

Leading with Values...Working together, we can achieve great success by doing the right thing.

The Code of Conduct informs BP of the following:-

- Maintain awareness and comply with all applicable laws and regulations of the countries of their operation
- Must disclose information on any situation that may appear to present a conflict of interest
- HSA has a zero-tolerance policy with regards to the Compliance Breach.
- Follows same values and ethics .
- Don't engage in corrupt practices.

HSA Group expects all of its Business Partners to comply with the law and act ethically in all matters.

This Code contains general requirements applicable to all BP to HSA Group. Particular BP contracts may contain more specific provisions addressing some of these same issues. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent there is any inconsistency between this Code and any other provision of a particular contract, the other provision will control.

Conflicts of Interest

Our Employees should have no relationship, financial or otherwise, with any supplier, customer or other business partner that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of HSA Group.

Friendships outside of the course of business are inevitable and acceptable, but suppliers should take care that any personal relationship is not used to influence HSA employee's business judgment.

If a Business Partner employee is a family relative (spouse, parent, sibling, grandparent, child, grandchild, mother- or father-in-law) to an employee of HSA Group, or if a BP has any other relationship with an employee of HSA Group that might represent a conflict of interest, the BP should disclose this fact to HSA Group or ensure that HSA's employee does so.

Gifts, Meals and Entertainment

Our Employees are prohibited from offering or accepting anything more than modest gifts, meals and entertainment from/to Business Partners. Ordinary business meals and small tokens of appreciation such as gift baskets at holiday time generally are fine but should be reported by employees, but BP should avoid offering to/ accepting from HSA employees travel, frequent meals or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed.

Business and Financial Records

Both the BP and HSA Group must keep accurate records of all matters related to the supplier's business with HSA Group. This includes the proper recording of all expenses and payments. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

Bribery

BP acting on behalf of HSA Group must comply with applicable global corrupt practices, laws & regulations, as well as all local laws dealing with bribery of government officials. In connection with any transaction as a BP to HSA Group, or that otherwise involves HSA Group, the BP must not transfer anything of value, directly or indirectly, to any government official, employee of a government-controlled company, or political party, in order to obtain any improper benefit or advantage. BPs must keep a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of HSA Group, or out of funds provided by HSA Group. BPs must furnish a copy of this accounting to HSA Group upon request.

Protecting Confidential Information

BPs should protect the confidential information of HSA Group. BPs who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by HSA Group. If a BPs believes it has been given access to HSA's confidential information in error, the BP should immediately notify its contact at the Company and refrain from further distribution of the information. Similarly, HSA should not share with anyone the BP's information, if the BP is under a contractual or legal obligation not to share the information.

Reporting Potential Misconduct

BPs who believe that an employee of HSA Group or anyone acting on behalf of HSA Group, has engaged in illegal or otherwise improper conduct, should report the matter to the Company. The BP can contact the Ethics & Compliance Office at Compliance@hsa.com.ye, or Whistleblowing@hsa.com.ye, or use HSA Ethics Line at www.hsa-yemen.ethicspoint.com. A BP's relationship with HSA will not be affected by an honest report of potential misconduct.



Our employees integrate compliance into all aspects of their role and we articulate and encourage adherence to best practice in international corporate compliance across all our business functions.

Assumptions

- This Document describes some of HSA's core business conduct expectations for suppliers and other external business partners. For clarification purposes, this list is not exhaustive, and there may be additional expectations/guidelines depending on the goods/services provided. These will be provided on a case by case basis, as relevant.
- All Business partners, including suppliers, vendors, contractors, consultants, agents, shareholders and other providers of goods and services who do business with or on behalf of HSA ("BPs") are expected to follow the business partners Code and all other relevant policies as a condition of doing business with HSA and its affiliates. BPs are also expected to communicate and apply the BPs Code and relevant policies throughout their supply chain.
- HSA Business Partners shall comply with all applicable wage, working hours, and benefits laws and regulatory requirements. BPs should also strive to meet international standards for working hours and rest periods including: Prohibit all forms of forced or compulsory labor, Prohibit use of child labor, Treat employees fairly, Respect employees' rights and Provide safe and healthy working conditions.
- HSA Business Partners shall carry out operations with care for the environment and comply with all applicable environmental laws and regulations.
- HSA Business Partners shall compete fairly for HSA's business and conduct all such business on behalf of HSA in a lawful manner.
- For all community related concerns and suggestions, HSA develop anonymous Grievance channel which guarantee no negative consequences for all those who report, you can use www.community-hsa.ethicspoint.com