

CODE OF CONDUCT

Es'hailSat | Code of Conduct







H.E. Eng. Essa Bin Hilal Al Kuwari Chairman of the Board of Directors

Chairman's Message

The Code of Conduct translates our values into guiding principles of ethical practice. We are committed to establishing a culture of integrity, ethics and compliance in Es'hailSat in line with the highest standards and this code is a reflection of this commitment. From the very top of the company to the core of our operations, this Code serves to communicate a message that everything we do in connection with our work at Es'hailSat will be, and should be, measured against high standards of ethical business conduct in alignment with our vision and mission.

On behalf of the Board of Es'hailSat we commit to this Code of Es'hailSat, and we count on every employee and everyone we deal with to do the same.



Mr. Ali Ahmed Al-Kuwari President & CEO

President & CEO's Message

It is the vision of Es'hailSat to be a world class satellite operator that effectively contributes to the success of Qatar's National Vision 2030 by adding a new dimension to diversify the economy. We truly believe that this vision is dependent on having a strong ethical framework that demonstrates our commitment to doing business responsibly.

This code serves as a guide that will allow us to remain true to our commitments. Thus, non-compliance with this code is not an option. We expect compliance with this code not only from our management and employees but also from our stakeholders and everyone we do business with.

We encourage everyone to come forward, to speak out, ask questions, and voice concerns, when they witness a behavior that contradicts with the values and principles that we believe in. By complying with the Code of Conduct, we create a culture that is consistent with our goal, and that is achieving industry-leading standards in everything we do.



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Our Vision

Es'hailSat aims to be a world class satellite operator that effectively contributes to the success of Qatar's National Vision 2030 by adding a new dimension to the diversifying economy.



Our Mission

Es'hailSat will provide advanced satellite services to strategic stakeholders and commercial customers, who value broadcasting and communications independence, quality service and wide geographical coverage.

In order to achieve our mission, we are making these promises:



To commit to the future of our business, our industry, and our economy.



To constantly improve, seeking new service offerings and expansion opportunities.



To achieve industry-leading standards in everything we do, from capabilities to communications.







Our Core Values



Integrity

When we do business and when we deal with each other, we always have honesty and transparency on our mind. The value of integrity is core to achieving the success of Es'hailSat's vision and mission and we believe that if we work ethically, business will follow.



Reliability

We are dependable, we keep promises and honor our commitments. We accept the consequences for what we say and do and always strive to develop our potential.



One Team

We work together to achieve common goals, and we recognize the part played by each and every one while keeping a positive attitude. We value open communications and respect differences in points of view and strive to reach a common understanding.



Continuous Development

We are committed to the development of our business, our industry, and our economy and we aim to achieve industry-leading standards in everything we do. We learn from the past and are dedicated to improving our future, so we never settle for status quo and always search for new ways to improve.

Aim of the Code

The aim of the Code of Conduct is to uphold our values with guiding principles in relation to the best ethical practice. It is the foundation of our policies and procedures. It is built around the recognition that everything we do in connection with our work at Es'hailSat will be, and should be, measured against the highest possible standards of ethical business conduct. This Code sets our behavior and the standard of our conduct.

The Code describes commitment to doing business ethically and responsibly. Through this Code, we aim to:

- Outline ethical requirements for working at and with Es'hailSat.
- Provide guidance to and set the ethical standards for the whole Es'hailSat community including employees, Board Members, customers, suppliers and stakeholders while conducting business.

The Code as a Guideline

The Code sets the guidelines and minimum behavior expected at Es'hailSat and provides guidelines that will help us resolve everyday dilemmas. It guides us and helps us to:

- Conduct ourselves honestly and ethically.
- Uphold our values and protect our reputation and integrity.
- Understand what Es'hailSat expects from us.
- Do the right thing every day.
- Comply with the laws, regulations and standards that apply to our Company.
- Understand where to go for assistance or guidance if unclear about a situation.

Guidelines in this Code do not replace national legislation and regulatory conditions applicable in the State of Qatar or by applicable international regulations, nor do they serve as a substitute for a person's responsibility for exercising good judgement and common sense.

