

Letter of commitment

On behalf of the BMMI Group, I am pleased to once again reaffirm our support to the Ten Principles of the United Nations Global Compact (UNGC) and our commitment to respecting human and labour rights, safeguarding the environment, and working against corruption in all its forms.

In our annual Communication on Progress (COP), and as part of our commitment to sustainable and responsible business practices, we describe the actions we have taken to strategically integrate the Global Compact across the BMMI Group for the period: January 2018 to December 2018.

While corporate citizenship is not a new concept at BMMI, we recognise that as with any worthy endeavor, sustainability will be an on-going and continuously evolving journey. This is exactly why we aim to foster a progressive environment, to make BMMI a great place to work.

From training and development, emergency financial assistance, equality, to creating a flexible working environment-these are just a few of the things we prioritise.

Our team has been constantly reviewing initiatives and seeking relevant partnerships. From supporting individuals with disabilities to gain transferable job skills through the Employment Faciliation Training Service (EFTS) programme, to our focus on food waste reduction through our continued collaboration with Conserving Bounties - we've strategised the way we support our communities, our environment and our people.

Today, regular communication has been developed across the Group, with our Board

and the wider community about our social impact, what we are doing and why. In-line with our first corporate value—Honesty—we commit to being transparent in sharing this progress with you all, both through our annual COP and other primary channels of communication.

Our 2020 goal is to have CSR truly embedded across our operations and at the core of our different departments. We aim to drive our triple bottom line, contributing to sustainable development, enriching society and the planet through our business.

We ask for your continued feedback and partnership in this journey. Together with all of you, our focus will be to revisit our policy in 2019 and engage in stakeholder feedback to ensure our pillars remain relevant. If there is a team that can create opportunities to do more, it's ours. We will continue to search tirelessly for ways to make a greater impact as a responsible corporate citizen first and foremost.

Sincerely yours,

Marek Sheridan CEO

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About us

Based in the Kingdom of Bahrain, with 136 years of continuous operations and a growing international footprint, BMMI is a diversified retail and distribution, hospitality, shipping, contract services, logistics and supply chain group.



Powered by a worldclass integrated logistics supply chain capability, and a robust and professional support infrastructure, BMMI is one of the leading and fastest-growing private sector enterprises in the GCC region. Our business philosophy revolves around a solid commitment to 'making a difference' in everything that we do.

Uniting our global community is our Winning Hearts culture. Launched in 2003, it reflects the Group's mission: 'Winning the hearts and minds of our customers by delivering exceptional service'.

The culture embraces BMMI's corporate DNA, which consists of three main components-principles, ethics and five values: honesty, excellence, achievement, recognition and team spirit.

Over 1,500 employees located in eight countries



Listed on the Bahrain Bourse since 1999



Success based on integrity, agility & resilience



Annual turnover approaching US\$ 300 million

20 10 milestones

- BMMI launches in-house shipping agency, BMMI Shipping Services (BSS)
- Alosra supermarket awarded by the Ministry of Social Development for the recruitment, retention and development of differently abled individuals
- The first batch of trainees from the first Employment Facilitation Training Service Program (EFTS) graduate following their training at Alosra supermarket
- Alosra supermarket enters into a commercial deal with Ireland's leading food retail and wholesale company, Musgrave
- BMMI continues its support of
 Bahraini local non-profit organisation
 Conserving Bounties in order to tackle
 food waste, including sponsoring the
 First Conserving Bounties Partners
 Forum where Conserving Bounties
 and the Bahrain Supreme Council for
 Environment sign a Memorandum of
 Understanding

