

UN Global Compact

BMMI Group COMMUNICATION ON PROGRESS
2020 -2021 (COP)



LETTER OF COMMITMENT

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

In our annual 2020 – 2021 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 2020 to December 2021.

The two-year period covered in this COP are amongst the most challenging the global community has experienced in recent memory. The rapid and widescale spread of the COVID-19 pandemic presented the world with a unique set of challenges and forced many people to adapt the way they live, work, interact and support one another.

Since the beginning of the pandemic, our underpinning commitment was keeping our people safe and expanding the support we extend to the community and those most in need. From the start, we put in place several measures to ensure the safety and wellbeing of our teams, customers, clients, suppliers and all our various stakeholders.

We responded strategically by establishing a crisis committee and reviewing our business continuity plans regularly to ensure we were compliant with all health regulatory guidelines, as well as moving from office to working from home where possible, even if this meant we had to significantly change our processes and systems to adapt to the new environment. Our proactive approach to protecting people helped mitigate the impact on our teams and their ability to continue efficiently and safely offering services to our customers and clients

Throughout it all, BMMI continued to pursue its ambitious responsibility towards the community. Our list of CSR milestones for the period covered in this COP is a demonstration of our commitment to doing what is right and so are the partnerships we built with NGOs and governmental entities to extend the range of our positive impact.

This includes long term strategic and community initiatives, as well as utilising Alosra's Charitable Trust. An example of this is BMMI's partnership with The Royal College of Surgeons in Ireland – Medical University of Bahrain to sponsor

Bahraini nursing undergraduate students with full scholarships. The initiative comes in line with our efforts to nurture the local workforce, as well as recognise the significant role of nurses as healthcare practitioners at the forefront of patient care.

We also continue to invest in the wellbeing of the community. For instance, BMMI donated 55 specialised hospital beds to the Kingdom of Bahrain's Ministry of Health to help meet an urgent demand in the Salmaniya Medical Complex. Our Group also donated 28 specialised wheelchairs that were customised to meet the specific requirements of each individual recipient as part of Bahrain's Ministry of Labour and Social Development's 'Takaful Initiative 2'.

BMMI has always understood that it is our people that are the reason for our success and resilience. They continue to find innovative ways to deliver results and make a difference in everything they do. This has never been truer than in the years 2020 and 2021.

To further support our team, in 2020, we launched a corporate wellness programme that aims to support a holistic approach to wellbeing for all employees. On October 10, 2022, to mark World Mental Health Day, BMMI organised a mental health experience to help employees gain awareness and break the stigma surrounding the topic. The event marked the first initiative of what will be a focus on mental health as part of our corporate wellness programme in the year 2022 in response to the importance of supporting mental health and wellness in light of the pandemic.

Looking forward to 2022, we expect to continue our focus on supporting the community and empowering our team, while continuing to monitor and improve our impact on people and our planet. We will also continue to encourage each member of our team to strive to continue making a difference every day, in line with our responsibility to being a responsible corporate citizen.

Sincerely yours,

Marek Sheridan
CEO

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The Group's business philosophy embraces a commitment to 'making a difference' in everything it does. From developing its people, serving its customers and sustainably contributing to the communities in which it operates, BMMI strives to win hearts and minds every day.

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ABOUT US

Established in 1883 as a small shipping agency, today, BMMI is a leading private sector enterprise in Bahrain with operations in six countries in the Middle East and Africa and an extended network across the region.

The BMMI Group is an international provider of holistic end-to-end supply chain solutions, integrated facility management, shipping, logistics and procurement services, with a varying range of clients, from governments to organisations. The Group represents a dynamic portfolio of global household brands and is a leader in the wholesale, distribution, retail and production of food and beverages.

BMMI's world-class integrated logistics and supply chain capability, its robust and professional support infrastructure, and its global standards allow it to continue winning the hearts and minds of its customers and clients, every day.

