



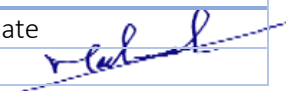
Code Of Conduct Policy

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Contents

1. Introduction	4
2. Purpose	4
3. Scope.....	4
4. Compliance	4
5. Responsibilities to report.....	4
6. Our Business Conduct	4
7. Use of Corporate Information and Property.....	5
8. Our Work Environment.....	7
9. Employee Commitment	8

1. Introduction

Ethical behavior is essential to your position with SNLC and is a personal responsibility that should be taken very seriously. We need and expect each Employee to be accountable for their work and behavior and to support the values, principles, and standards upon which SNLC's business reputation rests. This Code of Conduct (the "Code") is a guide to help you live up to SNLC's values, abide by SNLC's policies and respect the best interests of our customers and shareholders.

2. Purpose

The purpose of the Code is to describe principles of business conduct and to provide guidance in ethical decision-making. Many sections of the Code reference matters for which specific policies exist; this is because the Code encompasses standards of behavior set forth in other SNLC policies. You are expected to become familiar with SNLC policies that directly impact on your daily work.

3. Scope

The Code applies to all employees, contractors, and members of the Board of Directors.

4. Compliance

Compliance with the Code is mandatory. You are expected to be familiar with and comply with the Code in the performance of your duties. Also, you are expected to understand your obligations under SNLC policies. On an annual basis, all employees and members of the Board are required to sign an Annual Acknowledgement of Corporate Policies form. Those of us who fail to abide by the Code and SNLC's policies will be subject to disciplinary action, up to and including dismissal or prosecution.

5. Responsibilities to report

It is the responsibility of everybody at SNLC to report any known or suspected unethical conduct, which includes any violation of the Code, by other Employees or anyone in any way associated with the corporation. SNLC is committed to protecting all Employees who report unethical conduct from reprisal as well as offering any necessary support to individuals who make reports. When an Employee makes a report of unethical conduct they should do so in good faith. Detailed in the Whistleblower section of the Code are the reporting procedures for Employees who suspect or become aware of any unethical conduct.

6. Our Business Conduct

a. Public Disclosure

The objective of SNLC's Disclosure Policy is to ensure communications with the investing public in SNLC are:

- timely, factual, accurate, balanced; and
- broadly disseminated in accordance with all applicable legal and regulatory requirements.

The Disclosure Policy confirms in writing the Disclosure Policies and practices that SNLC follows. The Disclosure Policy extends to all Employees of SNLC, its board of directors, those authorized to speak on its behalf, and other people with access to undisclosed material information. It covers:

- disclosure and documents filed with securities regulators.
- financial and non-financial disclosure, including Management's Discussion and Analysis.

- written statements made in SNLC's annual and quarterly reports, news releases, letters to shareholders, and presentations by senior management and other Employees.
 - electronic communications through e-mail, social networking sites, and SNLC's website, including audio and video content; and
 - oral statements made in meetings and telephone conversations with analysts and investors, interviews with media, as well as speeches, press conferences, and conference calls.
- b. Insider trading and tipping
- SNLC's Securities Trading and Insider Reporting Policy apply to all Employees. Applicable securities laws prohibit all Employees with access to or knowledge of material non-public information from or about SNLC from buying, selling, or otherwise trading in SNLC securities or from informing or tipping others about material non-public information.
- c. Disclosure to the media
- If you are delegated to speak on behalf of the company, you will be briefed prior to being interviewed to review what is, and what is not public information.
- d. Conduct when representing SNLC
- Conduct yourself professionally and with personal integrity, both in and out of the workplace, reflective of SNLC values. Communicate and negotiate with honesty with all Employees, customers, partners, stakeholders, suppliers, associates, and other members of the public. Our obligation to act with integrity and within the spirit of this Code continues while traveling, whether domestically or abroad.
- e. Legal and social responsibility
- Ensure that your actions comply with and are within the meaning and intent of all applicable laws and regulations. Ensure that your actions are free from suspicion and criticism and have no unfavorable effects on society.
- f. Conduct with customers
- Serving customers is the focal point of our business. Our customers deserve the highest quality service and standards in all transactions.
- Provide our customers with value and deal with them fairly. Act with integrity and do everything possible to provide great service to our customers, either directly or by supporting the work of other individuals or business units.
- Do not make promises that you or SNLC cannot keep.

7. Use of Corporate Information and Property

Do not disclose information about SNLC activities or our customers' activities to non-authorized Employees within the workplace or anyone outside the workplace unless in accordance with SNLC's Disclosure Policy.

All information held by SNLC is confidential and the property of SNLC. This includes information relating to SNLC business, property, Employees, customers, partners, consultants, or others that are not generally available to the public.

In our business, we become aware of confidential information about our customers' business and personal ventures. We have a responsibility to uphold the trust of our customers. Do not discuss or disclose confidential customer information outside the workplace and ensure that uses of

confidential customer information within SNLC are consistent with the purposes for which it was collected.

Our obligation to keep corporate information confidential continues post-employment.

a. Use of Registry Information

Ensure that information contained in the public registries administrated by SNLC is used according to the appropriate policies and laws. Do not use registry information for purposes other than conducting SNLC business.

b. Use of computer systems and software

Our computer systems and software form the backbone of our services and our operations infrastructure. Every effort should be made to protect SNLC's computer systems and associated software from various threats to their security such as accidental or deliberate destruction of data or equipment, interruption of service, disclosure of confidential information, and theft or corruption of data. Any security concerns with respect to our systems or software, or any viruses or data network attacks, weaknesses, or unexplained system changes should immediately be reported to the IS Manager

c. Use of corporate property

Protect SNLC's physical property and revenues. The corporate property includes, but is not limited to premises, equipment, supplies, furnishings, funds, reports, records, vehicles, trade secrets, computer software, hardware and networks, internet accounts, and intangible items such as the details of business application systems.

