



Excellence in Engineering.

CODE OF ETHICS

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Mercury MENA believes in the highest ethical standards of work performance and the following Code of Ethics is considered general instructions guideline that will assist employees in performing their tasks and achieving the highest level of required personal honesty and professionalism.

I. Purpose of Code of Ethics:

Mercury MENA requires maintaining the highest ethical standards of the work performed. Therefore, this code of ethics is considered as an essential element of performance at Mercury MENA. Compliance with the requirements of this code is deemed an employment precondition, as the company expects its employees to take their responsibilities to the highest ethical and professional levels.

The importance of announcing the Code of Professional Ethics is to provide a general instructions guideline that assists employees in performing their tasks and achieving the highest level of required personal honesty and professionalism. The Code of Ethics is central to the way we protect and develop our reputation.

Code of Ethics is considered the essential element of employee's guidance policy, and it also facilitates adaptation with the main honesty principles. In addition, it defines Mercury MENA's commitment to impartiality and achieving tasks professionally. The Code goes beyond compliance with the laws and regulations wherever we run our business. It demonstrates our commitment to acting ethically and with integrity in every situation while respecting people's rights as individuals. We expect this of every Mercury MENA's employee, in every location, every day. We also expect this of our business partners. High standards in our relationships are the foundation for lasting success.

I. Applicability:

Code of Professional Ethics is applicable to all employees in local and external departments, including management level, administration officials, technicians and employees.

Any employee shall not accept or contribute in any work that violates or contradicts with the policies stated in the Code of Ethics. Accordingly, any violation to or contradiction with the policies of this Code shall be reported to the Human Resources department, and necessary disciplinary actions shall be taken, which may consequently lead to employment termination.

II. Violations:

Any employee, who violates any professional ethic, will be subjected to disciplinary actions that may escalate to employment termination. Examples of behaviours that may result in further disciplinary actions are:

- Inciting others to violate the Code of Ethics.
- Negligence to submit complaints regarding confirmed or potential violation to the Code of Ethics (cheating or stealing).
- Refusal to show up to investigations regarding breaches to the Code of Ethics.
- To misbehave with an employee when he submits a complaint regarding a breach to the Code of Ethics.

1. Values and Ethics:

An employee has to act with honesty, integrity and fair dealing with others and shall not make any inaccurate or misleading claims about any matters related to the activities of Mercury MENA, which may lead to conflict of interests.

The employee is required to characterise with values of forgiveness and humbleness. Mercury MENA expects its employees to maintain honesty, integrity and good conduct along with complying with applied rules, regulations and policies, in a manner that does not affect the position and reputation of the Company or reflects negatively upon employees' performance.

An employee of Mercury MENA shall persistently provide the highest level quality of services to customers, make sure that they are satisfied with the provided services and show the positive image of the Company.

2. Principle of Equal Employment Opportunities:

Equal Employment Opportunity policy of Mercury MENA affirms the right of every employee to participate in all aspects of employment regardless of race, colour, nationality, sex, age, marital status, national origin or disability (provided it is not affecting performance). The company depends upon qualifications (experience, education, abilities and skills) and all other standards that are adopted as a base for selecting and evaluating employees and applicants.

This principle shall be applied to several employment fields, such as: attraction, recruitment & selection, promotion, demotion or salary decrease, transfers, training and employment termination in addition to payroll system.

3. Management Responsibilities:

A. To ensure a work environment that ensures complying with the Code of Professional Ethics, as follow:

- To directly supervise implementation of policies by holding periodical meetings, studying submitted reports and continuous monitoring of all programs and commitment-related issues.
- Leadership shall be an example for employees through ethics and behaviours.
- Employees shall realise that obtaining results is not more important than complying with the Code of Professional Ethics.
- Encourage employees to ask any questions related to honesty or to raise a complaint, in situations where staying quiet may lead to harming the Company.

B. To prevent problems of breaching the Code of Professional Ethics:

- Ensure identification of problems of breaching the Code of Professional Ethics that may affect performance.
- It is essential to ensure communicating policies and procedures related to solving problems of breaching the Code of Professional Ethics.
- To disclose problems of breaching the Code of Professional Ethics through:
- Providing an efficient system that encourages employees to raise complaints without fear from any reaction.
- To respond to problems of breaching the Code of Professional Ethics as follows:
- Instant remedial response to solve problems breaching the Code of Professional Ethics.
- Taking necessary disciplinary actions.