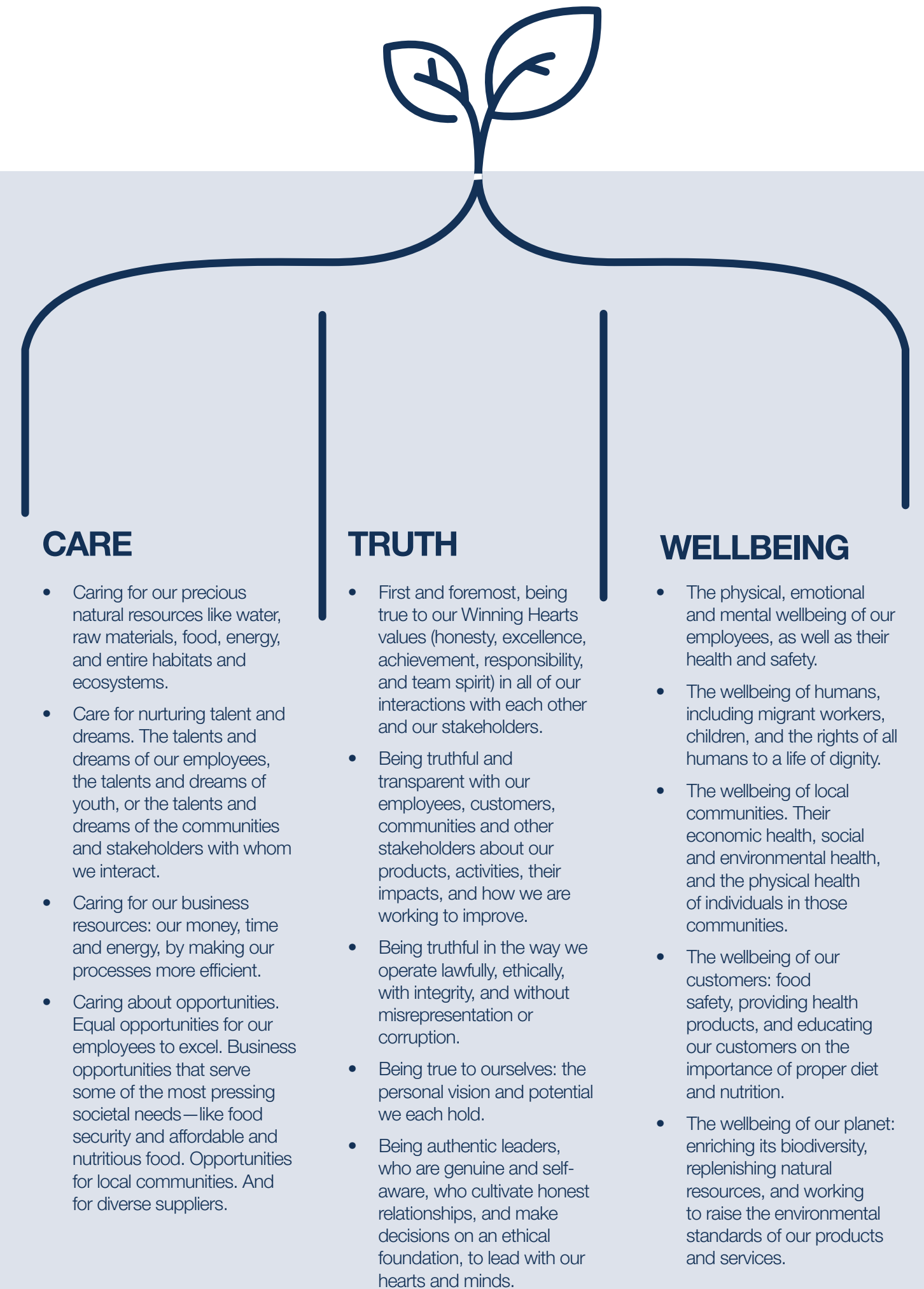


SOCIAL RESPONSIBILITY

Since 2015, BMMI's CSR initiatives have come together under the CSR policy, Nourishing Life.

The Group's corporate social responsibility activities aim to be strategically aligned with the business to provide all stakeholders with sustainable shared value.

The policy is driven by commitments and consists of three overlapping pillars: Care, Truth and Wellbeing.



MAKING A DIFFERENCE WHEN AND WHERE ITS NEEDED MOST

The BMMI team has always believed in the importance of making a difference, and the outbreak of the COVID-19 pandemic only helped the team further realise the importance of extending a helping hand to those most in need. BMMI believes that organisations have an active role to play in offering support, particularly when times are difficult for the communities in which the Group operates.

During 2020 and 2021, even as businesses around the world were impacted by the COVID-19 pandemic and the restrictions it imposed, BMMI's CSR initiative expanded in both reach and investment in order to help truly make a difference where and when it is needed most.

Below are some of the highlights of initiatives inspired by supporting those affected most by the pandemic, followed by further milestones from across 2020 and 2021.

Some highlights

- Through collaboration with selected local charities, BMMI donated essential household and electronic items to over 350 families across Bahrain to support those most affected by the spread of the COVID-19 pandemic. White goods were distributed to vulnerable families equally across the Capital, Northern, Southern and Muharraq governorates.
- BMMI partnered with The Royal College of Surgeons in Ireland – Medical University of Bahrain to sponsor Bahraini nursing undergraduate students with full scholarships. The initiative comes in line with BMMI's efforts to nurture the local workforce, as well as recognise the significant role of nurses as healthcare practitioners at the forefront of patient care.
- BMMI Group endorsed the national campaign 'Feena Khair' with BD100,000. The nation-wide COVID-19 relief initiative was

headed by His Majesty the King's Humanitarian Works and Youth Affairs representative, National Security Advisor and Royal Humanitarian Foundation (RHF) Board of Trustees Chairman, His Highness Shaikh Nasser bin Hamad Al Khalifa.

- BMMI collaborated in an initiative by the Rotary Clubs in Bahrain to provide new laptops to help over 120 students in need continue their learning effectively as schooling took place from home in response to the outbreak and spread of the COVID-19 pandemic.
- To ensure the children at Confident Children out of Conflict in South Sudan do not experience disruption to their learning, the NGO utilised funds from BMMI to hire three teachers for three months for three subjects: Maths, English and General Science, as the COVID-19 pandemic forced schools to shut down.
- BMMI donated 5 million Djiboutian Francs to the Djibouti's Ministry of Budget's special entity dedicated to combating the spread of COVID-19.
- Our Integrated Management System (IMS) team collaborated across the Group to develop and implement

all BMMI COVID-19 protocols and procedures for Bahrain and African operations:

- Developed and assisted in the implementation of business protocols
- Developed, trained, and implemented the Return to Office protocol
- Developed COVID-19 protocols for third party contractors and suppliers
- Dedicated over 1,500 hours to COVID-19 compliance spot checks for all locations
- Conducted over 100 hours of training for COVID-19 precautions and Ministry of Health guidelines for staff
- Weekly COVID-19 statistics reporting
- Fully compliant, with no fines from the authorities for COVID-19 protocol noncompliance

