

Compliance Policy
Masader Al-Jazeera Trading Co.
2024

Email: info@masader-j.com

Website: <https://masader-j.com>

Tel: +9668001240474

Al-Shefa, Riyadh, Kingdom of Saudi Arabia



Index

<i>Introduction</i>	3
<i>Scope of application</i>	3
<i>Purpose</i>	3
<i>Compliance Policy Objectives</i>	3
<i>Compliance Management</i>	4
<i>Criteria to be adhered to</i>	4
<i>Compliance Officer Duties</i>	4
<i>Rules to be adhered to</i>	5
<i>Policy changes, reviews, and updates</i>	6

Introduction

Masader Al-Jazeera Trading Co. is committed to full compliance with applicable laws, rules and regulations regarding the conduct of its business activities.

Scope of application

This policy applies to all employees of the company in relation to the company's transactions and activities.

Purpose

The purpose of this policy is to ensure compliance with the laws, regulations, internal policies, standards and procedures of the company's activities by its employees and third parties working with the company.

Compliance Policy Objectives

This policy has been developed to provide an overview to our approach to compliance with more details about our compliance principles and expectations; the company's management is committed to following:

- Addressing business ethics in our other relevant policies, including our Code of Conduct and Business Integrity Statement.
- Applying laws and compliance regulations to all employees and operations.
- Fully complying with applicable laws and regulations, including but not limited to the relevant areas of anti-bribery, anti-corruption, conflict of interest, insider trading, competition, environmental protection, discrimination, employment, occupational safety and health, data privacy and intellectual property rights
- Adopting a zero-tolerance approach to behavior that may involve breaches of legislation, especially those that expose our business to criminal risks.
- Enhancing the company's compliance culture by maintaining a proper system of internal control, regular training and clear communications.
- Enforcing a reporting policy and support procedures that encourage our employees to raise concerns about any suspected misconduct or malpractice.
- Conducting a compliance risk analysis on a regular basis.
- Formulating action plans if applicable.
- Evaluating compliance on a regular basis to ensure that the relevant obligations are appropriate and valid.
- Reviewing and updating this policy from time to time and publishing it to employees and stakeholders

Compliance Management

Compliance management is established to ensure the Company's compliance with the laws and regulations governing its activity. Accordingly, the Compliance Officer is responsible for the implementation of the laws, regulations and decisions binding the Company, including all matters issued by the Ministry of Commerce and the concerned authorities responsible for the activity, and must inform the senior management of any violations that affect the company's activity or its organizational position.

Criteria that must be adhered to

1. Integrity

Acting at all times in accordance with the standards of integrity in supervised duties

2. Skills, Care and Diligence

Acting with the necessary skill, care and diligence in the exercise of supervised duties

3. Standards of Professional Conduct

Adherence to standards of professional conduct when exercising supervised duties

4. Dealing Transparently with Regulatory Authorities

Dealing with the regulatory authority in a transparent and cooperative manner and immediately informing senior management of anything related to the company about which the regulatory authority expects notification.

Compliance Officer Duties

- Identifying, assessing and monitoring the non-compliance risks to which the company is exposed and reporting them to the company's board of directors so that the report shows the measurement methods that are followed to measure non-compliance risks, the nature of non-compliance risks, their causes and methods of addressing them, in addition to their impact on the work flow.
- Determining the rules that the company must apply and clarifying these rules to the management and employees of the company.

- Monitoring the company's application of compliance requirements, submitting the related reports, and adherence to laws, regulations and instructions issued by senior management and official authorities.
- Submitting a periodic report on the level of compliance in the company and any violations of compliance requirements to the Board of Directors.
- Enhancing employee awareness and training in compliance aspects.
- Following up on compliance with the laws and procedures of the company's activity and its requirements.
- Participating in the preparation of the company's compliance monitoring policy and ensuring that all employees of the company are bound by this policy.
- Keeping track of all laws, instructions and procedures governing the company's business and any changes to them and informing all levels of management of them, whether issued by the company's management or any other regulatory and legislative bodies.
- Identifying the expected risks of the activity that the company is engaged in, whether existing or new, and any modifications made to the existing activities.
- Participating in the company's various committees if required, specifically those related to the development of the company's procedures and activities.
- Reports and Records.

The Compliance Officer shall submit an annual report to the Board of Directors, provided that the report shall include the following:

- The effectiveness of internal controls.
- Violations that were recorded during the year and what actions were taken to address them.

Rules that must be adhered to

- Relevant regulations related to the company's activity (Companies Law, Labor Law, Governance and Environmental Regulations, etc.).
- Internal policies for each department of the company.

Policy changes, reviews, and updates

This policy must be annually reviewed unless the owner considers an early review necessary to ensure the continuation of the current policy. The only person allowed to make changes to this policy is the Information Security Officer and these changes must be approved by the Department concerned. The change history must also remain up-to-date so that it is updated as soon as any change is made.

Allah is the Arbiter of Success

Preparation and update

Document Type	Policy
Reference Number	C-01
Version No.	1
Issue Date	27/01/2024
Review No.	0
Review Date	

Name	Mr. Wael Al-Yousifi	Mr. Mohamed Hamza	Mr. Ahmed Hassan
Title	Managing Director	Legal Affairs Director	Executive Director
Signature			