

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 published a comprehensive **Code of Business Ethics and Conduct and Competition Compliance Policy** that apply to all group companies and our external relationships. In 2012, we published an Employee Handbook containing the Code of Business Ethics & Conduct.

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.

In 2012, we implemented **mandatory Code of Conduct training sessions** that included seven one-hour training sessions in all aspects of employee conduct. Training was mandatory for all employees and **100% compliance**. Training included real-life situations that are frequently experienced in our company and throughout the region in which we operate.

Employees signed for **Employee Handbooks**, pledging compliance and understanding. Each training session ended in publicizing an **employee hotline** where issues could be anonymously brought to attention of our parent company compliance team.

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.