4. Responsibilities of Employees:

4.1. Complying with systems & regulations:

Employees shall comply with systems and regulations applied at Mercury MENA, including those related to discipline, security, protection and policies and procedures of human resources applied in the group.

Employees are expected to fully perform their work, tasks and responsibilities in a manner that does not contradict with the interests of Mercury MENA.

4.2. Complying with the Code of Professional Ethics:

Upon joining the Groups team, employees shall comply with the following:

- Read the Code of Professional Ethics and make sure that they fully comprehend all points.
- Make sure that the Code of Professional Ethics is applied to all subordinates.
- Comply with all policies related to the Code of Professional Ethics.
- Not to hide any information related to breaching Code of Professional Ethics by other employees.
- Sign the message of adhering to the Code of Professional Ethics by the employee and maintain the signed message at the human resources Department.

4.3. Professionalism:

Every employee shall perform his duties and tasks to the highest level of quality, honesty and competence.

4.4. Receiving Gifts and Tips:

No employee is not permitted to receive gifts, tips or services either given to him or to any member of his family or friends, which is granted as a result of employment with Mercury MENA, with the exception of moral gifts granted during work.

Employees shall not receive bribes or any financial payments that may affect work decisions.

Employees shall not receive any amount or financial compensation related to their job.

4.5. Reporting non-compliance

The standards addressed in this code of ethics and conduct represents the core of Mercury MENA's group culture and commitment. Group-wide and uniform compliance is essential and every employee is responsible for upholding these principles.

- All employees are required to report any suspected or observed violations of the law, of this code of ethics of company policies – or if they are asked to do something that might be a violation. Reports may be made to your immediate supervisor or manager, or directly to the company HR manager.

- Confidentiality will be maintained to the fullest extent possible. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated and subject to disciplinary action. The same applies to any intentional abuse of these reporting processes.
- It is also a breach of this Code of Conduct to fail to report a violation or suspected violation that employees know about or to refuse to cooperate with the investigation of a suspected violation. See Paragraph III above.

5. Employees behaviour:

5.1. Work performance:

Employees are expected to fully perform their responsibilities and duties including supervisory tasks, professional treatment with others, working as part of the team and maintaining work quality and quantity.

5.2. Appearance:

Employees are expected to attend the workplace in an appropriate and elegant appearance that matches the nature of work.

If the Company supplies an official uniform for the employees, then they are expected to comply and apply during official working hours and it is not allowed to use it outside Mercury MENA.

5.3. Attendance:

Employees have to come to work on time and not to exceed times given to lunch and rest breaks. Employees are also expected to remain at their workplace to the end of the working day. Departure times shall be specified before a certain period in coordination with the immediate superior.

5.4. Safety:

Employees shall perform their work in a safely manner that does not jeopardise other employees. Employees are also expected to maintain safety and health regulations and to immediately report accidents.

5.5. Smoking:

Smoking is prohibited on all premises and facilities of Mercury MENA, except in designated areas.

5.6. Behaviours with colleagues:

The people who work at Mercury MENA come from many different countries, backgrounds and cultures. We can only appreciate the contribution of each individual if we observe normal standards of courtesy and respect when interacting with one another.

Mercury MENA will also be judged by outsiders according to the way they are treated in their business dealings with the company. Clear and regular communications, diversity, equality of opportunity and upholding health and safety are essential to fostering a work environment in which everyone will feel comfortable.

We foster regular and open communication between managers and their teams and believe it is a key to success. This communication, which usually takes the form of meetings and briefings, should cover business strategy, long term objectives and short term priorities. Communication between employees and their superior should include making clear how employees are contributing to Mercury MENA business goal.

Employees have a right to receive their superior's assessment of their performance, which is expected to ascertain progress and, where appropriate, to include plans for further development.

Employees shall encourage their colleagues to comply with the requirements and policies of the Code of Professional Ethics.

Employees shall be characterised with justice and support to all their colleagues.

Employees shall attribute any achievement to the employee who made such an achievement and not to themselves.

Employees shall support their colleagues for professional progress.

Upon examining accuracy of another employee's work, this shall be done in a logical way.

Employees shall not unnecessarily interfere in the work of others.

Employees shall not discriminate between employees or annoy any employee, job applicant, customer or visitor. Mercury MENA views diversity as an asset.

Employees must conduct their business activities with co-workers, customers, stakeholders and business partners with respect for all people without regard to differences or similarities, regardless of gender, nationality age or physical ability. Mercury MENA hires and promotes people based on their abilities. Employees should not engage in or support discrimination in hiring, compensation, access to training, promotion, termination, and retirement based on gender, age, ethnic and national origin, caste, religion, disability, sexual orientation, or political affiliation.

Employees are not permitted to refuse working or cooperating with any other employee due to racial discrimination or any other reason.

5.7. Children:

Employees are not permitted to bring their children and relatives to the workplace or leave them unsupervised on Mercury MENA premises and facilities during working hours.

5.8. Visitors:

Unless for any reason related to business, employees are required to inform their friends and relatives not to visit them during workings.

6. Harassment Policy:

We work to create an environment free of harassment. Employees won't feel comfortable at Mercury MENA if they, their co-workers or anyone who has business dealings with Mercury MENA faces harassment. Harassment – be it face-to-face, written, electronic or verbal – won't be tolerated.

Harassment can take many forms. People may feel harassed by slurs, intimidating or aggressive acts or words, by derogatory jokes or inappropriate gestures or by unwelcome physical or verbal conduct. Harassment can also be the communication or display of offensive material linked to any of the aspects of diversity mentioned above, such as gender, religion, race, nationality, sexual orientation or physical ability.

Mercury MENA is responsible to provide a sexual harassment-free environment. This policy does not include common compliments accepted by the society, but includes undesired behaviour that may lead to personal injury for another employee and weakening morale, and accordingly, negatively affecting the performance efficiency of the employee and his colleagues. When an employee realises that a sexual harassment behaviour has occurred, he shall raise a complaint to the Human Resources Department without fear from any reaction by any other person.

The Group encourages reporting misbehaviour as a preliminary step for running an investigation and removing any kind of harassment.

7. Nepotism:

The basic criterion of selecting, employing and promoting any employee shall depend on qualifications and performance assessment. Family, marriage or partnership relation shall not grant any preference to or obstruction against employment, which shall depend only upon employment standards set by the Company.

The purpose of this policy is not to discourage employing relatives, but to affirm that selection and assessment criteria are qualifications and efficiencies.

If a family member is competent for a certain job, it is possible to employ him. However, there shall be no family relationship between him and his direct superior, as this may affect employment and assessment decisions, as well as salaries and benefits. Employees are not allowed to start a business activity or work with any member of their family or any company directly connected with any member of their family.

8. Mercury MENA Properties:

We are all part of the Mercury MENA team. Show respect and support for your colleagues and their aspirations by caring for the environment you and they work in, the information systems, equipment and other facilities needed for each of us to do the best possible job. Helping each other to succeed also hinges on how we handle positions of authority Access to privileged information and potential conflicts of interest.

Employees are deemed responsible for the properties of Mercury MENA under their responsibilities such as keys, employee's identification cards and any other devices or equipment given to employees while performing their duties and responsibilities. Computers, faxes and photocopy machines are not restricted to personal usage. It is restricted to sell or exploit any goods or services owned by Mercury MENA for personal benefit unless agreed by the company's management.

9. Conflict of Interests

We avoid and manage conflicts of interest. Employees of Mercury MENA are responsible towards the company, and they are committed not to take any action that may lead to contradiction between their personal interests and the company's interests. Conflicts of interest can arise when personal interests or family and any other allegiances are at odds with the interest of the company. We can avoid conflicts of interest if we are aware of the challenge and take the necessary action. In general, we should avoid situations in which personal interests, outside activities, financial interests, or relationships conflict or appear to conflict with the interests of Mercury MENA and not allow business dealings on behalf of the company to be influenced by personal considerations or relationships.

Conflict of interest may arise in any of the following forms:

- Any employee shall not to have any direct or indirect financial benefit from any supplier or client of the company.
- Any employee shall not gain any discounts or personal benefits not granted to other employees.

- Any employee shall not be engaged in any outside work, either directly or indirectly, where he may compete or jeopardise the Company's interests and his responsibilities and duties.
- Any employee shall not be engaged in any part-time job during regular working hours of the company.
- Any employee shall not practice any personal works or take advantage of Mercury MENA. Any employee shall not be engaged in any outside work, either directly or indirectly, where he may compete or jeopardise the company's interests and his responsibilities and duties, properties for personal purposes.
- Any employee shall not exploit his position in the company to gain any privileges or personal advantages.
- Any employee shall not exploit his authority to gain any advantage, profit or personal benefit for himself or for any member of his family or for a friend.
- Employees who think they may be in a "conflict" must inform their manager or human resources representative so that the company can determine whether a conflict exists. They will be advised of the proper actions to take, in line with the rules issued by Mercury MENA.

10. Confidentiality

10.1. Maintaining Secrecy:

The employee is responsible to maintain secrecy and integrity of all works, activities, business secrets, files and documents related to Mercury MENA and avoid illegal disclosure to any other parties.

The employee shall not disclose any information related to security, Human resources payroll and documents, or any financial information that has not yet been made public. The said information shall not be disclosed to any other party. The employee shall keep confidential the company's relationships and trading transactions with suppliers and brokers and any other parties.

10.2. Documents Secrecy:

The employee shall not make copies of business letters, documents, files or any other documents related to the business and activities of Mercury MENA. The employee shall submit all documents related to the Company's works upon his employment termination.

10.3. Client Privacy:

The employee shall use any information related to clients that he maintains or has access for work purposes only.

The employee shall maintain documents related to clients and shall not disclose such information in a way that violates Mercury MENA's instructions.

11. Client Satisfaction:

The success of our clients and customers is key to Mercury MENA's success. Customers look to Mercury MENA for innovation, reliability and integrity. The standards of behaviour required in our clients relationships are designed to ensure that we consistently deliver those values and avoid mistakes that will harm our reputation.

11.1. Accuracy:

Quotations shall be clear and obvious so that the client can recognise the nature of the work to be done and obligations involved in it. We focus on Quality and strive to help our customers gain competitive advantage by adding value through the performance and quality of our power, mechanical technologies and Project management services.

11.2. Response:

All clients' enquiries and all precautions shall be taken into account in order to guarantee maximum customer satisfaction. Mercury MENA shall set a proper and efficient technique to deal with customers complaints.

11.3. Fairness:

All sales activities shall be characterised with fairness towards all clients and activities shall be specifically designed to avoid any kind of complaints. We believe in a competitive, free Enterprise system because it guarantees that our hard work and innovation will be rewarded. We will lose the trust of our customers if we treat them differently from one another or conspire with competitors against them.

Mercury MENA's reputation for honesty and integrity must not be put at risk by the offer of improper payments. In dealing with public officials, political parties or their officials, or any private sector worker, Mercury MENA employees must neither offer, promise or give and undue financial or other advantage, while directly or through intermediaries, to obtain or retain business or any improper advantage in the conduct of business.

11.4. Guarantees:

The contracting activities shall not include any warranties that provide the customer extra privileges not provided by Mercury MENA.

Trust is built through transparency and honesty. To be successful on a sustainable basis, we have to build each customers trust through the integrity of our words and actions. We don't promise what we can't deliver and strive to ensure that customers, shareholders and colleagues trust us to keep our Word.

12. Relationships:

How Mercury MENA does business is crucial to its reputation and success and business partners should be seen as allies. In this section, there are guidelines on the appropriate conduct towards suppliers, agents, and consultants among others. The standards in place at a joint venture should also be compatible with those of Mercury MENA.

12.1. Ethics of dealing with Suppliers:

Our transactions with suppliers shall be characterised with honesty, fairness and legal integrity.

Suppliers shall be selected according to efficiency and quality in supplying service, technology and reasonable price.

Provisions and obligations shall be exchanged between Mercury MENA and suppliers and shall be agreed upon during the suppliers' selection process before starting the business. Such provisions shall include payment and secrecy policies adopted by the Company.

Certain provisions in dealing with suppliers:

- Employees of Mercury MENA shall not take advantage of suppliers.
- Employees of Mercury MENA shall not disclose secret information of the suppliers.
- Employees of Mercury MENA shall maintain secrecy of important information related to prices, technology or any other information, and they shall not disclose such information without a written approval.
- Employees of Mercury MENA shall solve all conflicts, disputes and claims based upon facts.

12.2. Requirements:

Mercury MENA shall follow approved purchasing systems when buying services and goods for the Company.

