

MANSOUR MANUFACTURING & DISTRIBUTION GROUP

MMD CODE OF CONDUCT

This handbook outlines our company's mission, values, policies, and procedures, ensuring a clear understanding expectations and responsibilities



CODE OF CONDUCT MMD **CODE OF CONDUCT** MMD



ETHICS DRIVE LASTING EXCELLENCE

cornerstone of our success. We believe that ethical conduct, respect,

accountability, ensuring that every team member, partner, and stakeholder feels valued and empowered to contribute. By upholding the highest standards, we aim to create a positive impact within our organization and in the communities we serve.



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INTRODUCTION



INTRODUCTION

At MMD, we are committed to the highest standards of ethical conduct and integrity across every facet of our operations. Our Code of conduct serves as a foundational framework, guiding our decisions and actions to uphold trust, respect, and accountability within our organization and beyond. Rooted in our core values of integrity, understanding, excellence, unity, and responsibility, this code of conduct reflects our steadfast dedication to ethical behavior and compliance. It outlines clear standards for employees and distributors, ensuring that we consistently embody the principles of honesty, fairness, and responsible corporate citizenship. This document is more than a set of rules; it is our ethical roadmap, reinforcing our mission to operate with transparency, integrity, and a commitment to legal and ethical standards.

MISSION STATEMENT

MMD Company for Financial Investments is dedicated to manufacturing, marketing, and distributing high-quality branded consumer products that meet the needs of a wide variety of consumers and complement their lifestyles.

We achieve this by ensuring our diverse and talented teams make decisions based on sound information and execute using updated and effective processes. We reward our people fairly for their achievements and will continue to play an active role in advancing the welfare of our community.

Our future is inspired by the legacy of our founder, his compassion for his employees, and his drive for excellence, achievement, and progress.



CORPORATE VALUES

CUSTOMER SATISFACTION

Our first and foremost responsibility is to satisfy our customers. We will focus our efforts on offering them high-quality brands and services, which provide good value for their money, and this will be the driving force influencing our decisions.

OUR PEOPLE

As a company, we recognize that our people are the building blocks of our success. We will work to develop a highly skilled and motivated diverse team through rigorous selection, continuous development, and by offering fair opportunities for advancement, improved quality of life, and the chance to seize opportunities leading to personal and organizational triumph.

INTEGRITY

We will maintain the highest standards of ethics and integrity in all our dealings. We will work hard to maintain honest and open relationships based on mutual trust. We will honor all commitments, internal and external, whether verbal or written.

QUALITY IN ACHIEVEMENT

We will focus not only on achievements but also on the process that leads to that achievement with the highest possible standard of quality. Through continuous improvement and collective effort, we will become first or second in every market in which we compete.

PROFITABILITY & EFFICIENCY

Our profitability will determine our ability to grow. In our efforts to excel, we will optimize the use of our resources and keep waste to a minimum.

INNOVATION AND CREATIVITY

We encourage initiatives based on creativity and the innovations that will make us better at what we do. We will be flexible in our approach to work and will allow for the brilliant exceptions that flourish in an environment of calculated risk.

MUTUAL BENEFIT

We will conduct business in a fashion that benefits our company and all its stakeholders. Where collective benefits exist, we will work to promote them in a way that ensures the benefits are maintained for the long term.

> WE WILL NOT SACRIFICE FUTURE GROWTH FOR IMMEDIATE GAINS.

PURPOSE & SCOPE

WHAT IS A CODE OF CONDUCT?

Our Code of Conduct outlines how MMD, its employees, and its service providers should engage with society. Everyone must act with fairness, honesty, and efficiency while upholding the company's values and adhering to its regulations, standards, and internal policies.

OBJECTIVE O1

ESTABLISH & PROMOTE ETHICAL CULTURE

Establish Ethical Standards & Promote Ethical Culture: Foster an organizational culture that values ethical conduct and adherence to legal requirements.

OBJECTIVE O2

PREVENT AND DETECT MISCONDUCT

Prevent and Detect Misconduct: Develop and implement a program to prevent and identify criminal behavior effectively.

OBJECTIVE OS

UPHOLD AND PROMOTE COMPANY VALUES

Uphold Company Values: Ensure all employees and service providers act with fairness, honesty, and efficiency, aligning with company values and internal policies.