- BMMI was presented with the prestigious Vanguard Award, the top honour awarded by the International Stability Operations Association (ISOA), at its second annual awards ceremony held at the Mayflower Hotel in Washington, District of Columbia
- Alosra launches the Kingdom's first monthly plastic bag free week across its Bahrain-based stores, kicking off its plastic reduction journey to eliminate use of all plastic carrier bags by 2020
- BMMI supports the construction of the RIA Adult Centre (RAC)
- BMMI Djibouti gains certification in the EU Commission Guidelines on Good Distribution of Medicinal Products for Human Use (2013/C 343/01), becoming the first organisation in the Group and across the Horn of Africa to do so
- GSS sponsors the 2018 'Sudan International Mining Business Forum & Exhibition', the sole international mining event organised by the Ministry of Minerals of Sudan
- BSS joins WACO, the global freight network, as the exclusive network partner in Bahrain
- BMMI partners with Bahrain's first Women Power Summit (WPS)
- BMMI renews its commitment to the United Nations Global Compact by publishing its Communication on Progress
- Nader Trading recognised by Mars Global for achieving the highest global market share for Mars brands in Carrefour
- BMMI Djibouti contributes food items to more than 400 registered families staying in the Markazi Camp
- Alosra supermarket recognised as one of the best companies in Bahrain and the Gulf Cooperation Council (GCC) countries for their efforts to recruit local talent and provide opportunities for the local workforce

In 2012, BMMI was the first company in its sector in Bahrain to implement an Integrated Management Systems (IMS).

Under this umbrella, all management systems for quality, occupational health and safety, the environment, food safety and business continuity, were integrated. Our dedicated IMS team continues to introduce new initiatives to ensure that staff recognise their personal responsibility to contribute to the sustainable growth of the Group. This aims to improve business processes for enhanced operational efficiency, and sets consistent Group-wide standards.



Environmental management systems



Occupational health and safety management systems

ISO 22000: 2005 Food Safety Management

OHSAS 18001: 2007
Occupational Health and Safety

ISO 22301 : 2012
Business Continuity Management

ISO 14001 : 2015
Environmental Management

ISO 9001 : 2015
Quality Management

Setting the standard

IMS has expanded its support by introducing a number of key initiatives. One of the most recent is the establishment of a Pr (PMO) in 2018 to support the Group's businesses in the effective execution of projects. The PMO will initially act as an administrative function, and focus on developing project management tools and aim of the annual templates to ensure consistency across the Group.

Diibouti in being certified them by measuring as compliant with the 'EU Commission Guidelines on the Good Distribution of Medicinal Products for Human Use' in 2018. The Company is the first in the Horn of Africa the Group to discover

and across the BMMI Group to recieve this accreditation. IMS is also continuing to work with the Food Production Unit (FPU) in the rolling out of nutritional labelling for its the supermarket's packaged 'Food-to-Go' product range available products.

The Productivity Improvement ramme (PIP), which IMS launched in 2015, has achieved notable success. The programme is to help participants identify areas to improve in terms of productivity, IMS also assisted GSS and methods to assist work productivity levels using more than 19 internationallyrecognised tools.

> The PIP has enabled employees across

hidden talents through which they can truly 'make a difference'. Examples include significantly reducing and redirecting waste at Alosra, increasing online by 30 per cent; and improving supplier payment process to reduce delays through minimising manual processes.

Significantly, PIP initiatives have achieved savings in operational costs of more than BD 2 million over the past two years.



million hours without an accident or lost time incident (LTI)

*A total of 186 Health, Safety and Environment (HSE) training sessions were conducted in 2018 with over 1000 attendees from across the Group.



BMMI seeks to become a sustainable company, not just a responsible one. Following an extensive stakeholder engagement exercise in 2014, we launched our CSR policy, Nourishing Life, with three interconnected pillars: **Zero waste, Truth &** Wellbeing.

*In 2019, the team aims to revisit the CSR policy and conduct a review of the pillars, together with all our stakeholders, to remain relevant. We hope new partnership opportunities will develop in the coming years to drive more amplified communication, strategic projects and employee reach out.



Zero waste

To be wasteful and to squander resources when many are in need is a terrible thing. While the policy tackles traditional waste, BMMI also views waste differently. Wasted talent. Wasted opportunities. Wasted time & energy. Wasted potential.



