

CODE OF ETHICS AND BUSINESS CONDUCT

The success of Creative Hospitality Services is dependent on the trust and confidence the company earns from its employees, customers, and shareholders. Creative Hospitality Services gains credibility by adhering to its commitments, displaying honesty and integrity, and reaching its goals solely through honorable conduct.

It is the policy of Creative Hospitality Services to provide a Code of Ethics and Business Conduct to all employees to guide proper business conduct. Creative Hospitality Services expects all employees to observe the highest standards of ethics and integrity in their conduct and actions. This means following a basic code of ethical behavior that includes the following:

Principle 1: Honesty, Integrity, and Fair Play

Creative Hospitality Services and its staff are fully committed to the principle of honesty, integrity, and fair play in the delivery of services and goods to the public. All staff should ensure that the business, its operations, systems, financial and procurement functions, staff promotions, or staff recruitment, but not necessarily limited to these functions, are dealt with in an open, fair, and impartial manner. Common sense must prevail.

This Code of Ethics and Business Conduct sets out the basic standard of conduct expected of all staff and Creative Hospitality Services's policy on matters specific to the acceptance of advantages and the conflict of interest that staff may encounter in connection with their official duties. This Code also applies to temporary and part-time staff employed directly or indirectly by the Creative Hospitality Services.

Principle 2: Equal Opportunity for All Employees

Creative Hospitality Services is an equal employment opportunity employer. Employment opportunities are available regardless of race, color, sex, religion, national origin, age, disability, or another legally protected status. This Principle applies to all aspects of the employment relationship, including recruiting, hiring, training, work assignment, promotion, transfer, termination, and wage and salary administration.

**** It must be noted that Creative Hospitality Services’s policies support the structure of Saudi Labor Law and that the Law supersedes any policy ****

Principle 3: Safety, and Health Practices

Creative Hospitality Services is committed to an injury-free and illness-free workplace that is operated in an environmentally sound manner in compliance with all relevant laws and regulations that protect worker safety and the environment. Employees should perform work in a safe manner and in accordance with Creative Hospitality Services’s published safety and security policies and procedures. In compliance with new Ministry regulations, employees must be fully aware of and practice with commitment to the requirements for the prevention of **Covid-19**.

Principle 4: Fair Competition

Creative Hospitality Services's policy will prohibit any anti-competitive practices which could affect binding, restraining, or distorting competition, as well as any practices of unfair competition.

Accordingly, Creative Hospitality Services’s employees cannot agree (formally or informally) with competitors to share prices or any other conditions of transaction; to limit or control the production, commercialization, technical development or investment; to manipulate or divide markets or sources of provisioning; to participate with fake offers in tenders or any other forms of competitions for offers; to limit or restrain access to the market and the freedom of competition for other enterprises; to apply unequal conditions for equivalent performance to commercial partners, creating in this way a disadvantage in competition; to condition signing and acceptance of contracts by partners for supplementary obligations which, by their nature or according to commercial usage, have no connection with the subject of such contracts.

Creative Hospitality Services employees are prohibited from performing any act of unfair competition manifested through the misappropriation of clients of Creative Hospitality Services by using the relations with such clients outside of their typical work function. Further, any dismissal or attraction of employees of Creative Hospitality Services for the purpose of setting up a competing business to capture customers of Creative Hospitality Services is prohibited. At the same time, Creative Hospitality Services employees must not take actions that harm the legitimate interests of consumers of Creative Hospitality Services’s products and services.

Principle 5: Governance and anti-corruption

Creative Hospitality Services has zero tolerance for corruption. No employees can ever offer to provide anything of value directly or indirectly to government officials or business partners to secure an undue advantage. Creative Hospitality Services prohibits payment, offers of payment as well as anything of value directly or indirectly with the purpose of influencing or obtaining undue business or personal advantage.

Third parties will only be contracted to perform tasks that aid business interests, provided that fees to be paid are reasonable; all arrangements are clearly documented, and arrangements are in compliance with Creative Hospitality Services's policies.

Principle 6: Financial Reporting

All financial transactions of Creative Hospitality Services must be duly recorded to permit the preparation of clear financial statements in conformity with generally accepted accounting principles. No false or misleading entries may be made in the books and records of Creative Hospitality Services for any reason, and no employee may engage in any arrangement that results in such a prohibited act.

No undisclosed or unrecorded fund or asset of Creative Hospitality Services may be established for any purpose. No payment on behalf of Creative Hospitality Services (including those by cash) may be done without adequate supporting documentation or made with the intention or understanding that any part of such payment is to be used for any purpose other than as described by the documents supporting the payment.

From time to time, Creative Hospitality Services may publish policies or information on financial reporting, with disclosure and compliance to reinforce the financial reporting expectations in this Code. All employees at any level are expected to implement and strictly follow these policies.

Principle 7: Restrictive Agreements with Third Parties

Creative Hospitality Services does not condone activities that seek to gain an unfair competitive advantage. No individual may engage in any activity which violates any valid restrictive agreements entered into by that individual for the benefit of a third party, and no individual may, directly or indirectly, use or disclose any confidential information or trade secrets of a third party, that the individual obtained while employed by or associated with a such third party.