Speaking Up

It is important to note that this Code does not cover every situation. Thus, everyone is expected to apply good judgement and to speak up when there are questions or concerns. In the daily operations of Es'hailSat, cases may arise which are not covered by any of the clauses mentioned in this Code. Such matters shall be handled on a case-by-case basis, with a certain degree of flexibility without compromising ethical standards. In such cases, advice shall be sought from the HR, IA or the Legal Department.

In order to achieve our mission, we are making these promises:



Read, understand and familiarize themselves with all the elements of the Code.



Speak up if they witness a violation of the Code of Conduct or any applicable law or regulation.



Fully cooperate in invetigations as and when required.



Ensure that our business partners and everyone we work with are aware of the Code.

Applying and Following the Code

Everyone working for, with or on behalf of Es'hailSat, shall be committed to use good judgment and follow the Code. That includes every full-time or part-time employee and directors at every level of the Company, all the way up to the Board.

Anyone who works with or on the Company's behalf shall be expected to follow the Code to the most applicable extent possible including suppliers, consultants, contractors, vendors, business partners and others who may be temporarily assigned to perform work or services.

Everyone must share our commitment to integrity by following the principles of our Code when providing services to the Company or acting on our behalf. Everyone is expected to follow our Code of Conduct, in addition to other relevant Company policies. We are all responsible for upholding and maintaining of our standards.

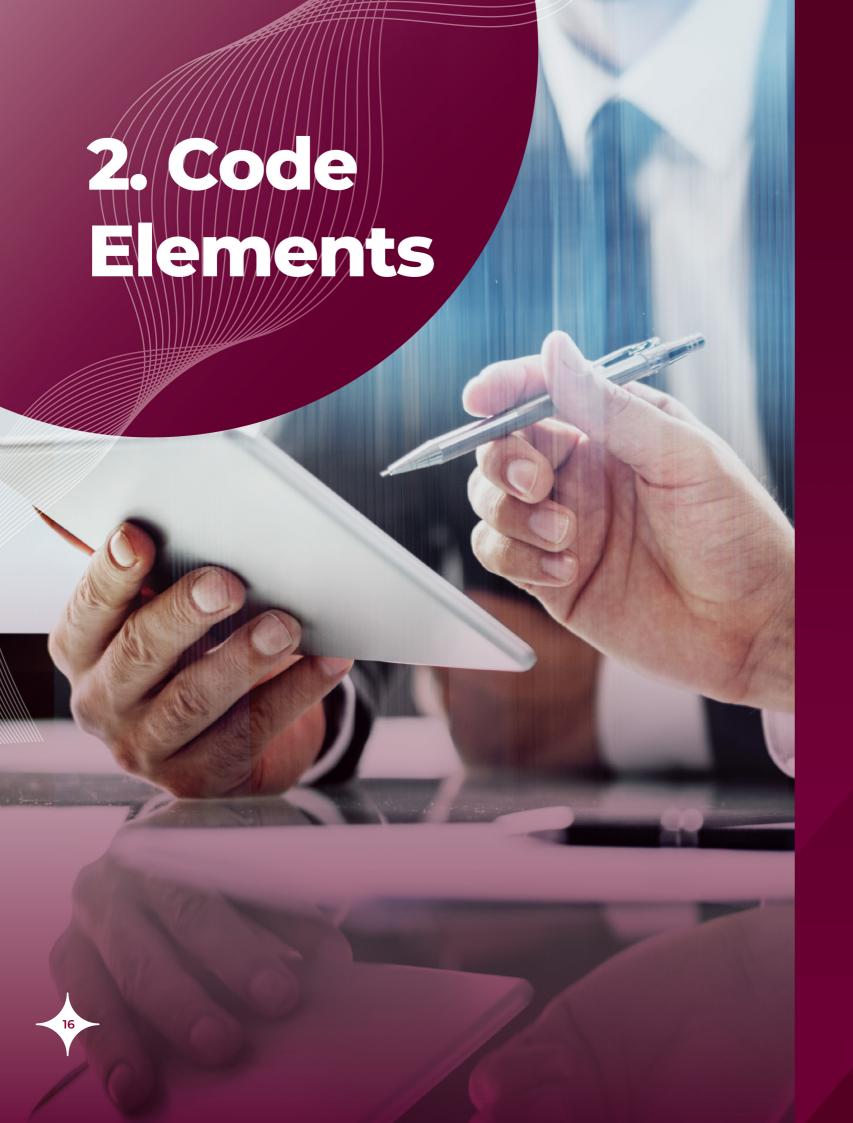
Compliance with the Code

Everyone working with us, for us and on our behalf will be provided open access to this document. Everyone shall be aware at all times of their legal and ethical responsibility towards Es'hailSat, at all times while conducting business for, with or through Es'hailSat.