BMMI's first corporate value is Honesty. This means communicating respfectfully, truthfully and transparently with customers, colleagues and with governments. It also means being true to oneself, values and purpose as a business.



As a business, BMMI believes it should play a role in nourishing and improving the quality of life for all who are associated with BMMI, including employees, customers, communities and the planet.



Social responsibility

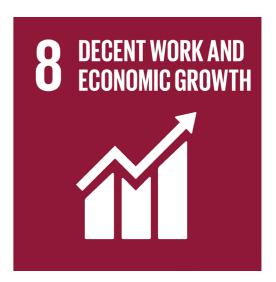
BMMI renews its commitment to the United Nations Global Compact (UNGC) by publishing its fourth Communication on Progress (COP). In our annual COP, we describe actions taken in the areas of Human Rights, Labour, Environment and Anti-Corruption to continually improve the integration of the Global Compact and its principles into our strategy, culture and daily operations.

A highlight on some of our initatives...











The SSHR project management team

A holistic approach to tackling waste

- Through a collaborative project by a cross-functional team, BMMI launched an Employee Self Service platform for HR. The new system empowers our employees because it is focused on managing your own information and having it easily accessible and visible to you. Besides boosting internal customer satisfaction through faster and more streamlined processes, the system also offers enhanced security of data, with strict security measures and protocols in place that will further support the privacy and confidentiality needs of our employees. Additionally, it takes the burden of monotonous and tedious tasks off the shoulders of the HR team, which will help with efficiency and engagement. The system assists in preventing wasting our resources, whether it's time, talent and very importantly paper! With the new system being entirely paperless, and the fact that we have over 11,262 transactions processed on average per year, this saves us a ton of paper that HR would've used annually for these processes. That's a great milestone for the Group.
- Our zeal to serve the community is also reflected in our efforts to reduce food waste by strengthening our ties with Conserving Bounties, a social enterprise which specialises in providing meals to families and individuals in need in Bahrain. The team has worked together with the Bahraini organisation to collect bakery items and ready to eat meals close to expiry. Up to date, BMMI's contribution accounted for over 70,000 meals.



95,000

That's how many plastic bags we use a week. It's time to change, but we need your help.

#OurJourneyStartsToday

Championing positive change

We continue to equip the workplace to support diversity based on needs, such as providing parking spots for expectant mothers, creating a more flexible working environment for millennials, and leveraging the competencies of differently abled individuals in the workplace. One major example of this is being the business host for an Employment Facilitation Training Service (EFTS) programme, which provides differently abled individuals with opportunities to gain transferrable job skills through practical training. BMMI is also hosting the second batch of EFTS students who started their training in Q4 of 2018 for a period of three months.

At Alosra, our mission is to sustainably remove non-recyclable plastics and excess packaging within our control and where possible by 2025.

A very exciting initiative the team embarked on in collaboration with our Alosra supermarket is a plastic reduction journey. Alosra launched its first Plastic Bag Free Week (PBFW) on November 18 of 2018, saving 95,000 bags from ending up in the landfill during that week alone.









PBFW will continue on every month in 2019 as part of a plan that is in line with Alosra's goal to eliminate all its plastic carrier bags by 2020.

*Click on any of the images above to take a look at an educational video about the initiative.

In line with our commitment to positively influence the communities in which we operate, strategic donations were made in 2018 to support a number of organisations we have long standing relationships with, including the Migrant Workers Society and the Bahrain Breast **Cancer Society, to support** their ongoing initiatives.



BMMI supports the establishment of the RIA Adult Centre

BMMI supported the construction and inception of the RIA Adult Centre (RAC) in 2018. A transportation vehicle was also purchased using the donated funds and the centre is now helping differently abled individuals develop crucial life skills in parallel with work experience opportunities.

RAC's vision is to create a community where people with intellectual disabilities and their families can participate equally in the community and be valued in all aspects of society. The mission of the centre is to enable individuals with intellectual disabilities to have the opportunity to develop and utilise their potential and to contribute as an integral part of the community at all levels and across all segments.

