



Code of Business Conduct & Ethics

1 INTRODUCTION

Asiacell's "Code of Business Conduct & Ethics" sets out business principles and guidelines on how to act and conduct business practices within Asiacell Communication PJSC (The Company), and explains how they apply in practice to every Asiacell employee.

Asiacell employees should never violate the Code (or other policies, or applicable government laws & regulations) even if superior directs employees to do so. Any violation to the code of business conduct & ethics will result in disciplinary actions.

1.1 Expectations

All Asiacell employees, with no exception, must comply with the "Code of Business Conduct & Ethics", as well as other policies and applicable government laws & regulations and It is expected from employees to

- Read, understand and comply with the Code.
- Read and understand job description.
- Be a good ambassador in representing Asiacell at all time, on and off duty.
- Always act and conduct business practices in the best interest of Asiacell.
- If unsure about any element of the Code, or in doubt about any course of conduct, ask for guidance from line manager or from HR.

1.2 Government Laws and Regulations

Asiacell, is obliged to run the business according to applicable government laws and regulations, including of local, regional and central government. It is employee's responsibility to ensure any business practice that is undertaken is not in violation of any government laws or regulations.

2 REPORTING AND INVESTIGATIONS

Asiacell employees can ask questions, obtain information and seek guidance on "Code of Business Conduct & Ethics", or other policies, or government laws & regulations through line manager and also have open channels to raise their complaints as per HR Grievance Procedures and Instructions.

2.1 Reporting

Any employee may report perceived or actual violations/wrongdoing/misconduct on a confidential basis to internal audit as per the whistleblowing procedure.

2.2 Investigation

Asiacell takes all verified reports of Code violations and potential violations seriously and is committed to conducting investigations thoroughly and impartially. Any concerns or misconducts that are received by Internal Audit will be dealt with according to the nature of each case.

2.3 No Retaliation

Retaliation against any employees who raise a misconduct or a concern, or who participate in an investigation is prohibited and regarded as violation of the Code.

Any employee who reports a misconduct or a concern, or participate in an investigation must be treated with dignity, and cannot be subject to adverse employment actions, including dismissal, suspension, demotion, discrimination, harassment, threat or loss of company benefits.

In case the employee who made the report is proved to be a party in the activity, an appropriate disciplinary action against him/her will be made, taking into account his/her voluntarily reporting the violation.

3 USE OF ASSETS

The Company's Assets should be used for the benefit of the Company in conduct of its Business. All personnel have a responsibility to safeguard and use Asiacell's property. The Assets include, but are not limited to, Company funds, information resources (like computer hardware, software and data), financial and operational records, Internet access, emails and Telephone services, personal information, records, systems, accounts details) due to having significant number of users, employees, vendors, suppliers and business partners. Extra care must be put in place by employees who are involved in the handling Information Assets to ensure adequate level of protection and security are put in place at different phases of Information Assets lifecycle. Necessary security protection must be put in place to safeguard Information Assets.

4 RELATIONSHIP WITH EXTERNAL STAKEHOLDERS

It is believed that business relationships founded on trust and mutual advantage – where both sides benefit – are vital to success. Asiacell will strive to create mutual advantage by understanding the needs of customers, vendors, suppliers and business partners and conducting ourselves honestly, responsibly and fairly.

Employees who are directly involved deal with external parties and/or in the selection of business providers for Asiacell, including suppliers, vendors, agents and business partners, must use good judgment. The selection process must be per applicable approved procurement policy.

4.1 Handling External Communication

Asiacell has designated different employees to handle different communication matters of the company, including Public Relations, Media Relations, Investor Relations, Human Resources, and Government Relations. Therefore, unless employee is authorized per job role, or have prior written authorization from CEO and Chairman, may never;

- Speak to media on behalf of Asiacell.
- Make any comment on social media on behalf of Asiacell.
- Use Asiacell name, logo or brand for anything other than the company's business identity specifications.
- Answer queries regarding current and former employees.
- Respond to court orders, criminal inquiries, outside attorneys, legislative bodies or regulatory agencies.

4.2 Court Orders and Other Legal Documents

If employee receives any correspondence (digital or physical) related to court orders or legal matters, he/she must direct it to related departments; court orders to Court Affairs Department, and legal correspondence to Regulatory & Legal Business Unit. Failure to do so may result in disciplinary action as these types of correspondence are urgent, confidential and legally binding that could result in Asiacell being exposed to legal procedure.

4.3 Customers

Asiacell believes that its business exists because of customers and therefore customers' satisfaction is a paramount to the success of business.

Good customer service can change the perception customers hold towards the company, and could play a big role in revenue generation for the company.

Asiacell employees who are dedicated to serve customers, including via telephone, email, social media (e.g. Facebook, Twitter, LinkedIn), and face-to-face, have the extra responsibility to ensure quality service is provided that is satisfactory and as per customer care department approved policy and procedures.

4.4 Communities and Societies

Asiacell is responsible members toward communities and is dedicated to doing its business ethically, honestly and transparently. Asiacell will work towards improvements that are measurable and contribute to the real and sustainable growth of communities.

4.5 Environment

Asiacell is committed to doing its most to minimize its impact on environment by producing less harmful emissions, including waste, air emissions and harmful discharges to water. In addition, the company will do its most to minimize the use of water, energy (e.g. electricity, gas, and fuels), and raw materials. Asiacell is committed to complying with all applicable environmental government laws & regulations, and expect its employees to adhere by them.

5 INTEGRITY AT WORK

5.1 Diligence at Work

All employees must act and work as one team for the benefit of Asiacell. It is the responsibility of all employees (with no exception) to ensure Asiacell business is run continuously, adequately and in a timely manner. It is employees' obligation to ensure responding to all digital and physical correspondences including emails, phone calls, letters and messages, sharing knowledge etc.