Any breach of this Code by our employees may result in investigations which can lead to us taking disciplinary action based on the outcome of the investigation, which shall have consequences that can lead to termination of employment.

The same applies to everyone working with us who is subject to the code, including our third-party service providers or suppliers, and we will terminate any contractual relationship if investigations into unethical behavior or breaches of the Code are found valid.

Everyone is expected to ensure and secure compliance with this Code at all times. Failure of oversight or lack of good business judgement that leads to a breach of the code will not be tolerated and will result in an investigation.



Fair Competition

Fair competition is one of the fundamentals of the open-market economy. We are committed to the fair treatment of all of our current and potential partners and to creating a level playing field. This means that we treat everyone with respect and do not take unfair advantage.

We shall not violate the laws, rules and principles of fair competition and shall deal fairly with customers, suppliers, competitors, and colleagues. We shall not partake in discussions with competitors that may result in fixing or controlling prices, dividing or allocating markets, or boycotting suppliers or customers.

We are committed to the principles of free and fair competition in compliance with applicable competition and anti-trust laws domestically and globally.

Fairness in Supplier Selection

When selecting supplier, we are committed to the principles of value of money, transparency, ethical behavior, and professionalism.

We shall not provide any preferential treatment, disclose information, or provide other assistance to any third party in our dealings, leading to such party potentially obtaining improper benefit and undue advantage to the detriment of others. We are required to act impartially and adhere to Es'hailSat policies and procedures in dealing with suppliers and third parties.

In order to achieve our mission, we are making these promises:

- Achieving the best value for money
- Ensuring transparency (family-related or occupational interdependencies must be transparently communicated at an early stage)

- Treating suppliers fairly and equally without any bias
- Ensuring the application of a competitive and non-discriminatory process when dealing with suppliers
- Maintaining the confidentiality of the procurement process (only parties involved in the process shall have access to relevant information)
- Including a sustainable environmental criteria and CSR requirements in selection

Relationship with external stakeholders

We strive to develop and maintain strong and trusting relationships with our stakeholders. As part of our contractual obligations, we ensure that External Stakeholders and Business Partners are aware of our standards of business conduct and carry out appropriate due diligence prior to engaging with them. External Stakeholders and business partners' conduct that does not align with our standards and business ethics is taken seriously and may lead to the termination of contractual relationship.



Customer

We shall meet customer needs and shall deal with them in an honest, respectful and courteous manner. Moreover, employees shall provide high quality and reliable services. Business relationships are built on trust and transparency and we will not knowingly work with business partners who violate the laws, compete dishonestly, or use unfair business practices. We shall always be honest about the impact of our services and encourage open communication around goals and expectations. We shall always honor promises and commitments made to customers.



Community

We at Es'hailSat believe community development empowers community members and creates stronger and more connected communities.

We shall support the development initiatives of its local communities and encourage all employees to participate in such initiatives.



Suppliers

We shall base our procurement decisions on factors such as quality, price, performance, suitability, and reliability. While making such decisions, we shall be careful to avoid any conflict of interest or the appearance of any conflict of interest. We strive to choose vendors and suppliers objectively and strive for honesty in all business dealings with third party suppliers.



Company Records

As part of our commitment to integrity, honesty, ethics, and transparency, we ensure that our business and company records accurately and completely reflects our business transactions, including our assets acquisitions and dispositions.

In compliance with the record keeping provisions of the applicable anti-bribery and corruption laws, we require that accurate accounts and records must be maintained, including a system of effective internal controls. Our records must be accurate, complete and include sufficient details such that the purpose and amount of the transaction is clear. No false, misleading, or artificial entries must ever be made in our accounts and records for any reason. Likewise, we prohibit the use of off-the-books, secret accounts, overriding or circumvention of internal controls, or the issuance of any documents which do not properly and fairly record the transactions to which they relate.