BMMI has been a supporter of RIA for over a decade, and this latest donation will help ensure the security of the RAC project, as well as the mobility of the students. BMMI is committed to promoting awareness of the capabilities and contributions made by differently abled individuals in Bahrain. Where possible, BMMI will continue to provide effective transitioning of individuals with intellectual disabilities through pre-vocational and vocational training through its subsidiary, Alosra supermarket.

Humanitarian support in Djibouti



BMMI Djibouti participated in a monthly food ration to refugees in the Markazi camp

The camp is managed by the office of the United Nations High Commissioner for Refugees (UNHCR) in collaboration with the ONARS (National Assistance Office for Refugees and Disaster Stricken People), other governmental authorities and NGOs.

The food assistance was being provided by the World Food Programme to all registered refugees and asylum seekers. BMMI Djibouti was able to contribute by donating food to more than 400 registered families who are staying today in the camp.



BMMI Djibouti first to achieve international certification in EU Commission Guidelines on GDP

BMMI Djibouti was officially certified in 2018 by the EU Commission Guidelines on Good Distribution of Medicinal Products (GDP) for Human Use (2013/C 343/01), becoming the first organisation in the Group and across the Horn of Africa to attain this certification. As BMMI Djibouti is involved and responsible in the distribution activities of such products, compliance with the requirements defined in the GDP Guidelines is fundamental.

Being a certified company, BMMI Djibouti can ensure the appropriate competence and knowledge in handling pharmaceutical goods including hazardous products, identifying radioactive materials, products presenting special risks of abuse, and temperature-sensitive products.

Since the onset of conflict in March 2015, BMMI has supported the NGO community in responding to the humanitarian crisis in Yemen. Using its expansive cold chain distribution facility and assets in the Djibouti Free Zone, BMMI serves as a one-stop-shop for the supply chain and logistical needs of many UN and NGO organisations providing relief efforts across the Gulf of Aden. In today's volatile world, where natural disasters and conflict can take place unexpectedly, we are proud to have the ability to mount a fast, effective and safe humanitarian response is crucial to the protection of some of the world's most vulnerable populations.

Social engagement and wellbeing

The objective is to create an ideal workplace, one that supports BMMI as 'an employer of choice', where employees are truly happy to come to work, and are able to thrive. Supporting this aim, is the Sports and Social committee in Bahrain which promotes inclusivity through social interaction in a variety of inter-departmental sports and social activities. In 2019, we will open the committee to new membersto ensure our activities are in line with employee expectations and hold informal focus groups to monitor the happiness of our people.



Thanks to our management and their eagerness to support the BMMI culture, sports and social activities have been introduced in South Sudan in 2018.

A gynaecology session for female employees working in the USAID Compound. The discussion was led by a professional doctor, where issues like general hygiene, sanitation, signs and symptoms of pregnancy at early stages, family planning, menstruation period cycling, child genetic disorders at birth and negative consequences of substance abuse or heavy smoking during pregnancy were brought up.

The session was very well received, with the ladies gaining useful tips on maintaining their hygiene to help them avoid certain sicknesses. The team also started to hold other sports activities including a badminton tournament to spark some active competition. In 2019, we will ensure more employee focused activities in relation to wellbeing are introduced, across our countries of operations.

3 Our people

PRINCIPLE 1:

Businesses should support and respect the protection of internationally proclaimed human rights; and

PRINCIPLE 2:

Make sure that they are not complicit in human rights abuses.

BMMI has a total headcount of 1,732 people who are highly diversified by location, nationality, gender and age. They are located across eight countries: Bahrain, Saudi Arabia, Iraq, Djibouti, Kenya, Sudan, South Sudan and Ghana. The highest concentration of staff is in Bahrain at 47.2 percent followed by Sudan with 29.7 percent. However, total employees located outside Bahrain in the Middle East and Africa exceeds 900 people, which represents more than half of the Group's headcount.

