



شركة الإنشاءات الإنمائية  
Construction Development Company LLC

Date: 10 October 2011

**CODE OF CONDUCT**

**INTRODUCTION:**

The rules and guidelines contained in the Code are the unyielding boundaries within which every CDC employee must apply in all business activities.

The Code sets high standards, rules and expected behavior in order to avoid situations that may result in damaging you or the Company. It does not exempt anyone and therefore, should be followed by every employee, irrespective of grade or title in CDC and Branches, all Partners and Joint Ventures. Contractors and Consultants working for us or on our behalf should be made aware of the Code as it applies to our staff in their dealing with them.

In your daily activities you may meet situations which compel you to seek advice or report them to the Company. In such cases you may contact:

- Your line manager or supervisor
- Other senior CDC Staff with whom you feel comfortable
- The Executive Directors Mr. Peter Sholy, Mr. Izeldin El-Saigh or Myself

There are specific areas in the Code where a breach is likely to carry severe consequences up to and including instant dismissal and in some cases fines and imprisonment.

I look forward to your full understanding and cooperation.

**Khalil Al-Sholy**  
**Managing Director**



## **Rules and Guidelines**

CDC strives to conduct its business in accordance with strict ethical and universal principles incorporating honesty, integrity, transparency and respect for people.

The following principles should be treated as an essential guide for your dealings:

### **1. Corruption:**

Never offer, pay, seek or accept payment or gift (directly or through a family member or friend) in return to influence a business decision. Ensure informing people you deal with to understand this principle and report to the Company if you suspect any corruption attempt by individuals or entities dealing with the Company.

### **2. Conflict of Interest (COI):**

Declare to your line manager or higher authority any matter that may be construed as a potential conflict of interest in your business decision by stating in writing all the relevant facts. Line Managers are expected to advise Executive Management accordingly.

Ensure that in all your dealings with contractors, suppliers, consultants, etc to be impartial, professional and competitive in order to safeguard the interest of the Company.

You must seek, with detailed justifications, prior written approval from the Company if you plan to use your knowledge, position or experience for external material gain.

### **3. Safeguarding the Interest of the Company:**

The assets of the Company are financial, physical or intangible and include buildings, offices, work in progress, equipment, funds, knowhow, data, intellectual property and records. The necessity to protect them is unquestionable and should be present in all dealings.

**4. Health, Safety, Security & the Environment (HSSE):**

The Company is committed to the goal of doing no harm to people and protecting the environment. Its crucial objective is to have an HSSE record that all employees can be proud of. The aim is to earn the confidence of our clients, shareholders, authorities, society and to positively contribute to sustainable development.

Therefore each department should regularly set targets for HSSE upgrade and improvement. Decisions on business activities should integrate economic, health, safety, security, environmental and social considerations. Employees at all levels are expected to always be conscientious and act as safety officers promptly reporting any hazards or unsafe practice in their day to day work.

**5. Equal Opportunity:**

Employment decisions on hiring, evaluation, promotion, training, development, compensation etc should be based on qualifications, merit, and performance and business decisions. There should be no discrimination according to race, colour, religion, age, gender, marital status, ethnic origin or nationality, always bearing in mind national legislations and cultural factors.

We should treat others with respect and avoid situation that may be seen as inappropriate. The company will not tolerate any action, conduct or behavior which is humiliating, intimidating or hostile. Some actions may be acceptable in one culture but not necessarily so in others.

**6. Compliance:**

In dealing with government departments & public authorities, it is imperative that the highest standard of respect, understanding and integrity are maintained throughout including full compliance with all Laws, Regulations, Guidelines and Directives. Breaches will result in severe disciplinary actions.

**7. Communications:**

Business communications should be handled with utmost care and diligence. It should not mislead, include speculative opinions, exaggerations, engagement in casual conversation on sensitive or confidential matters.

The above apply to all kind of correspondence including mail (hard and electronic), instant messages, websites, social media tools, faxes, voice and voice mail recordings.

**8. Public Disclosure:**

Disclosed information or press releases must be true, accurate, consistent and not misleading. Confidential information is protected and only disclosed by an authorized representative of the Company

**9. Economics & Commitments:**

It is extremely important that before any decision is taken on investment, purchases or other commitments such as disposal of surplus materials, consideration should be adequately given to the relevant economic, social and environmental criteria and cleared with the appropriate authority.

Finally, it is the duty of Department / Unit Managers continuously to assess the above principles and discharge their responsibilities accordingly. The code will be reviewed, upgraded and supplemented as necessary.

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