We shall maintain accurate records in order to meet legal and regulatory obligations and to compete effectively. Employees shall:

- Use professional accounting and financial reporting standards when preparing financial or business records.
- Ensure that the record is accurate, complete, honest, objective and timely.
- Not knowingly make any false, misleading, incomplete, or unsupported entries in a record.
- Never utilize off-the-book or secret accounts.
- Only sign financial or other business records that are accurate and complete.
- Not knowingly suppress relevant information in a financial or other business record.
- Disclose financial and other business records.
- Follow all laws, external accounting requirements, an Es'hailSat's procedures for reporting, retaining, storing, and disposing of financial and other business records.

All Employees, Consultants and Agents must keep accurate and truthful business records that comply with legal, financial, and regulatory requirements as applicable.

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Conflict of Interest

Conflict of interest exists when a personal interest interferes in any way with the interests of Es'hailSat. Personal interest also includes those of close family members or enterprises in which we have personal and financial interest, whether directly or indirectly.

We are all expected to act in the best interest of Es'hailSat. This means we must never allow our personal interests to influence our actions on behalf of Es'hailSat or compromise it in any way. Every decision we make while working with or for Es'hailSat must be objective and with Es'hailSat's business interests in mind.

Everyone working for, with, or on behalf of Es'hailSat shall avoid activities influencing the objectivity of their business decisions. Business decisions must be based on the best interest of Es'hailSat and not for personal gain or benefit.

We are required to declare or report any situation that creates or might create a conflict of interest. We shall disclose any potential conflict of interest we may encounter in conducting our duties to Es'hailSat in line with the applicable policies and procedures. Conflicts of interest mainly revolve around, but are not limited to:



Practicing any business or trade that conflicts with one's own duties at work.



Using proprietary or confidential information for personal gain or to Es'hailSat's detriment.



Acquiring assets or property for the purpose of selling or leasing them to Es'hailSat.



Making direct or indirect private shareholding investments in suppliers or competitors.



Accepting gifts of any kind from customers, suppliers, or competitors in exchange of favorable treatment.



Offering gifts of any kind to customers, suppliers, or competitors in exchange of favorable treatment.



Unreasonable use of company assets for non-work-related purposes.



Personal relationships that interfere with the exercise of good judgement in decisions affecting Es'hailSat.

Everyone shall disclose any actual or potential conflict of interest that they know by signing the 'Conflict of Interest Declaration Form'. This form shall be governed and resolved in accordance with the applicable policy. Employees and Board Members shall be obligated to declare conflicts of interest and fill in the "Conflict of Interest Declaration Form" on annual basis and suppliers on an ad-hoc basis.

Confidentiality



Intellectual Property

Intellectual property (IP) refers to intangible legal rights that give the IP owner certain exclusive rights with respect to the IP. We shall protect the IP rights of Es'hailSat. Our intellectual and industrial property, which includes trade secrets, trademarks, patents and copyrighted materials, are a key information asset. We must always give proper attention to creating, protecting, and exploiting Es'hailSat intellectual property and to avoiding infringement of the intellectual property rights of others.

Any intellectual property that is created by an employee in the course of employment with Es'hailSat belongs to Es'hailSat, and the salary received during such employment shall be deemed to be a fair reimbursement for any such IP created.

Confidential Information

We shall maintain the confidentiality of the information entrusted to Es'hailSat at all times, except when disclosure is required by the law. Confidential information may include but is not limited to such items as prices of goods and services to different customers, procurement data, trade secrets, business plans, investment portfolios, payroll records, personnel files, unpublished financial data, and other non-public information.

It is the policy of Es'hailSat that everyone including Board Members, Employees, Consultants, Contractors and Agents must not disclose confidential information obtained in the course of their employment or engagement unless authorized to do so and to the extent strictly necessary to perform their duties.



We must be responsible while working with information technology, dealing through official e-mail and dealing with the media and social media, in their use, and only use them for the purposes and interests of work, while maintaining business secrets.

The obligation to preserve confidential information shall continue even after employment or engagement ends. All documents or other material containing any confidential information acquired, received, or made by employees or anyone during the course of the employment or engagement shall be surrendered by employees to Es'hailSat at the termination of employment or end of service. No one shall retain copies of such documents, neither shall they disclose what they have seen or heard to their colleagues or third parties. Information belonging to third parties but made available to Es'hailSat for legitimate business reasons, must also be protected and kept confidential.

