



I. Purpose

The Union Iron and Steel Code of Ethics forms the basis of our relationship with shareholders, customers, business partners, employees, suppliers, communities and government. Although our stakeholders entrust our management team to look after the financial and social wellbeing of our Company, all our employees have an important part to play in abiding by and living out our group's values and ethics.

This code serves as more than a collection of high-sounding statements. It has a practical value in our day-to-day business and each one of us must follow these principles in the spirit, as well as the letter.

II. Scope

This policy and its procedure applies to all Union Iron and Steel LLC employees.

III. Responsibility

Originate	:	Human Resource Manager
Review	:	Factory Manager/Finance Manager/ Business Development Manager
Approval	:	General Manager
Execution, Implementation, and Maintenance	:	HOD / Directors / Senior Managers / Managers / Supervisory staff/ Human Resources

IV. Abbreviations and Acronyms

BU	:	Business Unit
UIS	:	Union Iron and Steel LLC
BUH	:	Business Unit Head
HR	:	Human Resources
HOD	:	Head of Department
ER	:	Employee Relations
FM	:	Finance Manager
FRM	:	Factory Manager



V. Policy Values

People

We strive to have people practices that make UNION IRON AND STEEL an employer of choice, and respect the traditional rights of all the stakeholders.

Respect for each other, our customers and for the community at large.

Excellence

Excellence is defined as our ability to deliver the quality and value in the products and services we offer.

We pursue excellence in our actions and behavior through the development of critical, disciplined thinking, logic and reasoning.

Transformation

We shall focus on meeting our obligations as per the laws and more importantly, create a culture that ensures long term sustainability of the organization and all stakeholders.

Customer Focus

We shall utilize our multi-disciplinary experience and expertise to develop, package and deliver the customer focused products and services.

Innovation

We shall continuously seek and develop new and improved ways to deliver our product and services to ensure we are more efficient and effective - thus achieving the UNION IRON AND STEEL objectives.

Performance

Our individual and business unit performance shall be aligned to deliver stakeholder value and growth. We shall do this by being customer-centric in our approach.

VI. Policy Statements

1.0 Business Practice Commitment Policy Statement

- 1.1 We shall generate business through application of knowledge of our markets, timeous delivery of quality products and services and by building sound client relationships.
- 1.2 We shall at all time act in good faith in the best interests of UNION IRON AND STEEL as a whole. This applies to both external and internal business dealings and working relationships.
- 1.3 We shall operate within the laws of the country, codes of industry practice and standards laid down by statutory bodies.



- 1.4 We shall operate within the laws and custom of any other country where we do business.
- 1.5 We shall keep accurate and reliable records, which fairly reflect all business transactions in keeping with international accounting/Procurement / Sales standards, which are managed in accordance with Finance / Procurement / Sales Department policies and procedures.
- 1.6 We shall declare any conflicts of interest that may arise, including employment of family members and any business with related parties.
- 1.7 We shall not divulge confidential information about our business without prior approval.
- 1.8 We shall act with disregard for any personal ulterior or improper motive, such as personal gain.
- 1.9 UNION IRON AND STEEL Code of Ethics relates to our business practices, as well as expected conduct towards.
 - Our customers
 - Our employees
 - Our business partners
 - Our suppliers
 - Our communities
 - Our environment

2.0 Commitment to our Customers Policy Statement

- 2.1 We shall be professional in all our business dealings to maximize our reputation as the preferred supplier of construction goods and services.
- 2.2 We shall meet and exceed our agreed-upon customer requirements.
- 2.3 We shall strive to form efficient business relationships with our customers that deliver benefits to both parties.

3.0 Commitment to our Employees Policy Statement

- 3.1 We shall adhere to UNION IRON AND STEEL Policies and Procedures and apply them fairly throughout the organization .



- 3.2 All employees shall operate within an agreed framework of authority and operating guideliness.
- 3.3 We shall ensure that our working practices conform to strict and Quality standards.
- 3.4 We shall invest in the development of our employees and performance shall be rewarded.
- 3.5 We shall act in a professional manner with each other and respect one another's religious, ethnic and cultural background.