5.2 Diversity, Equal Opportunity without Discrimination and Harassment

Asiacell, values the diversity of employees, users, suppliers, vendors and business partners and it is providing equal opportunity to everyone regardless of their race, skin color, religion, belief, age, gender, nationality, disability, marital status or any other protected category under applicable law.

Asiacell has zero tolerance for discrimination, bullying, sexual harassment or any other harassment based on race, skin color, religion, belief, age, gender, nationality, disability or marital status. Asiacell is committed to abiding by all government laws & regulations in these regards.

Anyone who found to have discriminated or bullied or harassed others, including Asiacell employees, customers, vendors, suppliers, and business partners, will face serious disciplinary action.

5.3 Workplace Environment

Asiacell is committed to providing a workplace environment for its employees that is healthy, safe, secure, and according to requirement per government laws & regulations. Employees must follow applicable company policies and procedures while on Asiacell premises.

Asiacell strives to maintain a work environment that is free from violence, and encourage to establish mutual work relationship with colleagues, based on respect that is conducive to good work performance. Asiacell has zero tolerance for violence, fighting, threatening, malicious behavior, intimidation, abusive behavior and offensive language.

Anyone who gets involved in any violence or carry any illegal weapon on Asiacell premises or while on duty will face serious disciplinary action.

5.4 Alcohol and Illegal Drugs

Using, dealing and possessing alcohol or illegal drugs are prohibited on Asiacell premises or while on duty. Asiacell is committed to maintaining a safe work environment for its employees on its premises, or while operating its equipment and vehicles.

Any Employee who found and proven to be under the influence of alcohol or any illegal drugs will face disciplinary action.

5.5 Smoking

Smoking is prohibited on Asiacell premises unless in designated smoking areas that are allocated by Asiacell on its premises.

6 CONFLICTS OF INTEREST

Conflict of interest arises when personal and business interests come into conflict. This could be in a way which employee's personal activities and relationships prevent or limit ability to act in the best interest of Asiacell.

Employees must ensure that;

- Never put the interest of Asiacell business in jeopardy because of personal or other interests.
- Never let personal interest interfere while selecting a vendor, supplier or business partner on behalf of Asiacell on the basis of personal relationship or interest, but the selection rather must be on the basis of best interest of Asiacell and its business as per procurement policy.

- Never recruit someone on behalf of Asiacell because of personal relationship with them (e.g. family, friend, relative), recruitment should be based on qualifications, abilities, experience, knowledge, and skills.
- Declare any interest with vendors, suppliers, business partners, competitors or customers of Asiacell, or anyone else who has business interest or contract with Asiacell. This interest could be in the form of investment, operational activities, or relationship.
- Never have financial interest in a company due to discretionary authority to deal with as part of job role with Asiacell.
- Never intervene in the business of another department / section of Asiacell or take decision on behalf of them for personal interest.
- Do not use Asiacell's business contracts and agreements with vendors, suppliers or business partners for personal interests, including financial and non-financial interests.

6.1 Non-Public Information and Insider Trading

Insider trading means using information of Asiacell business, or its suppliers, vendors or business partners, that is not publicly available, but which employee has access to as a result of job role or business relationship, to deal (purchase or sell) in shares or securities of a company, including of Asiacell or its external stakeholders. You must adhere per applicable company policies, and government laws & regulations in this regard, and ensure that;

- Never use non-public information of Asiacell, or its vendors, suppliers or business partners, to deal in Asiacell or other companies' shares or securities.
- Never share non-public information of Asiacell or its vendors, suppliers, or business partners, with someone else to deal in Asiacell or other companies' shares or securities.
- If unsure what information is public and what is not public, ask for guidance from line manager, or HR.
- Employees of Asiacell must protect the company's non-public information (digital or physical) at all times, including on and off duty, and even after your employment ends with Asiacell.

6.2 Employment outside Asiacell

- Asiacell employees are not allowed, with or without compensation, work, consult or provide service including but not limited to give presentations, speeches,

lectures, classes and workshops on Asiacell or its business, any company or organization unless prior written authorization of CEO and Chairman is granted.

- Any outside employment must be declared to Asiacell, including family business, charity and voluntary work.

6.3 Political Interest

Asiacell encourages its employees to participate in the political process, per government laws & regulations. Employees will not face any disciplinary action for their political views and political party choice. However, employees must;

- Declare to Asiacell prior to running for any political position or government office.
- Avoid conflict of personal political interest with Asiacell business interest.
- Never engage in any political activities while on duty or during duty hours while on duty at Asiacell or use all or any kind Asiacell logo, name or assets for political activities.

6.4 Bribery and Improper Payment

Bribery and improper payments can come in many forms, including cash, items, entertainment or anything else of value. Employees must immediately notify Asiacell about any gift or payment that is offered, or requested from, that he/she believes is a bribe, solicitation of a bribe, or improper. Failure to notify Asiacell will result in disciplinary action. If employee is unsure what is regarded as bribe or improper payment, ask for guidance from line manager, or from HR.

The exchange of gifts should be done per HR- Asiacell gift policy. Regardless of value, employee must never accept or offer gifts (or any other business courtesy) to anyone if it is believed that it might compromise, or appear to compromise ability to make decisions in the best interest of Asiacell.

Any gift (in the form of cash or otherwise) that is offered to employees by vendors, suppliers, business partners or customers of Asiacell, must be declined (in a polite way that the giver would not be offended). If for any reason (e.g. culturally it is offensive) employee cannot decline, he/she must immediately inform Asiacell, including line manager, or HR.