Privacy

We are committed to protecting the rights of individuals whose personal data is collected and/or processed during the course of business in line with the applicable local and domestic regulations. This may include the data pertaining to Es'hailSat employees, candidates for recruitment, contractors, suppliers and customers. We shall protect the personal information to which we have access due to our role, duty or function.

We shall not disclose any information concerning Es'hailSat, its operations, its employees, its customers, or its business partners. We are fully responsible to maintain and safeguard documents, and information which are placed under our responsibility.

We may only process personal data for legitimate purposes and the data must be accurate and relevant for the purpose for which it was collected, as well as properly protected from inappropriate access or misuse. We strive to safeguard the security and confidentiality of personal information and will only share it with authorized individuals and with the knowledge and consent of the individual whose data is processed.

Gifts, Entertainment, and Bribes

We do not obtain a business advantage through bribery, corruption, undue influence, improper payments, preferential treatment, or any other illegal means. We have zero tolerance to any form of corruption, fraud or trading in influence.

We shall not, on behalf of Es'hailSat, give or receive anything of significant value to anyone with the purpose of influencing their decisions and actions. It is unacceptable to directly or indirectly offer, pay, solicit, or accept bribes or kickbacks in any form.

We shall not give or receive bribes to gain business or financial advantages. We shall reject illegal business practices such as corruption and white-collar crime and play a positive role in fighting them. We shall abide by Anti-corruption and Anti-Bribery laws and the relevant policies including Es'hailSat's Anti-corruption and Anti-Bribery policy. Partaking in bribery will result in serious consequences.

We may accept gifts, entertainment, business meals or favours if the value is below QAR 1,000 or rejection of the gift may result in embarrassment for the donor especially if the value of the gift is not significant such as flowers, chocolates, calendars or pen sets.

We may offer gifts of insignificant value and pay for business meals of reasonable cost to suppliers, customers and other related parties to build and advance relationships with the approval by their line managers and in line with the Company's Policy.

All gifts that are taken or given shall be reported as per the relevant guidelines and procedures. Failure to report offered or accepted gifts shall result in serious consequences.

If you require further information or have any questions about the appropriateness of offering or accepting a gift or invitation, you are required to discuss the matter with the Legal and Compliance Department prior to acceptance.



All are prohibited from offering, promising, giving, authorizing, paying, or soliciting, receiving and accepting any payment, commission, kickback, gift, promise, favor or anything of value, whether directly or indirectly through a third party, which is: (i) to or from any person or entity (whether a government official, a private business person, a commercial organization, or an associate of any of them); or (ii) for the purpose of improperly securing a private or business benefit or advantage, improperly influencing decisions and judgements, or for the improper performance of a function or activity.

Accordingly, we, shall refrain from, the proposal, providing or receiving of a kickback on any portion of a contract or unauthorized or secret rebates, discounts, commissions, or payments to, from, or for the benefit of, any person; for the purpose of this policy, a kickback refers to the payment or receipt of a portion of a contract, where the recipient is an individual who can influence the awarding of the contract.

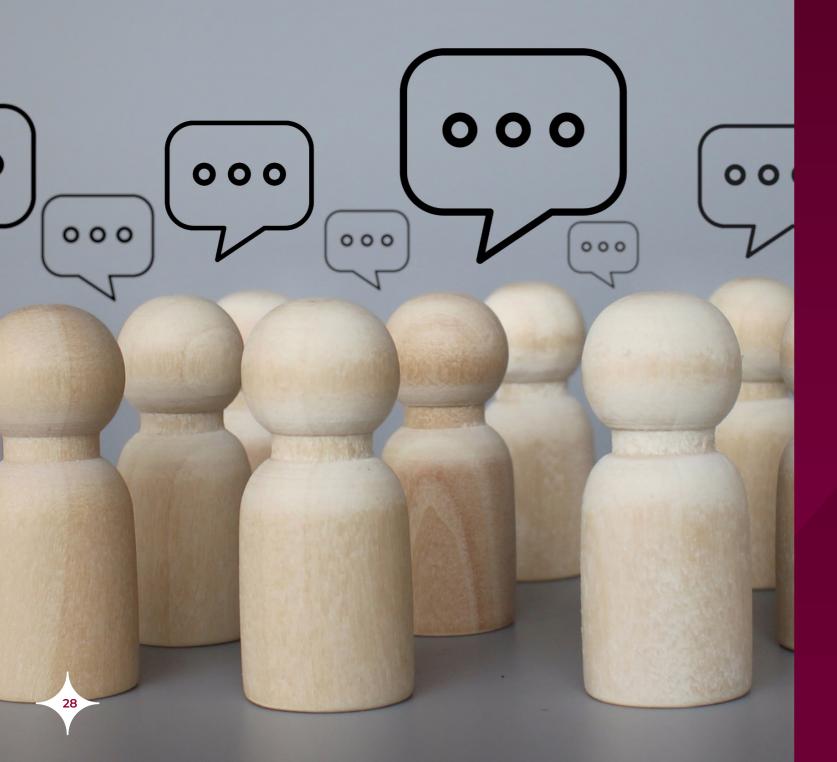
We shall never engage in any bribery or any form of corruption in both the public and private sectors. Neither shall we accept a bribe or any other gratuity that would tempt us to violate our duty of loyalty to Es'hailSat or our ability to serve Es'hailSat business interests.

