

Special Integrated Logistics Zone Code of Conduct

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1. Introduction:

The Special Integrated Logistics Zone is committed to respecting the high standard of labor, human rights, environmental, and ethical conduct, and all international treaties that Saudi Arabia is part of/ signed to.

Established Entities and Investors are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically and adhere to environmentally responsible practices.

The Governing Body of the Special Integrated Logistics Zone requires all Established Entities to operate in accordance with the principles and requirements, as applicable, in this Code of Conduct (“Code”), and in full compliance with all Applicable Laws and Regulations of the Special Integrated Logistics Zone and the Kingdom of Saudi Arabia.

This Code of Conduct is mandatory to all Established Entities within the Special Integrated Logistics Zone jurisdiction, this Code of Conduct is designed to be in compliance with the requirements set by the Kingdom of Saudi Arabia and the UNGP (United Nations Guiding Principles on Business and Human Rights) as well as international best practices.

2. Definitions:

2.1. Zone: The Special Integrated Logistics Zone

2.2. Governing Body: The General Authority of Civil Aviation

2.3. Applicable Laws and Regulations of the Special Integrated Logistics Zone: All published laws, regulations, and rules of the Special Integrated Logistics Zone

2.4. Established Entities: Companies established and licensed pursuant to Article 5 of the Implementing Regulations of the Special Integrated Logistics Zone

2.5. Ecosystem: All subcontractors, suppliers, or service providers of Established Entities

3. Labor and Human Rights

The Governing Body believes that all workers in the Special Integrated Logistics Zone and its ecosystem deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and Established Entities and their ecosystem shall uphold the highest standards of human rights.

Established Entities must adhere to the Human Rights law of the Kingdom of Saudi Arabia, the country in which they are operating in and all other applicable standards. The Special Integrated

Logistics Zone complies with all applicable laws regarding the treatment of all employees and workers whose work intersects with that of Established Entities and other Zone operations. The Governing Body insists that Established Entities must also uphold these principles and is committed to working with all Established Entities and their ecosystem as they undertake similar assessments of their own business and develop their own approach to respecting human rights.

3.1. Diversity and Inclusion:

The Governing Body believes in recognizing and valuing our differences to deliver superior results. Bringing together people of different races, gender, education, language, skill sets, and experience, enables ideas and innovation to flourish. The Governing Body expects Established Entities to be inclusive and to ensure that their employees and any employees within their ecosystem are always treated with dignity and respect. The Governing Body expects Established Entities and their ecosystem to implement a Zero Tolerance Policy towards discrimination or harassment against any individual based on their ethnic descent, national origin, race, color, gender, age, or disability. To best meet these expectations, Established Entities and their ecosystem should have formal policies that prohibit harassment and discrimination and should periodically review hiring and promotion practices to ensure fair treatment.

3.2. Anti-Discrimination:

Established Entities and their ecosystem shall not discriminate against any individual in hiring and other employment practices based on age, disability, ethnicity, gender, marital status, national origin, race, religion, or any other status protected by applicable national, local, or Zone laws and regulations. Established Entities and their ecosystem shall not require pregnancy or medical tests, either during the recruitment process or during employment except where required by applicable laws or regulations or when prudent for workplace safety and shall not improperly discriminate based on test results.

3.3. Anti-Harassment and Abuse:

Established Entities and their ecosystem shall commit to providing a workplace free of harassment and abuse. Established Entities and their ecosystem shall not threaten Workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and sexual harassment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

3.4. Wages, Benefits, and Hours:

Established Entities and their ecosystem must follow all applicable laws pertaining to working hours, wages and overtime pay. Workers must be paid at least the minimum legal wage or wages that meet local industry standards. Established Entities and their ecosystem should conduct

operations in compliance within the maximum working regular hours. Established Entities and their ecosystem must pay overtime and any incentive rates required to meet standards. Workers should receive necessary time off, paid annual leave and holidays, as required by the Laws & Regulations of the Special Integrated Logistics Zone

Established entities and their ecosystem shall meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, for each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the labor rules of the special integrated logistics zone and the Saudi law, and deductions from wages as a disciplinary measure shall not be permitted.

3.5.Prevention of Involuntary Labor:

Established Entities and their ecosystem shall ensure that all work is voluntary. Established Entities and their ecosystem shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. This includes the transport, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Established Entities and their ecosystem shall not withhold Workers' original government-issued identification and travel documents.

Established Entities and their ecosystem shall ensure that Workers' contracts clearly convey the conditions of employment in a language understood by the Workers. Established Entities and their ecosystem shall not impose unreasonable movement restrictions within the workplace or upon entering or exiting company-provided facilities. Workers shall not be required to pay employers' or their agents' fees for their recruitment and/or ongoing employment. This includes recruitment, application, recommendation, hiring, placement, processing, renewals, and/or recurring fees of any kind. If such fees are found to have been paid by Workers, such fees shall be repaid to the Worker.

Established Entities and their ecosystem shall ensure that the Third-Party Employment Agencies it uses are compliant with the provisions of this Code and the law.

3.6. Foreign Contract Worker Protections:

Established Entities and their ecosystem shall ensure that all work is voluntary. Established Entities and their ecosystem shall not traffic persons or use any form of slave, forced, bonded, indentured, or prison labor. Established Entities and their ecosystem shall ensure that Workers' contracts clearly convey the conditions of employment in a language understood by the Workers. Workers shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employment. If such fees are found to have been paid by Workers, such fees

shall be repaid to the Worker. Workers must be trained in their on their rights prior to leaving their country of origin.