CODE OF CONDUCT MMD

WHY HAVE A CODE OF CONDUCT?



ESTABLISHING EXPECTATIONS



PROMOTING ETHICAL BEHAVIOR



PROTECT & MAINTAIN THE ORGANIZATION'S REPUTATION



GUIDING DECISION MAKING



SUPPORTING THE DEVELOPMENT OF EMPLOYEES

APPLICABILITY

TO WHOM DOES THIS CODE APPLY?

The Code of Conduct applies to everyone involved with MMD, including directors, managers, shareholders, employees, service providers, subcontractors, third-party intermediaries, suppliers. It guides their actions to ensure they avoid inappropriate conduct, uphold our values, and comply with applicable laws.

APPLICABLE LAWS & REGULATIONS

Employees and service providers must adhere strictly to all applicable laws and regulations. Breaching these laws is unacceptable and will result in penalties and disciplinary actions, which may include warnings, suspension, or termination of contracts.

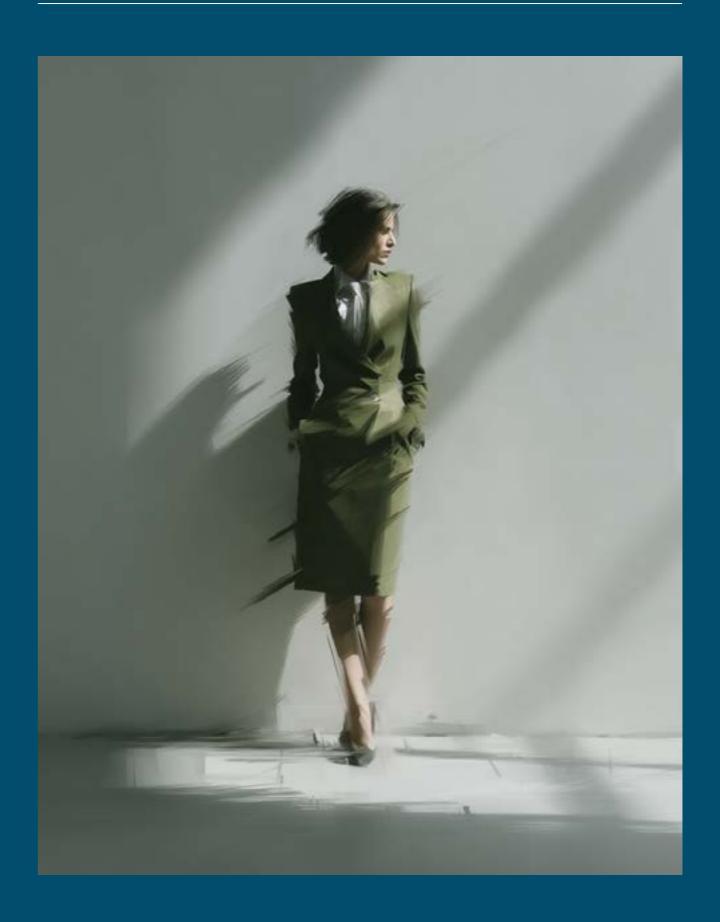
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CORE PRINCIPLES

WHAT DO WE STAND FOR?

Employees and service providers must adhere strictly to all applicable laws and regulations. Breaching these laws is unacceptable and will result in penalties and disciplinary actions, which may include warnings, suspension, or termination of contracts.

- Clarify MMD's corporate values for employees and service providers, ensuring they are understood, respected, and practiced.
- Serve as a model for individual and collective behavior.
- Promote consistent respect for these values across all locations, fostering correct, fair, and respectful interactions with stakeholders and the environment.
- Facilitate integrity, honesty, transparency, oversight, and control to prevent, identify, and address any irregularities or illegal activities that violate applicable regulations.



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EMPLOYEES

MMD CONDUCT TOWARDS ITS EMPLOYEES

DIVERSITY

MMD values diversity as essential to its success and growth. The company is committed to equal pay, recruiting and retaining talented diverse individuals and investing in their development.

NON-DISCRIMINATION

MMD provides equal job opportunities regardless of race, gender, beliefs, religion, or nationality. Career advancement is based solely on performance, talent, and alignment with MMD's values. Discrimination is not tolerated.

INADMISSIBLE PRACTICES

Intimidation, offense, or aggression by employees or service providers, whether directed at coworkers or stakeholders, will be addressed according to legal and company policies.

HARASSMENT

MMD does not tolerate any form of harassment, including moral or sexual harassment, and is committed to maintaining a respectful and dignified work environment. This includes verbal, visual, or physical conduct that creates a hostile work environment. Examples of harassment include sexual harassment, offensive language or jokes, inappropriate comments on race, ethnicity, gender, or religion, degrading comments, intimidation, or threats.

PROHIBITION OF DRUGS, WEAPONS, AND ALCOHOL

MMD strictly prohibits the consumption of drugs, carrying weapons, or working under the influence of alcohol. Violations of these rules are considered serious infractions and may lead to legal and disciplinary actions.

FUNDAMENTAL RIGHTS OF EMPLOYEES

RESPECT

MMD is committed to treating all employees with respect, regardless of their role, gender, position, or salary. The company provides conditions for personal and professional growth within the competitive context of their work unit.

APPRECIATION

MMD values human and professional development, recognizing and promoting diversified individuals based on merit, adherence to the Code of Conduct, and performance. The Human Resources policies foster collaboration, teamwork, responsible leadership, and initiatives that enhance quality of life and communication, contributing to a positive work environment.

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PERSONAL CONDUCT OF EMPLOYEES

INTEGRITY AND HONESTY

- · We conduct ourselves with honesty, integrity, and transparency in all our dealings.
- · We do not engage in any form of dishonesty, fraud, or deception.
- · We accurately and honestly represent information regarding our organization, products, and services.

RESPECT FOR OTHERS

- We treat everyone with dignity, respect, and fairness, regardless of differences.
- We foster an inclusive and supportive workplace where diversity is valued and celebrated.
- · We do not tolerate discrimination, harassment, or retaliation of any kind.

TRANSPARENCY

We commit to transparency by ensuring that our operations, decision-making processes, and communications are conducted in an open and honest manner. Ensure that information about MMD activities, achievements, policies, and performance is conveyed clearly, comprehensively, and systematically. All information should be easily accessible and presented in a manner that promotes clarity and understanding. We recognize that transparency builds trust, accountability, and integrity within the organization and with our external stakeholders.

MANAGING CONFLICT OF INTERESTS

We maintain a comprehensive Conflict of Interest Policy detailing all scenarios of potential conflicts. Full compliance with this policy is mandatory for all employees. These points provide a brief overview of the Conflict-of-Interest Policy. For comprehensive details, please refer to the full policy document.

Disclosure and Reporting:

Employees must disclose any potential conflicts and report them through approved channels.

Personal and Professional Boundaries:

Avoid any business activities that conflict with the company's interests.

External Roles:

Additional roles or functions must be approved by a superior or HR and should not affect job performance.

Supplier and Contractor Disclosure:

Suppliers and contractors must disclose any familial ties with employees and report conflicts to avoid penalties.

HIRING RELATIVES AND CLOSE INDIVIDUALS

Employees must inform their managers if they are considering hiring or engaging relatives or close associates for employment or services with MMD. Department Heads should report such instances to the Compliance Committee. Referrals of relatives and friends are allowed but must be communicated to the Human Resources department. Selection and hiring decisions remain with the responsible departments, and any pressure to influence such decisions is prohibited. Hiring relatives or partners is permitted, but they cannot hold subordinate positions within the same department.

EXTERNAL STAKEHOLDERS

CONDUCT WITH GOVERNMENTAL AUTHORITIES, PRIVATE SECTOR, AND THIRD PARTIES

COMBATING CORRUPTION

MMD strictly prohibits any form of corruption, including bribery and extortion, regardless of whether it involves public or private sector individuals. Corruption is defined as obtaining personal or commercial benefits through improper or illegal means.

RELATIONSHIP WITH GOVERNMENTAL AUTHORITIES AND THE PRIVATE SECTOR

MMD condemns corruption and adheres to all relevant anti-corruption laws and regulations. All interactions with public officials and private sector employees must be professional, legal, and ethical. Offering or accepting any form of benefit or favor is prohibited, as is hiring Politically Exposed Persons for improper advantages. Any inappropriate interaction or solicitation should be reported immediately to the Director and the Compliance Committee. MMD expects strict compliance with local laws from all employees.