2020 – 2021 MILESTONES

Health and wellbeing

- BMMI donated 55 specialised hospital beds to the Kingdom of Bahrain's Ministry of Health to help meet an urgent demand in the Salmaniya Medical Complex.
- BMMI donated artificial pancreas insulin pumps and related spare parts to benefit five children with diabetes. The modern devices act as artificial pancreases that secrete insulin needed by the body automatically.
- BMMI supported Bahrain's Ministry of Labour and Social Development's 'Takaful Initiative 2' by donating 28 specialised wheelchairs that were customised to meet the specific requirements of each individual recipient.
- BMMI launched its Happy Hearts corporate wellness programme that aims to support a holistic approach to wellbeing for all employees, with a focus on three pillars: physical activity, diet and nutrition, and mental health.
- To mark World Mental Health Day on October 10, BMMI organised a mental health experience to help employees gain awareness and leave the session more relaxed and refreshed. The event featured an introduction to mental health from experts in the field, as well as four experience rooms where people took turns trying various activities and guided exercises. The event marked the first initiative of what will be a focus on mental health as part of our corporate wellness programme in the year 2022.
- As part of BMMI Djibouti's commitment to employee wellbeing, team members who need prescription eyeglasses were offered free check-ups and glasses to ensure their

safety while working in the warehouse and as drivers. The initiative, which first launched in 2016, aims to help employees suffering from impaired vision to perform their jobs safely and more efficiently.



KINGDOM OF BAHRAIN

Ministry of Health



Education, training, and opportunities

- Fifteen students were selected as the first recipients of BMMI's Alosra Scholarship Programme. The Group launched the programme to financially support Bahraini students planning to pursue their higher education at the University of Bahrain and Bahrain Polytechnic. Through its partnership with INJAZ Bahrain, BMMI has committed to support a number of eligible students each year over the course of five years. The scholarships will cover costs for the duration of recipients' programmes up to graduation, as well as materials necessary to complete their degrees.
- BMMI donated BD 200,000 towards the build-up of the Alia Youth House. Alia for Early Intervention is building and operating a Residential Care Facility for developmentally delayed adults. This facility will be available for individuals over the age of 16 and will serve the needs of thirty residents who are moderately developmentally delayed and require habit training.
- BMMI donated a brick making machine to Confident Children out of Conflict (CCC)'s orphanage, as well as funded the education of over 20 children, as part of the Group's commitment to continue sustainable support of the South Sudan NGO.
- Alosra supermarket launched 'Mahali', a local Entrepreneurship Support Programme, as the latest addition to the supermarket's 'Think Local' initiative. Alosra took its support of all things local a step further by joining forces with rising Bahraini entrepreneurs who are looking for support and a helping hand. 'Mahali' aims to nurture small businesses and support them towards getting their products to the public on shelves in Alosra.



Environment and waste reduction

- Alosra supermarket launched its Green Week, in collaboration with the Ministry of Works, Municipality Affairs and Urban Planning, and the Supreme Council for Environment. The event introduced several initiatives in line with the supermarket's commitment to continuously decrease its environmental impact and raise community awareness about the importance of striving towards a zero-waste lifestyle.
- Alosra supermarket participated in the Bahrain Environment Awareness Week that was organised by Bahrain's Supreme Council for Environment. As part of the initiative, Alosra distributed 2,000 of their re-usable eco-bags and discussed the steps they have taken toward a lower environmental impact.
- The BMMI Group was announced as a platinum partner that contributed over 50% of Conserving Bounties' distributed meals since the NGO's inception. Conserving Bounties specialises in collecting and packaging surplus, safe for consumption food from businesses and private occasions to redistribute to those in need across Bahrain. The initiative aims to combat food waste, promote food conservation and social responsibility, which is in line with BMMI's CSR goals.



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 1,322 people who are highly diversified by location, nationality, gender, and age. They are located across six countries: Bahrain, Saudi Arabia, Iraq, Djibouti, Sudan, and South Sudan. The highest concentration of staff is in Bahrain at 59% followed by Sudan with 31%. However, total employees located outside Bahrain in the Middle East and Africa exceeds 500 people, which represents more than 40% of the Group’s headcount.

BMMI has never obstructed employees’ rights to exercise freedom of association and collective bargaining. There have been zero incidents of child labour, or forced labour in 2020-2021.

Employees represent around 32 different nationalities, which makes BMMI a truly global community. Bahrain operations have the highest concentration of female employees at 167 females. Women make up 16 percent of all staff across the Group.



Our diversity matrix

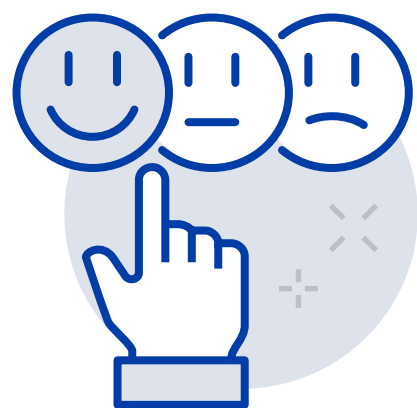
| Country | Jan 2022 | Head Count | Male | Female | Aged between 18 and 38 | Aged between 39 and 48 | Aged between 49 and 78 |
|--------------|----------|------------|-------------|-------------|------------------------|------------------------|------------------------|
| Bahrain | 778 | 58.9% | 611 (78.5%) | 167 (21.5%) | 489 (62.9%) | 216 (27.8%) | 73 (9.3%) |
| Saudi Arabia | 71 | 5.4% | 59 (83.1%) | 12 (16.9%) | 52 (73.3%) | 15 (21.1%) | 4 (5.6%) |
| Iraq | 6 | 0.5% | 6 (100%) | 0 (0%) | 2 (33.3%) | 4 (66.7%) | 0 (0%) |
| Djibouti | 52 | 3.9% | 40 (77%) | 12 (23%) | 32 (61.5%) | 14 (27%) | 6 (11.5%) |
| Sudan | 411 | 31% | 391 (95.1%) | 20 (4.9%) | 223 (54.3%) | 118 (28.7%) | 70 (17%) |
| South Sudan | 4 | 0.3% | 3 (75%) | 1 (25%) | 1 (25%) | 2 (50%) | 1 (25%) |
| Total | 1322 | 100% | 1110 (84%) | 212 (16%) | 799 (60.4%) | 369 (28%) | 154 (11.6%) |