Health and Safety

Health and safety are a priority to us. Accordingly, we are committed to the highest standards of safety to protect ourselves, our fellow colleagues and external parties who work at or visit our offices or worksites. We strive towards an incident free, secure, safe and healthy workplace and protection of the environment.

We are committed to running our business in an environmentally sound and sustainable manner and we expect everyone to take appropriate action and promptly report any hazardous situation.

We shall issue appropriate personal protective equipment and shall communicate safety work instructions for all hazardous activities. We are all expected to follow safe work practices (including regulatory and contract specific requirements) and hold high regard for the quality of the health, safety, security and environment in its conduct of all activities and exercise good judgment in work decisions.



We shall maintain a safe and healthy workplace for colleagues by adhering to health and safety policies and by reporting accidents and unsafe conditions. Some important health and safety tips for everyone:

- Knowing the way around the building, where the fire exit is, the location of fire hoses, the location of first aid kits, assembly points, etc.
- Reading and understanding the health and safety instructions.
- Not interfering with hazardous equipment or material that may be dangerous at the workplace.
- Following the instructions of Health and Safety representatives in cases of emergencies
- Comply with all applicable legislations, regulations, and relevant industry standards.

We are committed to providing a safe work environment. You must never engage in or tolerate any form of violence. "Violence" includes threats or acts of violence, intimidation of others or attempts to instill fear in others. No weapons are permitted on any our premises, consistent with applicable law.

Interpersonal Communication Ethics



Harassment

We strive to provide a safe and secure work environment for all employees. Any form of harassment or bullying by or toward employees, contractors, suppliers, customers, and communities is unacceptable. Harassment in any form is strictly prohibited in the work environment. Any intimidation, threats, or acts of violence, with or without weapons, verbal or physical, will not be tolerated. We have an unwavering commitment to prohibiting and effectively responding to harassment, discrimination, misconduct, abusive conduct, and retaliation. We set a tone at the top of commitment to a respectful, safe, and inclusive working environment for all employees and members of the extended workforce.

In order to achieve our mission, we are making these promises:

- Language of a suggestive or explicit and abusive nature.
- Unwanted propositions.
- Inappropriate questions or comments of a personal nature.
- Jokes of an explicit nature.
- Unwelcome verbal or physical advances and sexually, racially, or otherwise derogatory or discriminatory materials, statements or remarks.

Examples of nonverbal harassment include, but are not limited to:

- Staring/leering.
- Offensive publications.
- Offensive letters/memos.
- Offensive gestures and signs.
- Unsolicited and unwanted gifts.
- Creating an intimidating, hostile, or offensive work environment.
- Unreasonably interfering with an employee's work performance or affecting an employee's employment opportunity.

Anyone working for us, with us or on our behalf, found to engage in such behavior will be subject to serious consequences, as such behavior will not be tolerated under any circumstances.

If you are a victim of harassment, or reasonably believe that there may be recipients of harassment, or if you who have witnessed an incident of harassment against others, you are strongly encouraged to promptly notify the HR or Legal and Compliance Department.



