

Guide to the Code Of Ethics

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we are directed by our
MORAL COMPASS



A message from our CEO



As we embrace new challenges in a fast growing economy, the one thing that must never change is our commitment to the highest ethical standards. This Code is intended to be a central guide and reference for Group employees in support of day-to-day ethical decision making. It provides visible guidelines and serves as an important communication vehicle consistent with the culture and values of Webcor Group.

This Code is applicable to employees at all locations owned, leased, managed, or operated by the Group, including its subsidiaries and any Company ultimately owned by the same beneficiary owners, as well as all of the Group's corporate directors, officers, employees, agents and representatives.

Each employee has a direct responsibility to read, understand and comply with the Code. The employee is also responsible for following the business practices defined in this Code and for taking the initiative to seek help or clarification to avoid unethical or illegal business decisions. Managers are also responsible to discuss and clarify the ethical principles and business practices in this Code with all employees in their departments and for ensuring that its provisions are understood and complied with.

I look forward to your constant commitment to lead Webcor Group with the highest standards of ethical practices.

Wissam Nesr
CEO

Our moral COMPASS

Care for our colleagues and our business partners

Obey the law

Maintain high levels of safety, security, health and environmental standards

Preserve our assets and resources

Avoid conflict of interest

Strive for fairness and high ethical standard

Speak with honesty

■ Fundamental Principle

As a group of people working together, we believe in conducting our business in a socially responsible and ethical manner in accordance with the universal principles of human rights and justice.

■ Obeying Laws & Regulations

Webcor Group and its employees are expected to know and comply with applicable laws and regulations.

■ Harassment & Discrimination

Webcor Group is firmly committed to providing equal opportunity, fair treatment and a harassment free work environment to all employees, consultants, contractors, customers, and business associates.

We will recruit, employ and promote employees on the sole basis of the qualifications and abilities required for the work to be performed. We abstain from using child or forced labor.

■ Health & Safety

Webcor Group is committed to providing a safe and healthy workplace for all employees and shall continually strive to comply with all applicable laws relating to occupational health and safety.

■ Consumers & Customers

Webcor Group is committed to offering consumers, healthier and high-quality products.

■ Business Partners

Webcor Group is committed to building strong and profound relationships with our suppliers and our partners, founded on trust and mutual benefit. We favor business partners who share our values and our ethical practices.

■ Community Involvement

As responsible corporate citizen, Webcor Group works to create positive social and environmental footprints in the communities in which we operate. We are committed to help sustain our

communities by supporting the development of our local workforce and conducting targeted social initiatives.

■ The Environment

Webcor Group is committed to managing and minimizing our impact on the environment across all our operations. We believe that growing in sustainable manner will guarantee the livelihoods of the generations to come.

■ Innovation

Webcor Group is committed to meeting and exceeding the demands of our customers by providing innovative, flexible and cost-effective solutions.

■ Corruption & Bribery

No Webcor Group representative shall, with any intent (or in connection with any scheme) of corruption, bribery or kickbacks, contribute or offer to contribute, accept or solicit anything of value in connection with securing business, goods or services for the Group or on behalf of the Group.

■ Gift & Entertainment

Webcor Group representative is not to offer, solicit, or accept gifts, payments, fees, services, special valuable privileges, vacation trips, accommodations, or other special favors from any organization, person or group that does or is seeking to do business with the Group.

■ Money Laundering

Webcor Group and its employees will comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes.

■ Confidentiality

Webcor Group and its employees are bound not to reveal to third parties any information regarding the technical, industrial, financial and commercial know-how of the Group, nor any other information regarding the Group or any third parties with whom we have an obligation of confidentiality.

■ Accurate Business Records and Records Management

Webcor Group representative and entities shall maintain complete, nonmisleading, accurate, and reliable company records and accounts in all material respects.

Webcor Group's policy is to comply with all financial reporting and accounting regulations applicable to the Group.

■ Assets & Resources

Webcor Group and its employees are committed to complying with all procedures that protect the value of the Group's assets, including physical property such as equipment, computers, cars and intellectual property such as brands. Defalcation, embezzlement, fraud, theft or misappropriation of funds or property is strictly prohibited and will not be tolerated.

■ Conflicts of Interests

Webcor Group and its employees have a duty to act in the best interest of the Group at all times. This duty is breached when Group representatives engage in activities that cause a conflict of interest. A conflict of interest occurs when a representative's private interest, or the private interest of a family member of a representative, interferes or appears to interfere in any way with the interest of Webcor Group as a whole or any of its subsidiaries.

No Webcor Group representative shall take any action or enter into any contract, agreement or binding commitment for or on behalf of the Group unless such action has been duly approved and its entry authorized in accordance with the applicable policies and procedures of the Group.

■ Compliance - Monitoring - Reporting

Webcor Group's approach to the implementation of this Code is active and ethically sound. We will do our utmost to identify and resolve ethical, legal environmental, employment, and human right issues consistent with the present Code.

Webcor Group's Management strongly encourages personnel to raise possible ethical issues, violations of rules, regulations and institutional policies to their line managers, supervisors, the legal Department or other appropriate personnel and to use all means put at their disposal to report violations of all sorts.

Retaliation against Webcor Group employees that make good faith reports regarding potential violations of laws, regulations or policies is prohibited. Concerned parties are expected to fully cooperate in internal investigations of misconduct.

Any employee of Webcor Group that authorizes directs or in any way participates in any activity that is in violation of the Code of Ethics and Standard Practices shall be subject to appropriate disciplinary action.



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