BMMI has never obstructed employees rights to exercise freedom of association and collective bargaining. There has been zero incidents of child labour, or forced labour in 2018.

Employees represent around 40 different nationalities, which makes BMMI a truly global community. African countries account for the highest nationalisation levels due to strict local nationalisation/quota regulations, led by Sudan and Kenya. Our African operations have the highest percentage of female employees, with levels over 40 percent in South Sudan and Ghana. In Bahrain, women make up 20 percent of all staff.

Our diversity matrix

Country	Dec 2018	Head count	Male	Female	Gen Y	Gen X	Gen BB
Bahrain	817	47.2%	80%	20%	64%	34%	2%
Saudi Arabia	73	4.2%	84%	16%	84%	14%	3%
Iraq	4	0.2%	100%	0	50%	50%	0%
Djibouti	51	2.9%	73%	27%	73%	27%	0%
Kenya	37	2.1%	65%	35%	86%	14%	0%
Sudan	514	29.7%	96%	4%	61%	28%	11%
South Sudan	132	7.6%	55%	45%	68%	31%	1%
Ghana	104	6.0%	59%	41%	78%	19%	1%
Total	1732	100%	76%	24%	70%	27%	2%

BMMI benefits from a distinctly 'youthful' work force. Over 70 percent of our employees are 'millennials' (or Generation Y) aged between 18 and 38, in line with our commitment to develop the future generation. Next comes those belonging to Generation X, with 26 percent aged between 39 and 48; while only 2 percent are so-called 'baby boomers' (Generation BB) who are between 48 and 78 years' old.

Measuring employee sentiment

Each year an engagement survey is distributed to our employees in Africa to measure how they rate their experience with the organisation and management. There is a clear increase in employee sentiment and satisfaction, with an overall rise in average percentages by 8.6 percent overall in comparison to 2017.

The usual Engagement Survey conducted in Bahrain was replaced with a more comprehensive Employee Engagement Insight Survey which was conducted in 2018 to cover specific employee insights across the entire group. One of the main aims was to get a better understanding of employees association with our core values. The outcome was very interesting, with BMMI highly positively associated with a few of its core values, specifically 'Excellence' and 'Team Spirit'.

The strongest associations, across all business units overall are with 'Honesty' and 'Excellence'. These values are surely lived, in a consistent way across the organisation. As such, we will continue to investigate and ensure that our 'Achievement' and 'Recognition' values are more materialised across the group with the introduction of our Winning Moments scratch cards and other intangible/ intrinsic ways of reinforcing these values as well.

GSS Engagement Survey

2018		2017
92%	of respondents would recommend GSS as an employer to a friend	78%
86%	feel that their manager motivates them *93% of those who answered this have been with us for less than 1 year	82%
94%	say GSS inspires them to do their best at work	87%
90%	feel their managers give them feedback to improve performance	84%
92%	feel that GSS provides future career prospects	80%



PRINCIPLE 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

PRINCIPLE 4:

The elimination of all forms of forced and compulsory labour;

PRINCIPLE 5:

The effective abolition of child labour; and

PRINCIPLE 6:

The elimination of discrimination in respect of employment and occupation.

Suppliers

All our suppliers are evaluated for quality and adherence to certifications including, ISO certifications for Quality Management (9001) Occupational Health & Safety (18001), Environmental Management (14001), and Food Safety Management (22000).

We continue to select our suppliers based on relevant criteria, such as qualifications, service quality, competitive prices, ethics, and reputation. In 2018, through Alosra supermarket, BMMI supported numerous local food entrepreneurs under its 'Think Local' umbrella, specifically women and other start-ups. The ultimate aim is to truly embed socially responsible procurement practices.

Grievances

There have been zero human rights grievances and direct employees can report such violations confidentially through our employee relations team via phone, email, fax, or postal mail.