BMMI benefits from a distinctly ‘youthful’ work force. Over 60 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 28 percent aged between 39 and 48; while almost 12 percent are so-called ‘baby boomers’ (Generation BB) who are between 48 and 78 years’ old.

EMPLOYEE SENTIMENTS

In 2020, the Employee Engagement Survey expanded its questions in response to the COVID-19 pandemic in order to gauge sentiment about working from home, which a large portion of our team was doing, when and where possible, in order to safeguard their wellbeing.

Below, is a summary of some of the survey results highlights.



Responses

664 responses

Location:

54% Bahrain
44% African operations
2% Saudi Arabia
1% Iraq

Age range:

62.56% 25 to 39
34.06% 40 to 59
2.87% 24 under
2.87% 60-79

Management and team dynamics

77%

feel their team is collaborative and helps them achieve their goals

75%

feel comfortable communication difficulties with their manager

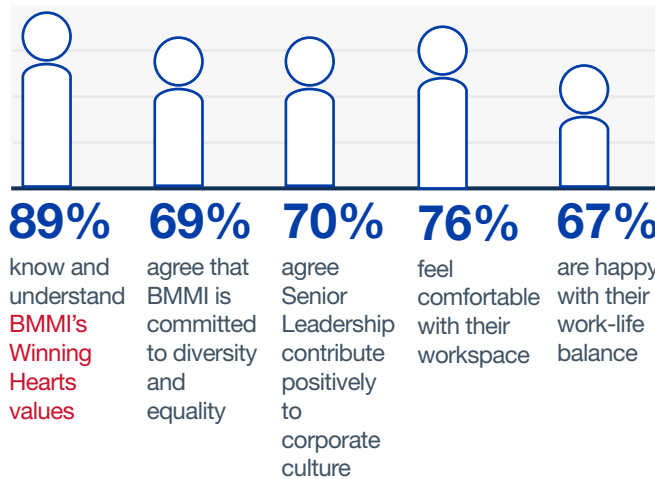
73%

agree they receive regular performance feedback

69%

feel their manager allows them to contribute to their development

Culture and experience



Purpose and performance

76%

agree their job gives them a sense of purpose

81%

feel their goals are made clear to them

83%

feel motivated to achieve their responsibilities

63%

agree their efforts are recognised when they perform well

Working from Home

87%

feel connected to their team when they are working from home

87%

agree they are informed about the organisation's goals and priorities

80%

feel they are equally productive compared to working from the office

78%

feel they are supported by their manager and receive feedback constantly

74%

agree they have a healthy work and life balance when working from home

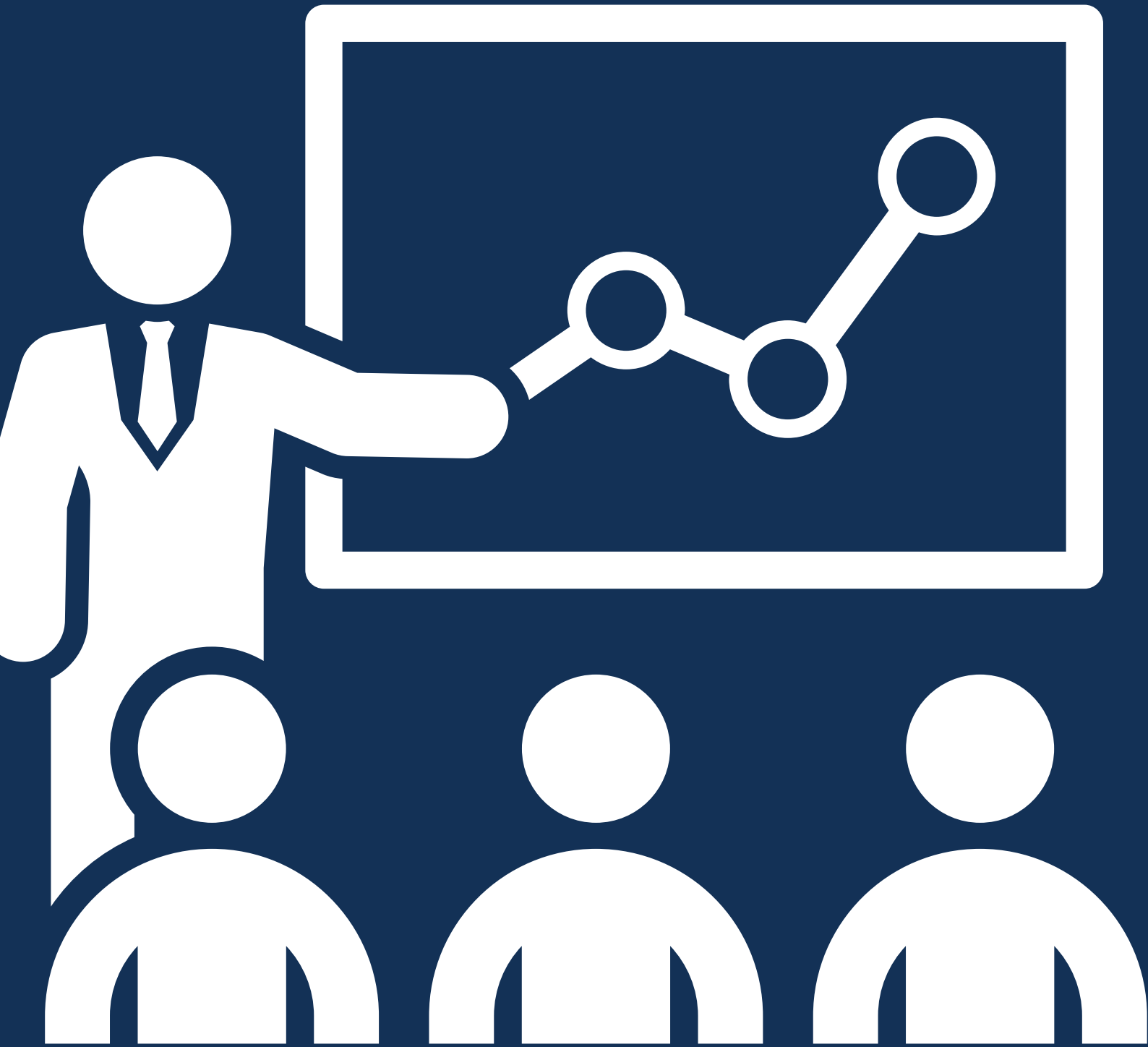


TRAINING MATTERS

The development of our people remains a top priority at BMMI. Our team is encouraged and supported to obtain relevant training and professional qualifications.

Training courses and events were challenging during the restrictions imposed by the COVID-19 precaution measures over 2020 and 2021, however the team strived to continue to adapt as much as possible to the circumstances.

| | 2020 / 2021 |
|--|-------------|
| Total training hours | 6,393 |