Principle 8: Government Contracts and Services

Creative Hospitality Services is committed to complying with all applicable laws and regulations relating to government (public procurement) contracts and services and to ensuring that its reports, certifications, and declarations to government officials are accurate and complete and that any deviations from contract requirements are properly approved.

Principle 9: Acceptance of Advantages

It is the policy of Creative Hospitality Services to prohibit all staff from soliciting or accepting any advantage from any persons having business dealings with Creative Hospitality Services (e.g. clients, suppliers, contractors). Employees who wish to accept any advantage from such persons should seek advice and permission from the responsible Manager or Human Resources officer.

Any gifts offered voluntarily to the staff in their official capacity are regarded as gifts to Creative Hospitality Services and should not be accepted without permission. By default, staff should decline the offer, if the acceptance could be perceived as against the interests of Creative Hospitality Services, or that of society, or lead to complaints of bias or impropriety.

For gifts presented to staff in their official capacity and of low nominal value (below SAR200), the refusal of which could be seen as unsociable or impolite can be exceptionally accepted. In other circumstances, the staff should seek clear (i.e. in writing) and immediate (within 5 days from the offer) consent from Management or the Human Resources Officer to accept the gifts.

The Human Resources Officer should keep proper records of the applications and permissions. Each permission will indicate the name of the applicant; the occasion of the offer; the nature and estimated value of the gift, and whether permission has been granted for the applicant to retain the gift or other directions that have been given to dispose of the gift. The permissions must be signed and dated by both the Human Resources Officer and the applicant. Possible ways of disposal of such gifts are listed in Appendix 2.

Principle 10: Conflict of Interest

A conflict-of-interest situation arises when the “private interests” of the staff compete or conflict with the interests of Creative Hospitality Services. “Private interests” means

both the financial and personal interests of the staff or those of their connections including family members and other close affiliates; personal friends; the clubs and societies to which they belong; and any person to whom they owe a favor or are obligated in any way.

Staff should avoid using their official position or any information made available to them in the course of their duties to benefit themselves, their affiliates, or any other persons with whom they have personal or social ties. They should avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with Creative Hospitality Services. Failure to avoid or declare any conflict of interest may give rise to criticism of favoritism, abuse of authority, or even allegations of corruption.

In particular, staff involved in the procurement process should declare a conflict of interest, if they have a beneficial interest in any company which is being considered for selection as an Creative Hospitality Services supplier of goods or services. Appendix 3 provides some examples of conflict-of-interest situations that may be encountered by staff.

When called upon to deal with matters of Creative Hospitality Services for which there is an actual or perceived conflict of interest, the staff member should make a declaration in writing to the Human Resources Officer. He should then abstain from dealing with the matter in question or follow the instruction of the Human Resources Officer who may reassign the task to other staff.

Principle 11: Misuse of Official Position

Staff who misuse their official position for personal gains or to favor their relatives or friends are liable to disciplinary action up to and including termination. Examples of misuse include a staff member responsible for the selection of suppliers, giving undue favor, or leaking information to his/her relatives with a view to giving away an undue advantage.

Principle 12: Handling of Classified or Proprietary Information

Staff is not allowed to disclose any classified or exclusive information to anybody without authorization. Staff who have access to or are in control of such information should at all times provide adequate safeguards to prevent its abuse or misuse. Examples of misuse include disclosure of information in return for monetary rewards or use of information for personal interest. It should also be noted that unauthorized

disclosure of any personal data may result in a breach of the applicable legislation on privacy.

Principle 13: Property of Creative Hospitality Services

Staff that has been given access to any property of Creative Hospitality Services should ensure that it is properly used for the purpose of conducting Creative Hospitality Services's business. Misappropriation of the property for personal use or resale is strictly prohibited, and abuse of this property will not be tolerated.

Principle 14: Outside Employment

Employees who wish to take up paid outside work, including those on a part-time basis, must seek written (dated and signed) permission and guidance from the Human Resources Officer before accepting the job. Approval will not be given if the outside work is considered to be in conflict with the interest and values of Creative Hospitality Services. Moreover, expatriate employees who are directly employed by Creative Hospitality Services or contracted to Creative Hospitality Services, may not take on outside employment.

Principle 15: Compliance with the Code

It is the personal responsibility of every staff member to understand and comply with the Code of Ethics and Business Conduct. Every member of staff shall sign a Declaration of Principle for this purpose. The Human Resources Officer or other mandated employee will keep declarations of Principle.

Higher-ranked employees should ensure that their subordinates understand and comply with the standards and requirements stated in the Code. Any doubts of interpretation or problems encountered, as well as any suggestions for improvement, should be addressed to the Human Resources Officer for consideration and advice.

Any staff member who violates any provision of the Code will be subject to disciplinary action up to and including termination. In cases of suspected corruption or other criminal offenses, a report will be made to the appropriate authorities.

Principle 16: Sanctions

Creative Hospitality Services can take prompt and appropriate remedial action in response to violations of the Code. Any employee who engages in conduct prohibited by the Code as determined by the Human Resources Officer and Managers will be subject to disciplinary action and sanctions in accordance with the labor law.