Nurturing our talent

BMMI measures talent not just on technical ability but also in terms of behaviour. A dedicated Talent Management division, formed in 2015, is responsible for developing employees at all levels, focusing on the best-performing individuals with the strongest potential. The division's activities embrace the entire employee life cycle, and it is supported in areas such as recruitment by Human Resources, and internal communications by Corporate Communications.

Regular staff appraisal and evaluation is part of BMMI's culture. The traditional scoreboard with criteria for evaluating performance against set goals was enhanced in 2018 with the introduction of behavioural competencies for managers, and will be linked to their bonus from 2019 onwards.

There are numerous instances of employees being promoted to managerial positions from within the organisation, as well as examples of successful succession planning and career progression which is all supported by our strategic focus on training. BMMI enjoys a high level of retention due to its inclusive culture and very attractive remuneration and benefits packages.

In Bahrain, BMMI has truly become an 'employer of choice', and benefits from growing word of mouth referrals.

Training matters

Talent Management also incorporates learning and development, which is an area in which BMMI has made a substantial investment. Together with a comprehensive training and development curricula and programme, staff are encouraged and supported to obtain relevant professional qualifications.

Total training hours	21,252
Total training events	129
Total no. of employees undergone training	571
Total training hours for management staff	1,083
Total no. of staff who attended management cours	169
Total no. of staff who attended non-management courses	1,232
Total training hours for non-management staff	20,169
Total management staff trained	71
Total non-management staff trained	501
Average hours of training per year per employee for management staff	14
Average hours of training per year per employee for non-management staff	25
Total training hours for females	6,719
Total training hours for males	14,534
Total participants in all training events	1,401

In a recent development, the team has been working on providing in-house training for managers and staff with pressing work commitments who cannot afford time to go on extended external training courses. A more comprehensive online training system has also been introduced to support these efforts.

Environment

PRINCIPLE 7:

Businesses should support a precautionary approach to environmental challenges;

PRINCIPLE 8:

Undertake initatives to promote greater environmental responsibility; and

PRINCIPLE 9:

Encourage the development and diffusion of environmentally friendly technologies.

BMMI is an 14001 (Environmental Management Systems) certified company and has not violated any environmental laws and regulations in any of the countries in which it operates, nor has the company been subject to sanctions and/ or compliance.

Currently, under our Integrated Management Systems (IMS) department, the environmental aspects register assesses up to 80 activities impacting the environment, their significance, any legal requirements, and preventative measures to control those aspects by location. This includes spills, hazardous and non-hazardous waste management, emissions management, natural resource depletion, noise pollutions, and even contractor activities. Mitigation measures, including training, awareness, monitoring, maintenance and engineering are also part of this. The aspects register is conducted for:

- Alosra Juffair
- Alosra Durrat Al Bahrain
- Alosra Amwaj
- Alosra Nakheel
- Alosra Riffa
- Alosra Saar
- The Food Processing Unit (FPU)
- Bayader (restaurants)
- Mina Salman
- Sitra HQ

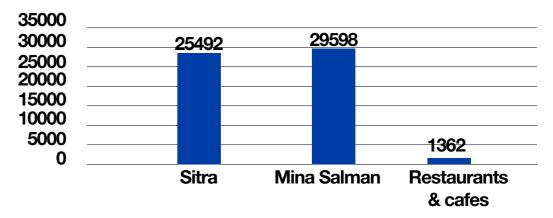
IMS related training is conducted on a regular basis in the areas of Quality, Food Safety, Health & Safety, and Business Continuity as well as Environmental Safety. A total of 186 Health, Safety and Environment (HSE) training sessions were conducted in 2018 with a total of 1069 attendees from across the Group.

Energy & waste management

The consistent implementation of international standards have resulted in Bahrain's Electricity & Water Authority (EWA) recognising BMMI for its initiatives and achievements in the areas of consumption of water and electricity, and the use of ozone-friendly gases especially in its Food Production Unit (FPU). The team continues to focus on elevating projects related to the Environment with efforts in reducing paper waste through the launch of a Documentation Audit in 2018 in preparation for a Digitisation Project in 2019.