| Total number of employees undergone training | 1,449 |



LABOUR

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. Alosra supermarket has long championed supporting local producers in Bahrain, empowering them to be more engaged and active in their communities under the 'Think Local' initiative. This initiative kicked off in 2011 and, at present, almost 15% of Alosra's produce supply is now grown locally, ensuring a mutually beneficial partnership between the store and local producers.

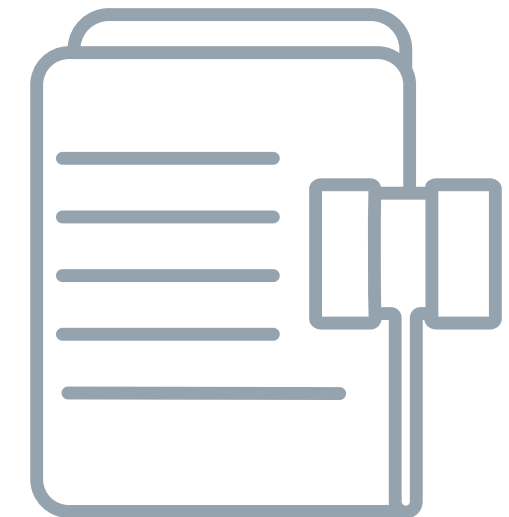
From initially related to sourcing fresh and local produce in Bahrain, 'Think Local' has rapidly gained stature as an integral part of the Group's regional and global aspirations. Ultimately, it is about creating wellbeing for local communities, but also relating to the zero waste of local talent, truth, and improving transparency.

Alosra took this a step further in 2021 by joining forces with budding local entrepreneurs looking for the support and a helping hand through the Alosra's Think Local Entrepreneurship Support Programme. The initiative is called 'Mahali' which means 'local' or 'my place' in Arabic.

The aim is to and nurture small businesses and support them through their journey in order to be ready to get their products to the public on our shelves in Alosra.

Grievances

There have been zero human rights grievances during 2020 and 2021 and direct employees can report such violations confidentially through our employee relations team via phone, email, fax, or postal mail.



ENVIRONMENT

PRINCIPLE 7: Businesses should support a precautionary approach to environmental challenges.

PRINCIPLE 8: Undertake initiatives to promote greater environmental responsibility; and

PRINCIPLE 9: Encourage the development and diffusion of environmentally friendly technologies.

BMMI is an 14001:2015 (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 Riffa Views
- Alosra Saar
- Alosra Janabiya
- Alosra Safa
- Alosra Dhahran
- The Food Processing Unit (FPU)
- BMMI Shop
- BMMI Sitra HQ
- BMMI Hidd

Audits and training

IMS related training is conducted on a regular basis in the areas of Quality, Food Safety, Health & Safety, and Business Continuity, as well as the Environment. Over 1000 IMS training sessions were conducted in 2020 and 2021 across the Group.