Discrimination

Business decisions at Es'hailSat are made on a fair and equitable basis. Equal opportunities and equal treatment shall be given to everyone irrespective of their nationality, ethnic origins, skin color, gender, religion, physical condition, social background, or political outlook. Everyone shall maintain acceptable standards of personal behavior and shall ensure that others have the opportunity to work within, for or on behalf of Es'hailSat in a business-like atmosphere, free from discrimination.

Political Activities

No one at Es'hailSat shall be required to contribute to, support, or oppose any political group or candidate. Everyone has the right to voluntarily participate in the political process. If anyone chooses to participate in the political process, they do so as individuals, not as representatives of Es'hailSat.

No one shall work on political fundraising or other campaign activities while working at, with or on behalf of Es'hailSat or use company property for these activities. We shall refrain from engaging in any political activity within Es'hailSat or propagate any political thoughts within Es'hailSat at all times.

We shall not engage in any kind of political activities or be associated with any organization, body or group involved in a prohibited political, ideological or religious activity in the State of Qatar or practicing an activity against the State of Qatar.



Maintaining Professional Objectivity

We shall always work in the best interest of Es'hailSat. We shall always exercise due professional care while working at, with or on behalf of Es'hailSat. It is also our duty to ensure that the work on behalf of Es'hailSat is based on the highest possible standards both domestically and internationally.



Human Rights

Respect for human rights is a fundamental value. We respect and uphold international standards when it comes to human rights and do not engage in any conduct that hinders or interferes with it. We avoid infringing the human rights of others and refuse to be associated with acts of human rights violations.

We will not engage in and will not tolerate or work with third parties who:

- Employ children or minors.
- Engage in forced, bonded or compulsory labor.
- Take part in human trafficking.
- Whose employees are not duly paid or free to leave their employment after reasonable notice or are required to lodge deposits of money or identity papers with their employer.

Company Property

Es'hailSat's property and assets should strictly be used for legitimate business reasons. We shall protect and properly use Es'hailSat's assets, including, but not limited to company funds, information resources (software, data), hardware (computers, printers, etc.), financial and operation records, internet access, email, and telephone service.



Like all organizations, we depend on the use and exchange of information for our business decisions and day-to-day activities. We need to ensure we create, use responsibly and protect this information, especially when it comes to data such as personal details, commercially sensitive information and intellectual property – both our own and that of others. We need to take special care to protect confidential information when we are away from the company environment. We also have a duty to ensure we retain proper records of our business activities to preserve corporate memory and meet legal and regulatory requirements.

Any third-party software used must be properly licensed to Es'hailSat. Accordingly, no software may be installed, copied, shared, or distributed without prior written approval of the IT Department who have the ultimate responsibility for the type of software in question.

We shall protect and safeguard company assets, whether, material, electronic, financial, or intellectual, against damage, theft and unauthorized use, including our own authorized use or misuse.

Smoking, Alcohol, and Substance Use

Es'hailSat has a 'no smoking policy' inside its premises. Smoking is only allowed at designated areas, outside the buildings. Smoking in toilets or at stairwells is strictly prohibited as this poses a fire risk.

The possession, use, distribution or sale of any alcoholic beverage or prohibited substance on Es'hailSat property or whilst conducting Es'hailSat's business is strictly prohibited.

We conduct business in a safe manner, free from the influence of any substance that could impair our conduct. Our position on substance abuse is simple: It is incompatible with the health and safety of individuals, and we do not permit it. You must never use alcohol, illegal drugs, controlled substances or medication in a way that might harm your ability to conduct your work and business safely and successfully.

The use of illegal drugs and alcohol at work is inconsistent with the behavior expected from the anyone working with Es'hailSat and is against the Qatari Law. For the safety and wellbeing of our everyone, the use, abuse, possession, distribution, and/or sale of illicit drugs or alcohol during or outside business hours, on or off our premises, or in a way which violates Qatari law is not tolerated and shall result in disciplinary and legal action.

Being unfit for work because of the use of illicit drugs or alcohol is not tolerated. In case of a suspicion of violation, Es'hailSat has the right to demand an alcohol and/or drugs test as deemed necessary.

Dress Code

Personal appearance and attire must reflect a professional work environment and shall conform to the rules of decency in accordance with the local Qatari customs. A high standard of personal hygiene is expected at all the times. Employees must pay due respect to the culture and traditions of the State of Qatar, comply with rules and regulations issued by its authorities and observe general customs and traditions.