3.7. Prevention of Underage Labor:

Established Entities and their ecosystem shall employ only Workers who are at least 15 years of age, or the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. Consistent with the Laws and Regulations Special Integrated Logistics Zone, Established Entities and their ecosystem may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

4. Environmental, Health, Safety and Security Practices

It is the responsibility of the Established Entities and their ecosystem to assure that their facilities are designed and safely operated in compliance with:

- (1) The established government and industry environment protection policies, as well as the Environmental Guidelines and Operating Manual of the Special Integrated Logistics Zone.
- (2) The Special Integrated Logistics Zone's high standards of environmental, health and safety practices to ensure that they do not present unnecessary risks to the environment or public.

The Governing Body is committed to a Zero Tolerance Policy towards any lasting environmental, or any health or safety related incidents. Established Entities and their ecosystem are expected to safeguard and comply with the relevant security controls. The Governing Body is committed to a Zero Tolerance Policy towards any event that may present a risk to its physical, cyber or information security.

Established Entities and their ecosystem must manage compliance, minimize environmental impact, and drive continual improvement of environmental compliance. Established Entities and their ecosystem must maintain documentation to be able to respond to requests for information including but not limited to resource consumption, emissions, compliance, environmental risks and liabilities and any other environmental sustainability matrices. Such compliance shall include, amongst other things:

- Obtaining and maintaining any necessary environmental permits in accordance with the Zone Guidelines.

- Proper handling and disposition of hazardous materials & refuse in accordance with the Zone Guidelines.
- Monitoring, controlling, and responsibly treating discharges generated from operations.
- Conducting appropriate employee safety training and providing adequate safety equipment
- Maintaining records of safety training and monitoring safety performance.
- Taking all reasonable steps to make sure that all employees comply with applicable health and safety rules and regulations and perform their duties and work in a manner which will not endanger themselves or others.
- Providing training required to promote sound public health and hygiene practices.
- Working to set Key Performance Indicators to monitor compliance of environmental, health and safety practices.

5. Ethical Business Practices

5.1. Business Integrity:

The Governing Body prohibits all bribery and corrupt payments, and all Established Entities and their ecosystem must comply with the applicable laws and policies that prohibit giving anything of value to any person or entity where the purpose is to obtain an improper business advantage. This prohibition is applicable to first degree relatives (i.e. father, mother, spouse, and children) of employees within Established Entities and their ecosystem. Bribery can include not just the payment of money, but the transfer of anything of value including entertainment or travel expenses, political or charitable donations. The Governing Body is committed to a Zero Tolerance Policy towards bribery in any form and is committed to conducting its business with integrity. The Governing Body also reserves the right to refer such matters to public authorities for possible criminal prosecution.

5.2. Fraud:

The Governing Body is committed to promoting honesty and integrity and is committed to a Zero Tolerance Policy towards fraud. This includes keeping accurate records and documentation. Established Entities and their ecosystem are expected to share this commitment and lead by example in ensuring adherence to appropriate regulations, procedures, practices, and the Code.

5.3. Fair Competition Laws

Established Entities and their ecosystem will conduct their business in line with fair competition and in accordance with all applicable competition laws. Established Entities and their ecosystem shall not engage in price-fixing, collusive bidding, price discrimination, anti-competitive, antitrust, or other unfair trade practices.

5.4. Ethical and Anticounterfeit Sourcing

Established Entities and their ecosystem shall source goods or services from third parties that meet, as a minimum, country of origin standards for health and safety, working hours, pay , employment conditions and environment protection.

Established Entities and their ecosystem have a responsibility to know the origins of all parts and materials and to ensure authenticity. Established Entities and their ecosystem must respond to requests for information, regarding the source of any parts or materials.

5.5. Information Security

Established Entities and their ecosystem shall maintain a data security program in accordance with the Information Security and Data Privacy requirements of the Special Integrated Logistics Zone, which is inclusive of technical and organizational measures to prevent misuse, compromise, loss, alteration or unauthorized disclosure, acquisition of, or access to, confidential proprietary or protected information.

6. Monitoring and Compliance

Established Entities and their ecosystem shall be responsible for complying with the requirements set forth in this Code of Conduct and shall conduct periodic internal reviews, inspections, and audits to ensure their compliance with the Code. Established Entities and their ecosystems may be subject to external audits to ensure compliance with the Code and other applicable regulations.

Established Entities and their ecosystem shall raise awareness among their employees to ensure adherence to this Code. No code or policy can anticipate every situation that may arise. However, the Governing Body expects Established Entities and their ecosystem to exercise independent professional judgment and to deter wrongdoing in the conduct of all duties and responsibilities on behalf of the Governing Body.

Established Entities and their ecosystem have a responsibility to understand and follow this Code. In addition, all Established Entities and their ecosystem are expected to perform their work with honesty and integrity in any areas not specifically addressed by the Code. Established Entities and their ecosystem are required to immediately notify and promptly disclose to the Governing Body as soon as they become aware of any actual or potential violation of the Code through the official channels.

The Governing Body is committed to a Zero Tolerance Policy towards retaliation against any person who files a complaint of violation of this code or participates in any related proceeding.

Established Entities and their ecosystem shall maintain appropriate records to substantiate compliance with the requirements of the Code and provide such proof to the Governing Body upon request; and shall support the Governing Body in any inquiries or investigations pertaining to violations or apparent violations of this Code. Furthermore, Established Entities and their ecosystem are expected to take the necessary corrective actions to promptly remedy any identified noncompliance.

7. General Clauses

7.1 This Code of Conduct will come into force with effect on the date of publishing.

7.2 This Code of Conduct is subject to review and amendment on a periodic basis.