Additionally, in 2020 and 2021, BMMI completed sixteen external audits during the year without any minor or major non-conformities:

- LIU3 BMMI Djibouti ISO 22000:2005 Surveillance 1 Audit
- ISO 23000 BCMS for BMMI Bahrain, Alosra and BMMI Djibouti - Recertification Audit
- BMMI Djibouti Warehouse Recertification ISO 9001 and ISO 45001
- BMMI Djibouti Warehouse Recertification ISO 22000:2018
- US VETS Sanitization Audit for Food Production Unit
- BMMI Djibouti GDP Surveillance 2 Audit
- BMMI Bahrain Recertification ISO 9001, ISO 45001, and ISO 14001
- BMMI Bahrain Recertification ISO 22000:2018
- ISO 23000 Surveillance 1 Audit for BMMI Bahrain, Alosra and BMMI Djibouti
- US VETCOM Audit for BMMI Djibouti
- US VET Sanitation Audit BMMI Bahrain (Sitra)
- LIU3 BMMI Djibouti ISO 22000:2018 Transition & Surveillance 2 Audit
- US VETS Sanitisation Audit Food Production Unit
- BMMI Djibouti GDP Recertification Audit

- BMMI Djibouti Warehouse Surveillance 1 IMS for ISO 9001 and ISO 45001
- BMMI Djibouti Warehouse Surveillance 1 for ISO 22000:2018



ENERGY & WASTE MANAGEMENT

The BMMI Group is continuing the process of phasing out the use of R22 refrigerant since 2015, in line with the guidelines of the Montreal Protocol.

The plan set several milestones towards reaching 100% phasing out of R22 by 2040, as follows:

10% reduction by 2015, 35% reduction by 2020, 67.5% reduction by 2025, 97.5% reduction by 2030 and 100% reduction by 2040.

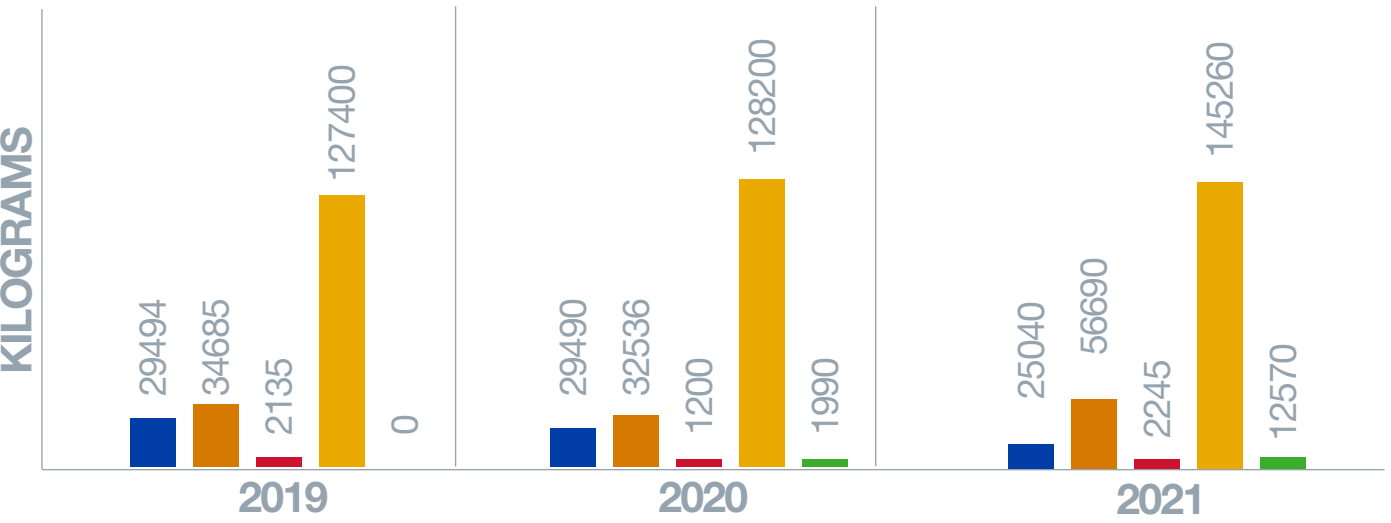
As of December 2021, the BMMI Group had already been able to reduce the usage of R22 by 40.4%, and the team is optimistic that they will achieve 100% reduction even before the deadline of the year 2040.

40.4
%



Our IMS department also continues to encourage the recycling and awareness, of set targets and measures the volume of waste (papers, plastics, and cardboards) diverted from landfill through recycling and recovery as outlined below:

Cardboards, Papers and Plastics waste recycled



Total KG waste collected between Jan-Dec’ 2021 is 241805 KG compared to 186866 KG collected in 2020 and 193714 KG in 2019. 24.8% increase compared to 2019, and 29.4% increase compared to 2020.

BD 10661 received in exchange for the recycled items since Jan’ to December 2021 compared to BD 3638 in 2020.

193% improvement compared to 2020.