Our IMS department also continues to set reduction targets and measures the volume of waste (paper, plastic and organic) diverted from landfill through recycling and recovery as outlined below:

Waste recycled per month 2018 (KG)



- Total KG waste collected between Jan-Dec'18 is 65,459 KG compared to 29,633 KG collected last year
 120% improvement compared to last year
- BD 2,749 received in exchange for the recycled items since Jan'18 compared to BD 1,245 last year
 120% improvement compared to last year
- Waste collected in Seef is improving as of November focus will be on improving collection in 2019

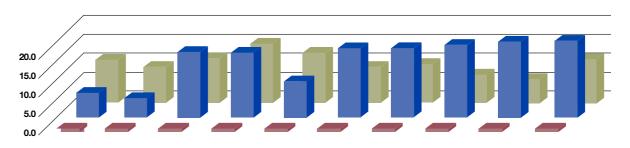
IMS monitoring & reporting – CO2 emissions

BMMI Total Fuel consumption (Petrol/ltr.)									
CO2 Emissions	Total 2018	Total 2017							
Alosra	189.6	160.5							
FMCG	125.2	113.8							
BLS	11.7	10							
Total	326.5	284.3							

BMMI Total Fuel consumption (Diesel/ltr.)										
CO2 Emissions	Total 2018	Total 2017								
Alosra	4.3	6.9								
FMCG	134.8	141.4								
BLS	497.1	510								
Total	636.2	658.3								

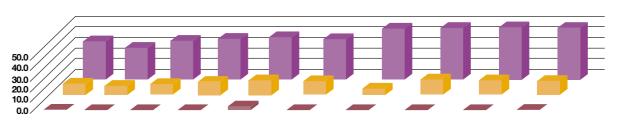
The target reduction baseline of 10% in 2018 for both petrol and diesel was not achieved due to the nature of our work with constant increase in operations and market reach.

2018 Petrol CO2 Emissions Jan-Oct (KG CO2/LITER)



CO2 emissions	Jan	Feb	Mar	Apr	May	June	Jul	Aug	Sep	Oct	Nov	Dec
Alosra	6.4	5	16.8	16.8	9.4	18.1	18.1	19	19.8	2	19.8	20.5
Mars & Consumer	11.3	9.4	11.6	15.4	13	9.3	10.2	5.9	6.1	11.4	15.6	6.1
BLS	1	0.9	1.2	1.3	1.2	0.8	0.9	0.9	0.8	1	0.7	1.1

2018 Diesel CO2 Emissions (KG CO2/LITER)



CO2 emissions	Jan	Feb	Mar	Apr	May	June	Jul	Aug	Sep	Oct	Nov	Dec
Alosra	0	0	0	0	4.3	0	0	0	0	0	0	0
Mars & Consumer	10.6	8.2	10.1	11.9	13.9	12.8	5.6	14.3	13.6	13	10.2	10.7
BLS	36.4	30.2	36.8	38.5	40.3	38.2	48.4	48.8	49.6	48.9	38.4	42.6



Anti-corruption

PRINCIPLE 10:

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

Transparency, ethical conduct, and respect for human rights are utmost priorities across our divisions and the communities in which we operate. BMMI believes that businesses should work against corruption in all its forms, both externally and internally – including extortion and bribery. BMMI's first corporate value is Honesty.

Our ethics consist of our integrity, the fact that we operate honestly, legally, transparently, incorruptly and with care towards the communities we operate in, as well as our environment.

Our employees at all levels, are empowered to voice any concerns they may have regarding any wrongdoings in the course of the company's dealings or day-to-day transactions. This covers any acts of misconduct of general, operational, legal, or financial nature, including but not limited to topics covered in our Code of Business Conduct that is scheduled to be relaunched in 2019.