4.0 Commitment to our Business Partners Policy Statement

- 4.1 We shall maintain professional working relationship with our business partners at the same time as fostering a culture of teamwork.
- 4.2 We shall ensure that all our business partners fully understand our performance standards and requirements.
- 4.3 In keeping with international practice, agents may be appointed by UNION IRON AND STEEL to assist in country establishment and work procurement. All agents, partners and commercial agreements pertaining thereto must be approved by UNION IRON AND STEEL's most senior officer.

5.0 Commitment to our Suppliers Policy Statement

- 5.1 We shall maintain professional working relationship with all our suppliers.
- 5.2 We shall ensure that our suppliers understand our performance standards and requirements.
- 5.3 We shall not divulge confidential information to our suppliers about business state.

6.0 Commitment to our Communities Policy Statement

- 6.1 We shall consult with the communities where we operate on matters that may affect them.
- 6.2 We shall respect the value, culture and beliefs of the communities in which we operate.



7.0 Commitment to our Environment Policy Statement

- 7.1 We shall respect and care for a life (people, animals and plants).
- 7.2 We shall educate all employees on environmental issues.
- 7.3 We shall protect soils, water and air from damage through our operation as best we can.
- 7.4 We shall Rehabilitate what we can.
- 7.5 We shall control emissions from our operations and shall manage waste disposal under strict constraints.

8.0 The Application of our “Code of Ethics“ Policy Statement

- 8.1 In a work environment where the achievement of an organization’s goals is dependent on the combined efforts of all stakeholders, it is imperative that all employees abide by a code of behavior, which is supportive of the organization’s objectives. It is therefore important that employees UNION IRON AND STEEL follow our Code of Ethics through proper behavior in the workplace and that we apply ourselves diligently to our jobs.
- 8.2 In asking ourselves if our behavior is ethical, employees should answer the following questions :

Am I doing something that could possibly be illegal or seen to be illegal?

Am I doing something that is dishonest or could be seen to be dishonest?

Am I doing something that could be in conflict with the Code of Ethics?

Am I doing something that internal or external people to UNION IRON AND STEEL could view as negative or be offended by it?

If the answer to any of the above questions is “ Yes“, then an employee Should not proceed with their actions.

Employees must discuss the issue with their manager to see if there is an ethical solution to their problem.



VII. Definition

Terminology	Definition
Business Unit	A business segment that is organizationally complete and separate unit representing a specific business function that develop their own strategic direction. They still report back to company headquarters but operate as independent business organized according to their target markets. They are often large enough to have their own internal organizational divisions.
Business Unit Head	Pertains to the highest level of Executive Management of the Business Unit such as Chief Executive Officer, General Manager, and Operations Director.
Commitment	Fulfilling our obligations, duties and responsibilities as employees in a compliant way.
Stakeholders	Shareholders, customers, business partners, employees, suppliers, communities and government authorities.
Values and Beliefs	Values and Beliefs are what support the vision, shape the culture and behaviours reflecting what the company values. They are the essence of the company's identity - the principles, beliefs or ethics by which we behave in managing the company.
Code of Ethics	A code of ethics that compliments transparent corporate governance of professionally accountable companies. The code forms the basis of our relationship with shareholders, customers, business partners, employees, suppliers, communities and government.

VIII. Approvals

The approval authorities that governs Employee Relations transactions and activities are prescribed in the relevant Group HR Delegation of Authority Matrix.



Union Iron and Steel

Human Resources

Code of Ethics

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Page of 07

07 of 07

IX. Review

Power Holding Group reserves the right to amend any policy and procedure construed herein, if it shall inevitably contravene Qatar Labor Law.

From time to time, Union Iron and Steel LLC, if deemed appropriate, may make changes to this policy and relevant guidelines to improve its efficient operations.

X. Further Assistance

Any person who requires assistance with this Policy and Guidelines should initially consult their Direct Manager. Should further advice be required, the employee should contact the relevant HR Department.

XI. References

ISO Management System
Code of Conduct and Code of Ethics
UAE Labor Law

XII. Policy Summary

Policy applies to	Group-wide - all Staff Employees
Policy Status	Active
Approval Authority	HR Manager and General Manager
Date of Last Revision	Not Applicable
Date of Policy Issuance *	17 October 2017

* Unless otherwise indicated, this policy shall still apply beyond the review date.

	Name	Title	Signature	Date
Issued By	Bindu Wahid	Manager - HR and Administration		21/10/2017.