Mercury MENA shall undertake maximum precautions to guarantee that the supplier is supplying his goods according to highest quality and at ideal cost and delivery conditions.

Mercury MENA shall deal with the supplier who observes legal and local requirements and any other standards related to labour, environment, health and security.

Mercury MENA procurement employees shall avoid the following:

- Selecting a supplier not from the approved list of suppliers.
- Conflict of interests when selecting suppliers. This includes accepting gifts.
- Selecting a supplier and cooperating with him just because his company is owned by a relative or a friend.
- The supplier who does not provide sound or unfair work conditions.

12.3. Collaboration with Agents and Consultants

Commissions and fees paid to agents and consultants is prohibited. Employees must not agree or pay commissions or fees.

Agreements with consultants shall be shared with Senior Management.

12.4. Sub-contractors

We build ties with sub-contractors who act like us. We rely on sub-contractors to help us execute some projects and value the contribution they make to Mercury MENA's customer relationships and to the company's reputation. To protect and enhance Mercury MENA's reputation, we choose sub-contractors who will act in a manner consistent with this Code of Ethics.

12.5. Joint Ventures

We team up with like-minded partners for joint ventures and alliances. Mercury MENA strength and success also depends on building long-lasting relationships with partners that share our commitment to ethical business principles. The standards of any joint ventures should be compatible with Mercury MENA.

13. Procedures of financial control

All accounting data entries shall be documented either by contracts or by invoices. It is prohibited to falsify financial data or input false and misleading data. Any funds shall not be maintained without registering it in the approved financial records. Employees of Mercury MENA shall pay attention to any forgery in financial documents or recording exaggerated fees, such as travel and accommodation fees or invoices, or any forgery in attendance record.

Separate procedures shall be provided related to fees, obligations and personal financial compensations.

The following actions will require stringent punishments:

- Purchasing materials unnecessary for operations of Mercury MENA.
- Expenses registered against purchases that have not been made.
- Exaggerated prices for materials that could have been obtained at lower prices from another supplier.

14. Information Technology:

We use information systems professionally, Mercury MENA's information systems are there to help us work efficiently and professionally. Generally such systems should be used for business purposes, in a manner that does not violate the rights or interests of Mercury MENA, and in rules issued by Mercury MENA.

14.1. Usage of information technology and the Internet:

Mercury MENA makes the Internet available for its employees to enhance efficiency and effectiveness. However, although this tool aims at assisting employees to complete their duties, they may misuse it.

The Company is allowed to monitor the Internet and e-mails and to examine existing files.

Employees are permitted to use the Internet to communicate with clients, suppliers, colleagues, other companies, governmental authorities and any work-related authority for research and information exchange purposes for the interest of the company, and not for personal interest.

Computer services of the Company shall not be used in a way that violates systems and regulations applied in any country.

Upon using the Internet, the employee shall identify himself and his company when sending e-mail messages, and shall not send spam messages.

It is prohibited to distribute and store any kind of improper or offensive images on the premises of Mercury MENA. Such a behaviour is deemed a violation to the sexual harassment policy.

14.2. Internet Security:

Mercury MENA is allowed to prevent any employee from visiting any website or any server.

Employees are not allowed to use the Internet for spreading any virus or software that may breakdown the computer software or the network. They are also not allowed to stop any antivirus program that protects other users.

15.Environment, Health and Safety Policy:

Mercury MENA is dedicated to secure and apply sound environmental, health and safety conditions. It is our duty to our colleagues, their families and their communities to safeguard the health and safety of every employee at work. Mercury MENA is required to maintain safe operations that fulfil regulations of environment, health, safety and security to compliance with applicable laws and regulations.

Herein are some requirements for maintaining a healthy and safe work environment:

- Mercury MENA shall alleviate harmful environment emissions, reduce usage of harmful materials and minimise risks upon providing various services.
- Mercury MENA shall maintain a safe and harm-free work environment.
- Mercury MENA shall pay attention to local and international environmental regulations.
- Mercury MENA shall prevent the following conditions:
- Not using personal protection equipment such as shoes, eyeglasses, headphones, etc...
- Exposure to uncovered and unsafe electrical wires.
- Working on electrical equipment without following the relevant instructions.
- It is also imperative to report dangerous conditions and other unacceptable health, safety, or environmental conditions immediately so that workplace accidents are minimised and corrective actions can be taken.