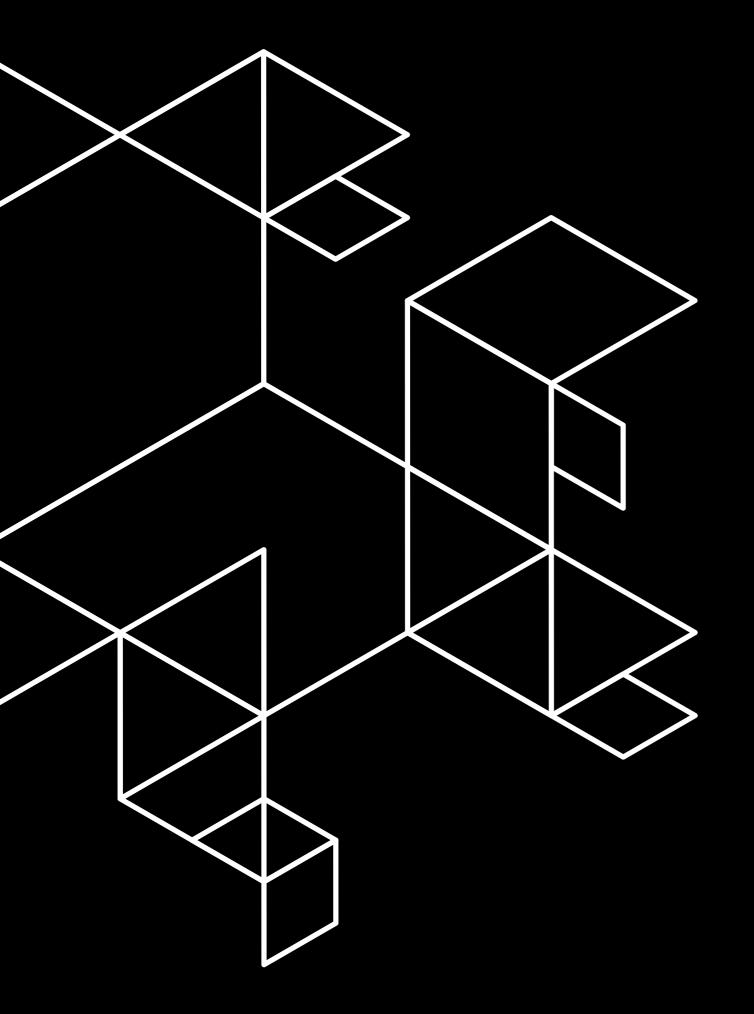
BMMI has a zero-tolerance policy for retaliation and assures that any employee who reports possible violations in good faith will not experience abuse, harassment, threats, discrimination or any adverse employment consequences as a result. Employees who are found to have retaliated against an individual who reports a suspected violation will be subject to disciplinary action up to and including termination. Not only do we have these values but we also act on them.

Corporate governance remains the responsibility of our Board with support of managerial staff. A major part of this continues to be accurate and timely disclosure of financial performance, Board constitution and ownership of the company.

In 2018, our Legal team revised and updated BMMI's Anti-Corruption and Anti-Bribery policy to reiterate our commitment to full compliance by the Company, its subsidiaries and affiliates, and its officers, directors, employees and agents, with the Kingdom of Bahrain Decree Law No. (4) of 2001 with Respect to the Prevention and Prohibition of the Laundering of Money, the Central Bank of Bahrain Rulebook, and any local anti-bribery or anti-corruption laws that may be applicable. BMMI will institute detailed procedures and standards related to training, due diligence, the recording of transactions, and other areas, to implement the terms of the policy. In particular, the Group will institute standards and procedures for:

- Direct and in-kind support for government or government officials:
- Security support for public law enforcement;
- Payments for government officials;
- Agreements with government-affiliated third parties, including those who may interact with the government on BMMI's behalf or benefit:
- Contracting with state-owned entities;
- Meals, gifts, and entertainment for government officials;
- Charitable and cultural donations to government or government officials, or to those parties affiliated with them; and
- Political contributions.

There has been no bribery or corruption cases reported during 2018.



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