The dress codes for all should be in accordance with business ethics and taking into account the person's custom or religion. The dress code is intended to portray a professional image of Es'hailSat and anyone who works for it, with it or on its behalf. Employees may be required to wear uniforms where required as part of their roles.

We shall dress business smart casual or formal during execution of our duties on behalf of Es'hailSat, and during meetings.

External Communications and Social Media

All communications with the media or through any social media platform shall be carried out in a courteous and professional manner and in coordination with the Marketing Department. Only individuals appropriately authorized by Marketing Department shall speak on behalf of Es'hailSat. Inquiries from the media shall be immediately directed to the Marketing Department.

We must direct all media enquiries to the Marketing Department and shall not issue any communications to the media, such as press releases, information uploads to social media platforms, without first obtaining permission from the Marketing Department.

Unauthorized representation of Es'hailSat on social media, and release of Es'hailSat related information on public domains such as X, Facebook, LinkedIn, and other social media platforms is prohibited. We are expected to remain respectful when writing about Es'hailSat, competitors, and industry partners on social media. Anyone posting content on social media related to Es'hailSat understand that they do so in a personal capacity and are personally responsible for the content posted unless explicitly authorized to do so on behalf of the company by the Marketing Department.

Es'hailSat information assets are one of the Company's vital resources which require protection. These include both paper and electronic records and also the systems that store, process or transmit company information. We shall not participate in any social media, using pseudonyms, leaking any information, in a manner that offends the reputation of the job or the company or a person, or reveals its secrets.

Anyone who publishes content on social media related to Es'hailSat without the consent of the Marketing Department and causes reputational damage to Es'hailSat shall face serious action.



Diligence at Work

We shall perform our work or service to Es'hailSat with necessary diligence, accuracy, and honesty. We shall strive for excellence in achieving Es'hailSat's objectives in line with its vision and mission and shall maintain a high standard of ethical behavior and conduct ourselves in line with the Core Values.

Protecting the Company Interest

We shall protect the interests of Es'hailSat at all times and should not cause damage to the property or reputation of Es'hailSat.

We shall avoid any action that may be seen to be undesirable, or bring Es'hailSat, or its name, into disrepute.

Where damage is caused by carelessness, negligence, or malicious acts, we shall be held liable and will be asked to cover the cost of such damage.

Disclosure of Arrests, Convictions, or Court Judgements

We shall inform and declare to Es'hailSat if we are:

- Arrested and refused bail, or if we are convicted by a court of criminal offence (except a traffic offence with a non-official vehicle, for which the penalty does not include imprisonment or disqualification from driving).
- Subject to civil actions as a result of professional or business activities where a court has convicted us.
- Subject to a judgement by any court relating to debt, if we are declared bankrupt or served with a bankruptcy order or, if we enter into any compromise agreement with creditors.

3.Compliance and Reporting

Whistleblowing and Reporting

We have a "zero tolerance" policy for any conduct that violates the Code. We have a responsibility to report any witnessed or suspected incidents of misconduct, unethical or other behavior incompatible with the provisions and spirit of the Code of Conduct.

We shall maintain knowledge of all code elements and shall promptly report incidents that may be violations to the HR Department.

Es'hailSat is fully committed to safeguarding the process of speaking up and guarantees that no retaliation of any form will be taken towards those who raise concerns regarding irregularities and violations in good faith. Anyone who comes forward shall be treated professionally and objectively and shall not be subjected to any form of punishment or discipline.

All reports shall be dealt with confidentiality, and the identity of the person who reports incidents of code non-compliance shall not be revealed, taking into account Es'hailSat's obligations under the law.

However, in case it has been proved that you were a party in the activity, an appropriate action against you shall be made but your voluntarily reporting of the violation in question shall be taken into consideration.

Verification and Investigation

All reported incidents shall undergo a preliminary verification process to ascertain the validity of the report. We treat reported breaches with the utmost confidentiality and in a professional manner.

All cases shall undergo an investigation process led by an Investigation Committee. Where, following investigation, Es'hailSat is satisfied that a breach of the Code has occurred, action may be taken in accordance with the appropriate Policy.

The nature of any action will depend on the seriousness of the breach, and other relevant circumstances.

Anyone who reports false actions shall face serious consequences.

Violation of the Code by employees could result in disciplinary action, including termination of employment.





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