IMS monitoring & reporting – CO2 emissions

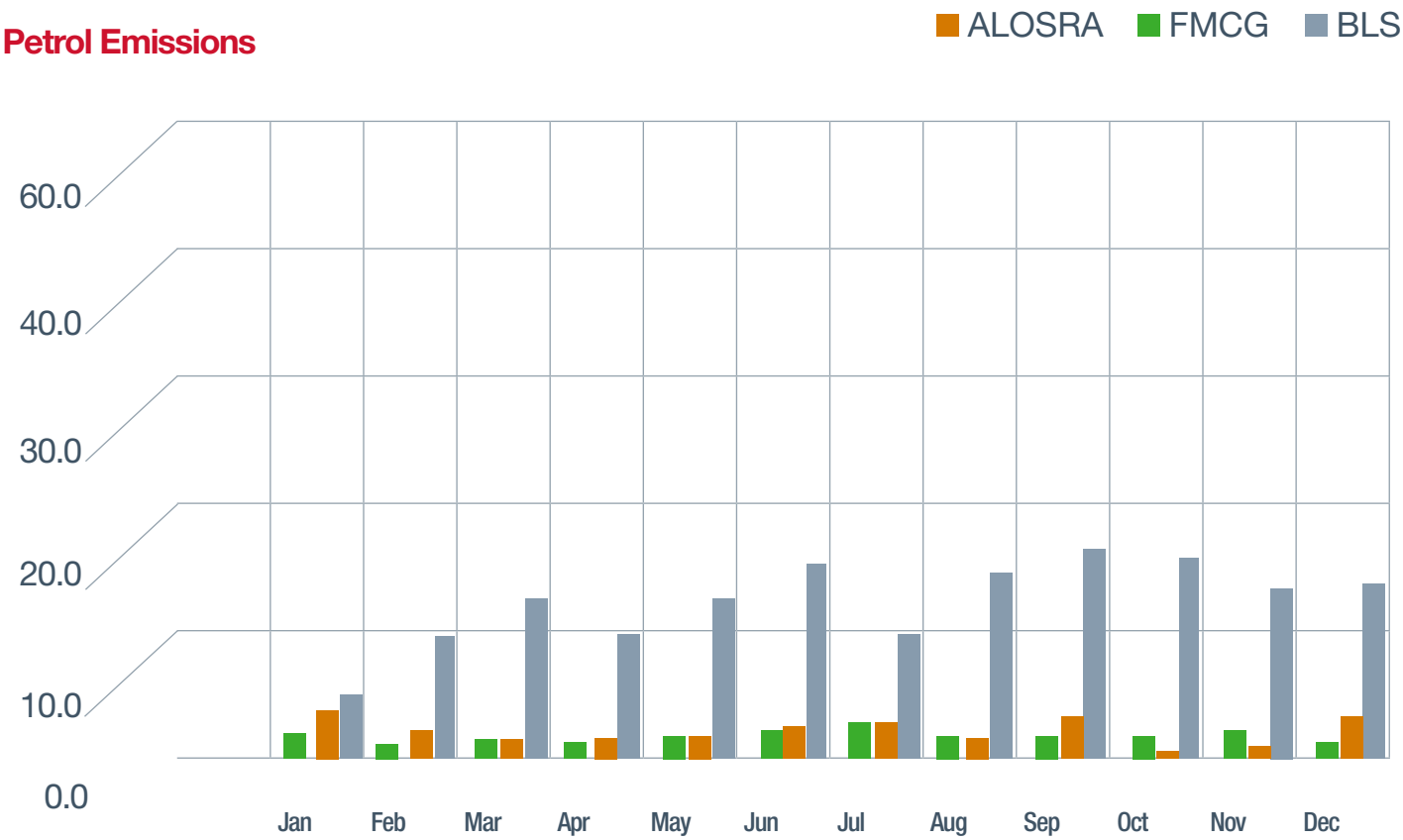
| Co2 Emissions - KG Co2 of Petrol consumption | | |
|--|------------|------------|
| CO2 Emissions | Total 2020 | Total 2021 |
| Alosra | 97.4 | 25.4 |
| FMCG | 18.8 | 22.2 |
| BLS | 80.6 | 146 |
| Total | 196.8 | 193.6 |

| Co2 Emissions - KG Co2 of Diesel consumption | | |
|--|------------|------------|
| CO2 Emissions | Total 2020 | Total 2021 |
| Alosra | 0 | 0 |
| FMCG | 131.5 | 116.4 |
| BLS | 497.1 | 492.9 |
| Total | 628.6 | 609.3 |

The target reduction baseline of 8% in 2021 for both petrol and diesel were not achieved due to the nature of our work and a constant increase in operations and market reach. However, even with the challenges of expanding operations and increased fleet size, almost 5% reduction in emissions of CO2 was achieved

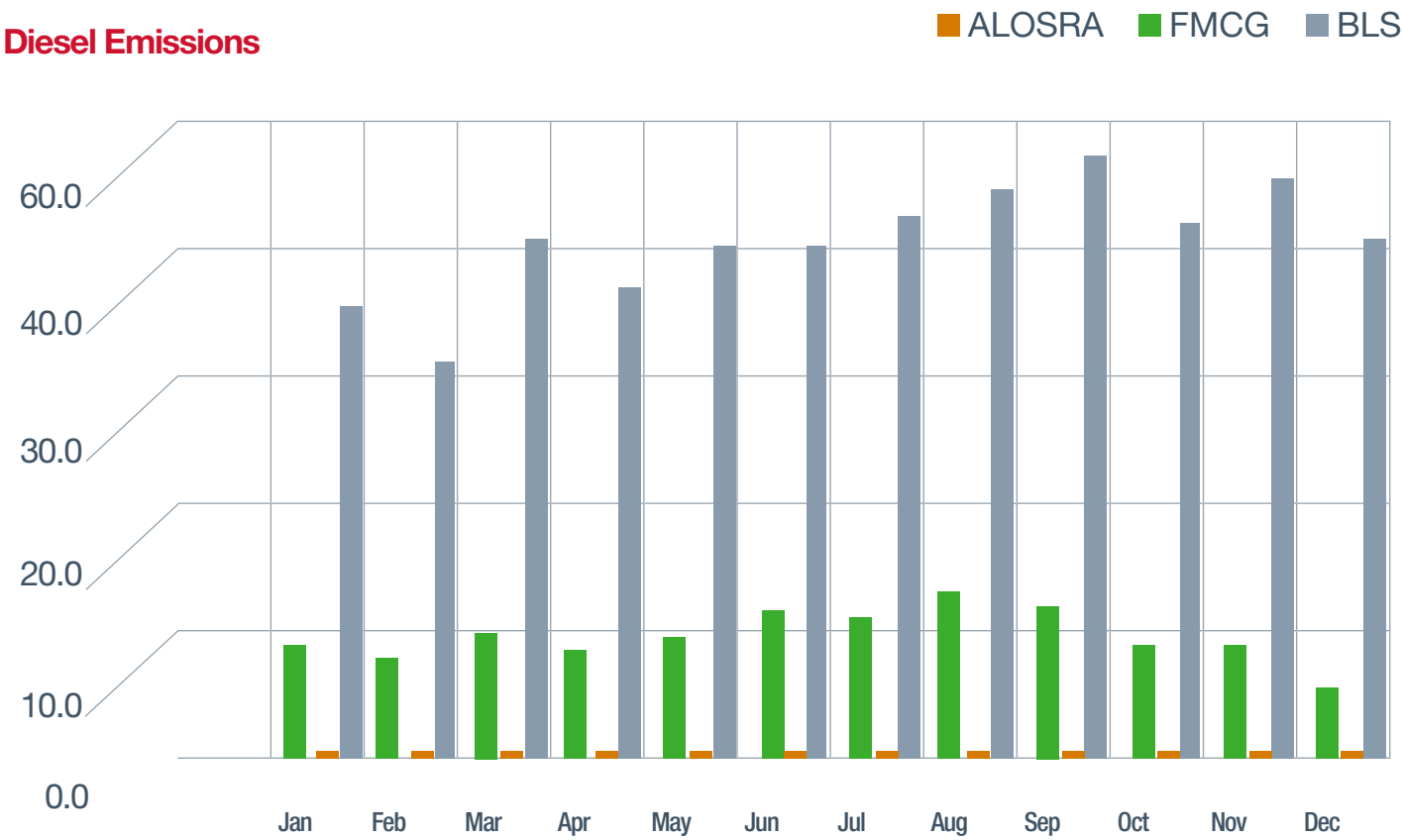
- in 2021 compared to 2020 for both petrol and diesel fuels as follows:
- 1.7% reduction of Co2 emissions from petrol fuel consumption
 - 3.2% reduction of Co2 emissions from diesel fuel consumption