Employees are responsible for ensuring that:

- SNLC's assets are protected and not used for personal use unless otherwise authorized.
- SNLC's intellectual property is subject to copyright and is not reproduced, distributed, or altered without authorization.
- as far as practicable, contracts are put in writing; and
- unless otherwise authorized SNLC's name or purchasing power is not used to obtain personal benefits, discounts, or rebates.

d. Proper Reporting of Financial Transactions

You are accountable for any corporate funds over which you have control. Follow the set procedures for handling, recording, and protecting funds. When spending SNLC funds, ensure that SNLC receives good value for the expenditure. Do not use SNLC funds for personal benefit.

Compliance with the International Financial Reporting Standards and internal controls is always expected and SNLC's books of account, reports, records, and other documents must accurately account for and report all assets, liabilities, and transactions affecting SNLC. We must:

- Maintain accurate and reliable records relating to business, customers, and employees to meet our legal and financial obligations and in accordance with our accounting and business practices.
- Not intentionally cause SNLC's books or records to be incorrect or misleading in any way and relevant information should never be omitted, deleted, or concealed.
- Not create or participate in the creation of any record intended to conceal anything that is improper.

- Properly and promptly record all disbursements of funds.
- Cooperate and ensure full disclosure in communications with both internal and external auditors and with the Chief Financial Officer and his group.
- Promptly disclose knowledge of any untruthful or inaccurate statements or records whether intentionally or unintentionally made.
- Promptly bring to the attention of your manager any transactions that did not seem to have a legitimate commercial purpose; and
- The information must only be destroyed in accordance with approved retention schedules and procedures.

8. Our Work Environment

a. Employee Professionalism

We are all committed to supporting a safe, healthy, and positive workplace for all Employees. We will not tolerate behavior that interferes with an employee's ability to perform his or her duties.

The use or effects of alcohol or illegal drugs are not acceptable in our work environment.

b. Equity

Respect the rights, culture, and dignity of all individuals and adhere to the principles of equity and nondiscrimination when dealing with Employees, customers, suppliers, and others.

We will not tolerate any form of discrimination or harassment, in accordance with applicable human rights legislation.

c. Employee privacy

We are all committed to protecting the privacy of Employees' personal information. Employee personal information will not be collected, used, or disclosed other than as authorized or as required for business reasons.

d. Conflict of Interest

We must refrain from engaging in any actions that might result in, or be seen to result in, a conflict of interest. As SNLC's employees, managers, executives, and board members, it is our duty to put the company's interests—including those of its clients and shareholders—before our own. Your personal pursuits, interests, or dealings become a "conflict of interest" when they may, might, or might be thought to:

- impair your ability to perform your duties as an SNLC Employee.
- have a negative impact on SNLC's reputation; or
- result in a personal gain or advantage due to your position in SNLC

We must not use our position to influence or bypass SNLC procedures for personal gain nor for the personal gain of a family member, friend, colleague, or anyone else.

Conflicts of interest negatively impact both you and SNLC.

e. Involvement in political activity

f. Gift acceptance

Gifts or benefits of any kind must not be given or received by an Employee or their immediate family when it might be perceived that an obligation is created, or favor is expected. The giving and receiving of gifts and promotional items of modest value are acceptable as is reasonable entertainment, if within the limits of responsible and generally accepted business practices.

Never solicit or accept a personal benefit as a condition of performing your duties.

- g. Payments to Agents, Consultants, Government Officials and Others
- Payments of any nature, which would be in violation of any law, are prohibited.
 - All payments of commissions and fees shall be in accordance with sound business practices.
 - Payments, gifts, or favors must not be made to any person with the intent to induce them to violate their duties or to obtain favorable treatment for the employee.

h. Violation Reporting

SNLC acknowledges and understands that violation is an activity that is stressful and which, without appropriate protections, can be a risky undertaking for an Employee. The intent of this section is to:

- Provide a mechanism for reporting actual or potential unethical conduct to a designated authority for investigation and appropriate action.
- Protect those Employees who report unethical conduct in accordance with this section from undue negative repercussions; and
- Protect those who may be wrongly or falsely accused through effective investigation procedures.

violation is the reporting by Employees, contractors, or Board Members of incidents of unethical conduct that is under the control of their employer, to persons or organizations that may be able to take action to address the unethical conduct. At SNLC, violation includes any incident of unethical conduct or violation of the Code.

Unethical Conduct includes any serious act or omission intentional or not which is contrary to SNLC's policies, operating procedures, or the Code, that is illegal, unethical, immoral with serious or negative implications for the public interest and the integrity of the company.

Good faith is when the Employee has a reasonable and genuine belief that unethical conduct has occurred or is occurring and is not making the disclosure for personal gain or with an improper motive.

9. Employee Commitment

By signing my name below:

- I acknowledge that I have reviewed the above-listed policies and guidelines of SNLC and understand my responsibilities under these corporate policies.
- I agree to report any actual or potential situation or incident that may be contrary to the above policies as soon as I become aware of it.
- I agree to abide by the above policies, and I understand that my failure to follow the policies may result in disciplinary action, up to and including dismissal.

Employee Signature _____ Date _____

Employee Name (please print first & last) _____