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UN Global Compact Anti - Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Recognizing the difficulties of employees and clients in the Middle East, Asia and Africa to understand international standards and practices, Gulf Catering Company's parent company Agility published a comprehensive **Code of Business Ethics and Conduct and Competition Compliance Policy** that apply to all group companies and our external relationships.

Our Code of Business Ethics and Conduct mirrors the UN Global Compact and specifically addresses the Employee conflicts of interest, gifts, meals and entertainment in the course of interacting with clients, suppliers, subcontractors and competitors.

The document further addresses business with third parties and anti-trust compliance including:

- Conducting Business with Suppliers, Vendors, Jobbers, Agents, Consultants, and Customers
- Conducting Business with Governments
- Antitrust Compliance
- Agreements among Competitors
- Monopolization

A copy of our Code of Business Ethics and Conduct and Competition Compliance Policy is attached. A new revision is scheduled for release in May 2012 - followed by extensive employee training.

Employee orientation and training covers real life situations encountered by employees and provides explanatory responses that demonstrate compliance with corporate policy. Training of management staff summarizes our Code of Ethics and Conduct, and produces a certificate of completion as managers pass a comprehensive examination.

Gulf Catering Company has a zero tolerance anti-corruption policy. The first page of our corporate Code of Business Ethics and Conduct clearly specifies a hotline number for clarifications, employee concerns and reporting. All communications are considered privileged to ensure employee trust.

Gulf Catering Company and our parent company Agility Logistics are dedicated to our Code of Business Ethics and Conduct. We staunchly defend our record of performance and strive to ensure international compliance at corporate levels.

Our audit processes include internal and external audits. External audits are conducted to ensure ISO 9001 compliance and Ernst & Young Financial audits.

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