RELATIONSHIP WITH THIRD PARTIES

Commercial dealings with third parties must be conducted fairly, based on legal standards, quality, cost-effectiveness, and technical competence. Any conflict of interest or suspicion regarding third parties must be reported to the Compliance Committee for review and resolution.



CONDUCT TOWARDS THE MARKET, CUSTOMERS, SUPPLIERS, BANKS, PARTNERS, AND COMPETITORS:

CUSTOMER SERVICE

MMD is dedicated to delivering high-quality products and services while maintaining efficiency, promptness, courtesy, and transparency in all customer interactions. If we are unable to fulfill a request or provide a service, we will clearly and respectfully communicate the reasons, ensuring that our customers and consumers are well-informed.

QUALITY AND COMPLIANCE

We are committed to offering only products and services that meet all relevant laws and industry standards. In the event of any non-compliance, we will implement appropriate corrective and compensatory measures to address and rectify the issue

FAIR COMPETITION AND CONSUMER RIGHTS

We recognize that fair competition and respect for consumer rights are essential for sustainable market development. No customer should be pressured into accepting conditions that violate these principles to purchase products or services from MMD business units.

FAIR COMPETITION AND RESPECT FOR COMPETITORS

MMD is committed to respecting its competitors and engaging in fair competition by providing products and solutions that offer a distinctive cost-benefit ratio to our customers. We do not tolerate any actions that may involve slander or defamation of competitors. We adhere to the principles of free competition and participate in industry associations solely to support the growth and advancement of the economic sectors in which we operate.

PURCHASE AND CONTRACTS:

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- Our relationships with suppliers and partners are founded on the pursuit of quality, favorable cost-benefit ratios, technical and financial reliability, and integrity in all negotiations concerning legislation, environmental considerations, and commercial, social, and contractual rights. To support our commitment to sustainable operations, MMD encourages its Procurement and Supply departments to continuously influence suppliers of products, services, and equipment to adopt responsible social and environmental practices and to foster more sustainable operational alliances.
- 2. When engaging in purchases and contracts with Governments, or with public agents, MMD ensures thorough assessment and compliance with all relevant laws and regulations to meet public authority requirements.

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CONDUCT TOWARDS THE MEDIA

MMD employees must maintain an ethical and independent relationship with the media. We respect the right of individuals to be informed about public issues, including those related to private companies, and acknowledge that it is the press's responsibility to obtain and disclose information. A free, independent, and unbiased press is essential for market improvement, democracy, and citizenship.

MMD rejects the use of economic influence to limit or manipulate press coverage. We recognize the importance of the press in shaping our public image and will provide information or respond to inquiries as appropriate, while reserving the right to withhold opinions on matters against our interests or maintain confidentiality on strategic issues.

Only designated spokespersons are authorized to communicate on behalf of MMD. If contacted by the media, employees must inform their supervisor or the Corporate Affairs department. Spokespersons and appointed individuals are responsible for media interactions, and no employee should contact the press on behalf of MMD without explicit authorization from the Corporate Affairs department.



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COMPANY & ASSETS

CONDUCT TOWARDS THE COMPANY AND ASSETS

USE AND SAFEGUARDING OF COMPANY ASSETS

Each employee is responsible for the proper use and protection of MMD's property and assets in their possession and must not use them for personal gain. This responsibility also extends to the assets of customers, suppliers, and partners utilized in the company's operations. These assets, including real estate, equipment, facilities, business plans, technical and market information, computer programs, and documents, should only be used for company purposes unless explicitly authorized otherwise.

Misappropriation or misuse of these assets, such as unauthorized copying, sale, or distribution, is a serious violation and may result in criminal and employment penalties.

PATENTS AND INVENTIONS

Innovations and patents developed through professional work at MMD must be kept confidential and remain the company's property, even after employment ends.

COMMUNICATION AND SOCIAL MEDIA USE

Use of MMD's communication tools (telephone, email, internet, social networks) for personal matters should be limited. According to internal regulations, these tools must not be used for sharing offensive, aggressive, or inappropriate content, or for discussing political, religious, or personal opinions that could harm MMD's reputation.

Disclosure of strategic information or making official statements on behalf of MMD through internet portals or social media is also prohibited.

INFORMATION TECHNOLOGY

Employees must adhere to information security protocols, safeguard their access passwords, and take care of the electronic devices provided by MMD.

ACCOUNTING AND RECORDS:

Accounting records must be accurate, clear, and comply with current legislation. They should not be used to conceal illegal activities. All accounting entries must be truthful and managed by responsible personnel in line with legal and internal regulations. These records are available for review by managers, the audit department, and legal authorities.

INSIDE INFORMATION:

Non-public information must be kept confidential, even after leaving MMD. Using inside information for personal gain or trading securities is illegal and may result in disciplinary and legal consequences.

COMPANY DOCUMENTS:

All working papers, reports, and documents are the property of MMD and must not be removed or copied upon termination of employment. These documents should be maintained according to information security standards.

PRIVACY LAWS:

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MMD collects, uses, and processes personal information solely for legitimate business purposes and as specified at the time of collection. We are committed to protecting this information from loss, misuse, or unauthorized disclosure.



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CORPORATE SOCIAL RESPONSIBILITY

COMMUNITY ENGAGEMENT

MMD strives to coexist harmoniously with the communities where its businesses operate, respecting local traditions, values, and the environment. We actively contribute to local development, quality of life improvements, and the reduction of social inequalities through direct actions and initiatives by MMD Corporate Affairs function.

CHILD LABOR

MMD prohibits the use of child labor and conditions in its operations and expects the same from its suppliers, customers, and partners. We support community development by providing internships, training, and educational programs for youth.

ENVIRONMENTAL RESPONSIBILITY

MMD is committed to complying with environmental laws and optimizing natural resource use. We encourage businesses to adopt integrated management systems with certifications in environmental quality and occupational health and safety. We also work with local communities to promote environmental awareness and conservation and seek to ensure that all stakeholders share these values.

CONDUCT TOWARDS, PROFESSIONAL & BUSINESS ASSOCIATIONS AND ENTITIES:

In our commitment to maintaining a high standard of professional integrity, all employees are expected to interact with professional and business associations, as well as external entities, with the utmost respect, fairness, and transparency. This includes fostering constructive relationships, adhering to ethical practices,

and avoiding any actions that could be perceived as conflicts of interest or impropriety. Employees should represent the company with professionalism, ensuring that all communications and dealings reflect the organization's values and commitment to ethical conduct. By upholding these standards, we contribute to a positive and trustworthy business environment that benefits all stakeholders involved.

MMD engages with sector-specific associations and entities to support sector development, provided that such participation adheres to competition laws and ethical standards. Each business unit should determine its involvement based on local association profiles.

Additionally, MMD values individual contributions by employees to recognized social, cultural, or charitable organizations, as long as these activities do not interfere with their work responsibilities at MMD.



COMPLIANCE & REPORTING

CONFIDENTIALITY AND PRIVACY

We respect the confidentiality of sensitive information entrusted to us by our organization, colleagues, customers, and partners.

We handle personal and organizational data responsibly and in accordance with applicable privacy laws and regulations.

COMPLIANCE WITH LAWS AND REGULATIONS

We comply with all applicable laws, regulations, and organizational policies.

We seek guidance when unsure about the legal or ethical implications of our actions.

PROFESSIONALISM AND RESPONSIBILITY

We strive for excellence and take pride in our work, delivering quality outcomes with diligence and professionalism.

We take responsibility for our actions and decisions, acknowledging both successes and failures.

We promote a safe and healthy work environment, prioritizing the well-being of our colleagues and community.

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WHISTLEBLOWING AND PROTECTION POLICY

We encourage open communication and reporting of any violations or concerns regarding ethical conduct.

We provide mechanisms for employees to report violations confidentially and without fear of retaliation.

We support and protect individuals who come forward in good faith with reports of unethical behavior.

Employees are encouraged to speak up and report concerns freely. Our organization is committed to protecting whistleblowers and ensuring their safety.

We have a detailed Grievance Policy outlining the whistleblowing process. Employees can report issues confidentially via email at grievance@mansourgroup.com.

ACCOUNTABILITY & ENFORCEMENT

Each MMD professional must ensure compliance with the Code of Conduct and inform their hierarchical superior, the Audit, or the Compliance Committee, of any violation of the Code of Conduct.

Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment.

We are all accountable for upholding these standards and promoting a culture of ethics and integrity within our organization.