Petrol Emissions



| CO2 Emissions | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
|---------------|------|-----|------|-----|------|------|-----|------|------|------|------|------|
| FMCG | 2.0 | 1.2 | 1.5 | 1.3 | 1.9 | 2.2 | 2.9 | 1.8 | 1.8 | 1.8 | 2.2 | 1.3 |
| Alosra | 3.8 | 2.3 | 1.8 | 1.2 | 1.3 | 2.4 | 2.8 | 1.7 | 3.3 | 0.5 | 1.0 | 3.3 |
| BLS | 10.5 | 9.5 | 11.5 | 9.7 | 11.5 | 14.4 | 9.8 | 13.6 | 15.5 | 14.6 | 12.4 | 12.9 |

Diesel Emissions



| CO2 Emissions | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
|---------------|------|------|------|------|------|------|------|------|------|------|------|------|
| FMCG | 9.1 | 8.0 | 9.9 | 8.3 | 9.7 | 11.9 | 11.2 | 12.3 | 10.5 | 9.5 | 9.5 | 6.7 |
| Alosra | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| BLS | 36.0 | 30.8 | 41.5 | 37.6 | 40.2 | 40.2 | 43.2 | 45.3 | 48.0 | 42.5 | 46.3 | 41.3 |

ANTI CORRUPTION

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

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.

We have set proper standards of accounting for all financial transactions, including the payment of gratuities, fees, commissions and maintaining proper record keeping.

Our internal controls ensure that all the above transactions are handled properly and are fully recorded in a transparent manner.

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 was 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.



There has been no bribery or corruption cases reported during 2020 or 2021. Additionally, there have not been any new channels introduced including internal and external mechanisms in 2020 or 2021 for seeking advice on ethical and lawful behaviour, and matters related to organisational integrity.

Our employees can seek the advice of our Legal team or whistle-blow anonymously by submitting any complaints or concerns through our auditors. In addition, all employees are encouraged to voice concerns through the HR team and top management as we have always operated with an open-door policy.

The Legal team has not received any direct concerns about unethical or unlawful behaviour, and matters related to organisational integrity. There have not been any political contributions in 2020 or 2021.

Mandatory courses

In 2021, two mandatory online courses were introduced for all employees who have a BMMI (or subsidiary) email address and who utilise computers or laptops for company use.

The two courses, Anti-Money Laundering (AML) and Cybersecurity, which were offered by KPMG, became a requirement for employees to complete with a minimum passing grade of 70%.

The comprehensive AML courses covered a range of sub-topics including stages of money laundering, terrorist financing and case studies.



BMMI Head Office

812 Shaikh Jaber Al Ahmed
Al Subah Highway
P.O. Box 828, Sitra
Kingdom of Bahrain
Tel: +973 17 739 444
Fax: +973 17 731 186
enquiries@bmmi.com.bh

Djibouti Office

BMMI Djibouti
PO Box 795 Warehouse No.1 Djibouti
Free Zone Republic of Djibouti
Tel: +253 21 320 600
Fax: +253 21 356 144

GSS Iraq

Basrah, adjacent to Umm Qasr Port
Tel: +964 774 040 8740 / +964 771
311 1000 / +973 3343 3961
Email: kibrahim@bmmi.com.bh /
inquiries@oasis-res.com

GSS Sudan

House No. 2, Block No. 24
Abdulla El Taif Street El Taif Area
PO Box 12947 Khartoum Sudan
Tel: +249 183 231976
Fax: + 249 183 222808
gss@bmmi.com.bh

GSS South Sudan

United Nations
South Sudan Compound
Tel: +211 9543 46378
gss@bmmi.com.bh