Once a complaint has been placed, the Human Resources Officer will initially analyze it and he/ she may meet privately with the applicant to understand the facts surrounding the issue. Following a fact-finding phase, an investigative meeting could be held with the employee who alleged the violation, to further ascertain the facts and receive observations. The decision should be issued in writing (dated and signed), indicating a summary of the facts, reference to the specific violation, and motivations.

The sanction may be under the form of:

- Warning.
- Private or public letter of reprimand.
- Transfer to other tasks or units.
- Suspension from duties.
- Termination or removal.

The Human Resources Officer shall report serious violations to the appropriate government or legal authorities.

Principle 17: Reporting

Employees have a responsibility to promptly report to Creative Hospitality Services any violation of the Code. Creative Hospitality Services shall put in place an appropriate mechanism (i.e., complaints/suggestion boxes, telephone, emails, etc.) to allow employees to address communications to the Human Resources Officer with the highest degree of trust and confidentiality.

Employees will not be disciplined or retaliated against for reporting violations in good faith. Retaliation against any employee for reporting policy violations, or for testifying, assisting, or participating in any manner to inspections is strictly prohibited. Any employee who believes he or she has been subjected to or has witnessed retaliation must immediately report the alleged retaliation to the Human Resources Officer.

Principle 18: Human Resources Officer

The Human Resources Officer shall be a person of trust, independence, and competence. He/ she should be prepared, trained, and/ or certified in dealing with matters related to this Code of Conduct.

The Human Resources Officer shall perform his duty with the utmost tact, confidentiality, respect, fairness, and proficiency. The Human Resources Officer will handle day-to-day compliance matters, including:

- Receiving, reviewing, investigating, and resolving concerns and reports on the matters described in this Code.
- Interpreting and providing guidance on the meaning and application of this Code.
- Reporting periodically and as matters arise to senior staff of Creative Hospitality Services on the implementation and effectiveness of this Code and other compliance matters and recommending any updates or amendments to this Code deemed necessary or advisable.

Appendix 1: Definition of Advantage and Examples of Prohibitions

“Advantage” means:

- Any gift, loan, fee, reward, or commission consisting of money or of any valuable security or of other property or interest in property of any description
- Any office, employment, or contract.
- Any payment, release, discharge, or liquidation of any loan, obligation, or other liability, whether in whole or in part.
- Any other service, or favor, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil, or criminal nature, whether or not already instituted.
- The exercise or tolerance from the exercise of any right or any power or duty.
- Any offer, undertaking, or promise, whether conditional or unconditional, of any advantage within the meaning of any of the preceding paragraphs above.

Creative Hospitality Services employees **DO NOT**:

- Solicit, accept, offer, promise, or pay a bribe either directly or through a third party. This includes “facilitation of payments”.

- Accept transportation, travel expenses, or accommodations for trips that are not business related.
- Offer or accept donations for parties, including going-away parties.
- Solicit or accept personal discounts that are not available to all employees or available to the general public.
- Offer or accept personal rebates or refunds resulting from Creative Hospitality Services's purchases.
- Offer or accept excessive or inappropriate meals or entertainment. Generally, an excessive amount would be an amount you would not normally spend on yourself.

Gifts provided should not give the appearance of unduly influencing, obligating the recipient, or providing an improper advantage to Creative Hospitality Services. Gifts or entertainment should not react adversely to Creative Hospitality Services or the recipient and the gifts should be given openly. The gift or entertainment should be accurately accounted for in the employee's expense report and on Creative Hospitality Services's books and records. If you have questions regarding whether or not to accept or offer a gift or invitation, consult with the Human Resources Officer.

Appendix 2: Examples of ways to dispose of gifts presented to a staff member in his official capacity

- If the gift is of perishable nature (e.g., food or drink), it shall be shared among the office or during an activity organized by Creative Hospitality Services.
- If the gift is a useful item, it may be sent to a registered charitable organization that is supported and sanctioned by Creative Hospitality Services. Donations must be approved by the Public Relations Committee.
- If the gift is of historical or other interest, it may be sent to a library or museum.
- If the gift is suitable for display (e.g., a painting, vase, etc.), it may be retained for display on Creative Hospitality Services's premises.
- If the gift is a personal item of low value (below SAR200), it may be retained by the recipient.

Appendix 3: Examples of Conflict-of-Interest Situations

- A staff member who has a financial interest in a company that is being considered for selection as Creative Hospitality Services's supplier of goods or services.
- A staff member who accepts frequent gifts from the Creative Hospitality Services's suppliers or contractors.

Declaration of Principle

I, the undersigned employee, declare that I understand the contents and the intentions of this Code of Ethics and Business Conduct, and understand that its structure and governance are a formal policy of Creative Hospitality Services.

I declare that I will govern myself with zero tolerance for any infringement of this policy and that any infringement of the Code will result in disciplinary action, up to and including termination.

Name of Employee:

Anastasiia Harkava

Signature:

Date:



In witness thereof:

Name of Human Resources Officer or Manager:

Signature:

Date:
