputation as well as the Company's.
- q. Refrain from agitating himself of herself or inciting the employees for any agitation against the Company's policies or decisions.
- r. Refrain from using social media to discuss the Company's daily tasks and workflow or disrepute the Company or its employees, any relevant improvement or remedial and suggestions shall be made through the available means of communications within the Company in a professional manner.
- s. Report promptly through available channels within the Company about the cases that violates the Company's charters and policies.

4.17 contractors and suppliers and their representatives shall:

- a. Safe keep and never disclose any direct or implied Company's technical, commercial, and industrial secrets directly or indirectly and all the professional secrets related to work or the Company.
- b. Follow any and all approved regulations and policies and purchasing procedures in the Company.
- c. Commit to supplying the Company when needed while maintain the agreed levels of quality, trust, price, service, time, and any other commercial terms or specifications.
- d. Refrain from presenting gifts, tips or extending invitations to meals or entertainments events directly or indirectly for work provided, or the promise for a service or any promise of preferential treatment.
- e. Maintain the Company's reputation.
- f. Report through the available channels about conflict of interests cases or any other cases that needs disclosures.

2.7 work Environment and Ethics:

STC shall provide a safe and healthy work environment that aligns with the related regulations and charters and does not contradict with the Islamic Sharia, and safeguards the career and contractual rights of employees according to the concluded contracts. Company shall also promote and ensure professional behaviors in order to help on provide a safe, creative, healthy, and fun social work environment, that will encourage on respecting and maintaining the Company's interests and reputation, and in order to achieve this the employees must commit to the following:

2.1.7 Respect:

Each individual deserves the necessary respect and a fair treatment regardless of any considerations. The Company encourages its employees to follow the decent behaviors when dealing with one another and not underestimate, insult, or disturb each other physically or verbally.

2.7.2 Privacy:

The Company shall respect the privacy of its clients and every person that works for the Company and it sets rules and policies that prohibits others to look up for the personal information of any stakeholder by unauthorized individuals.

2.7.3 Human Rights:

The Company shall honor and respect all its employees, and let them work by their own freewill without force. The Company shall support all approved human rights policies and regulations sanctioned by the Kingdom of Saudi Arabia.

2.7.4 General Appearance:

The employees shall consider the following:

- a. Stay well dressed with an appropriate and professional appearance.
- b. Take care of the general cleanliness.
- c. Wear the official uniform required by the nature of work and according to the instructions issued by the Company.

2.7.5 Women's Work Environment:

The Company shall provide a suitable work environment for women according to the related rules from the competent authorities and without prejudice to Islamic Sharia.

2.7.6 Company's Resources and Properties:

The care to protect the Company's resources and properties including but not limited to:

- a. Use the Company's resources to achieve its goals.
- b. Abide by the safety regulations inside the Company and does not neglect and expose such properties to the danger of fire or damage.
- c. Ensure protection of computers and prohibiting unauthorized uses.
- d. Shall not use the Company's name, identity, and brand for personal reasons.
- e. Shall use Company's equipment and office tools for the Company's activities only.
- f. The use of the official worktime to achieve Company's activities.
- g. Protect the Company's assets from theft or destruction and to report to security management in the occurrence of such cases.

2.7.7 Selling products and Providing Services:

Employees shall show its products and services and present them in a professional manner, ensuring not to mislead the client in and taking a wrong decision while fully disclosing the facts related to the services and selling terms and conditions and providing the services.

2.7.8 Selecting Suppliers:

Company employees to commit to abide by the approved regulations, policies and procedures that regulates such activities as mentioned in the Purchasing Policy No PY-0-606321-03.

2.7.9 Transparency:

The Company and all its employees shall commit to the following:

- a. Follow policies and procedures for suitable disclosure that enables shareholders and stakeholder to review the Company's information.
- b. Ensures that the Company's website shall include all disclosed information, and any other statements and information published through other means of disclosing stated in its executive regulations and charters.
- c. All disclosures shall be accurate and timely as required by the applicable rules and regulations.
- d. Facilitate the employees to communicate freely, and to encourage them not to hide any information related to their tasks while complying with the Company's policy and charter frameworks.
- e. Setting suitable procedures that limits the effects of rumours and promoting them, as it shall prevent misunderstandings.

2.7.10 Effective Listening:

The Company and all its Employees shall:

- a. Find effective channels for communicating mechanisms between the employees and the Executive Committee in order to facilitate effective and efficient conflict and issue resolution.
- b. Provide opportunities for employees to ask questions and to express their opinions without fear, repercussions. Encourage the employees to provide operational and capital cost saving suggestions to suggest better ways of performing their jobs.

3.7 roles and responsibilities:

3.7.1 Board Secretary shall be responsible for:

Publishing this Policy between Board of Directors members and its Standing Committees for compliance.

3.7.2 General management of the Human Resources shall be responsible for:

- a. Publishing this Policy for the Company's employees and enables them to review it.
- b. Ensures all Company employees sign the non-disclosure agreement for this Policy.

3.7.3 Procurement Performance and Operations shall be responsible for:

Publishing this Policy to all Company's Suppliers and Contractors, for review and compliance.

8 penalties

In the case of non-complying with this Policy the Company has the right to impose the approved punishments and penalties according to the Company's regulations and policies, with the Company's right to resort to the Competent Governmental Entities if the violation is considered a criminal offense as the Company's penalties does not stop the victim's right to resort to the Competent Governmental Entities and impose an additional penalty.