Almarai Code of Conduct

Quality and Integrity

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1 June 2022	1.0	Included the Almarai Code of Conduct as Appendix 2 (A&B) and amended the separation wording under the Investigation and Disciplinary Procedure.
30 October 2022	1.1	Amended the gift exception amount and updated provisions relating to compliance with the Code, responsibilities, and policy violations.
4 January 2023	1.2	General updates to the Code of Conduct and related policy provisions.
3 April 2024	1.3	Amended the Code of Conduct Employee Agreement.
25 December 2024	1.4	Amended the Employee Agreement and updated the Vision section in the English and Arabic versions of the Code.
22 October 2026	2.0	Comprehensive revision of the Code, including the transfer of ownership from Human Resources to Ethics & Compliance; introduction of the CEO Message, Speak Up and Non-Retaliation, Environment, Cybersecurity, and Artificial Intelligence sections; strengthening of Anti-Bribery & Corruption, Conflict of Interest, Privacy, Confidentiality, and enforcement requirements; increase of the gift threshold from SAR 150 to SAR 250; and incorporation into the Code of the SAR 1,000 hospitality threshold established under the ABAC framework.

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Almarai Commitment to Integrity

1- The CEO message

Integrity is the compass that guides Almarai in our daily interactions with our colleagues, partners, and customers alike. Together, through our steadfast commitment to ethical values, we have built a reputation we take great pride in—one firmly rooted in trust, responsibility, and respect.

We have adopted this "Code of Conduct" to serve as a clear reference that empowers us all to make the right decisions in every situation. It reflects the standards and principles that define how we believe work should be conducted at Almarai.

Upholding our culture of integrity, fairness, and respect is a shared responsibility. Therefore, I invite you to embody these values in your daily practices, reflecting our mutual respect and our dedication to fostering a positive and safe work environment for everyone.

What defines us at Almarai is not only the success we achieve, but the way in which we achieve it. By staying true to our values, we will continue to strengthen the trust placed in us, today and into the future.

2- Almarai Vision, Mission and Values

Vision:

To grow our leading position as the trusted choice for food and beverages in the region, delighting consumers with quality nutrition every day.

Mission:

To provide quality and nutritious food & beverages that enrich consumers' lives every day.

Values:

Adaptable: we are agile and flexible in our work, confidently taking bold decisions that benefit our stakeholders.

Sharing: we work together as one, openly collaborating and sharing skills and knowledge to enable our people to be the best.

Passionate: we are proud of the work we do and strive for exceptional results.

Innovative: we are driven to improve our business every day and to maximize the creative potential of our people.

Respect: we earn respect by embracing fairness, trust, and integrity in all our relationships.

Excellence: we are diligent in our work and consistently deliver the best quality in everything we do.

Almarai conducts business with uncompromising integrity and professionalism. As a joint stock company, and part of our responsibility towards our stakeholders, we and all our employees are committed to following the highest standards of ethics, principles, and good practice.

Employees are expected to have an active role by reporting concerns regarding ethical issues or violations of this code of conduct. The code serves as a guide that helps employees to recognize, avoid, and even fix these ethical issues they may face in their daily work.

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This Code is modeled on and incorporates language from international best practices, including recognized standards such as the International Labor Organization Standards (ILO), Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI), and the Ethical Trading Initiative (ETI). These frameworks serve as references for preparing this Code and can be valuable sources of additional information.

3- Scope of Our Code:

This document outlines the ethical principles and standards that guide our behavior as a company and as individuals.

At Almarai, we are committed to conducting our business with integrity, honesty, and respect for all. We believe that adhering to these principles, along with our values, is essential for building a strong and sustainable organization.

This Code applies to all Almarai employees, regardless of their position or location, including:

- Directors, managers, employees, and third parties representing Almarai.
- Subsidiaries, in which Almarai owns more than 50 percent of voting rights, or which Almarai has the right to control.
- Agents, consultants, contracted labor, and others when they are representing, or acting for, or on behalf of Almarai.

This Code is a living document that will be updated as needed to reflect changes in our business or industry. We encourage all employees to review this Code regularly and ask questions if they have any concerns. By following the principles outlined in this Code, we can build a stronger, more successful, and more ethical organization.

When we use **"we," "us,"** and **"our,"** we refer to Almarai as a company. When we use **"you"** and **"your,"** we are talking directly to you, the employee.

All Almarai employees are expected to understand and comply with the guidelines set out in this Code. Failure to comply with these guidelines may result in investigation and the application of disciplinary measures in accordance with applicable policies and procedures.

4- How to Use Our Code:

Our Code cannot provide an answer to every question. When making a decision, or determining the right course of action, ask yourself the following integrity-related questions.

- Is it legal?
- Does it align with our Code of Conduct?
- Does it align with our policies and values?
- How would this decision look to others within Almarai and externally?
- Would I be comfortable if my actions were made public?

- If the answer to all the questions is YES, then go ahead!
- If the answer for any question is NO, then STOP and avoid that course of action.
- If you are still uncertain whether it is the right thing to do or not, ASK your line manager, another manager, seek guidance from the Ethics & Compliance Team or send an email to: Compliance@almarai.com.

5- Our responsibilities as employees:

(a) As an Almarai employee, you are responsible for:

- Read, understand, and comply with Almarai's Code of Conduct.

- Stay informed about and comply with all laws, regulations, and Company policies relevant to your job responsibilities.
- Use your good judgment, knowledge, and experience to identify conduct that may violate applicable law, this Code, or other Company policies.
- Report any concern when you witness or suspect any illegal or unethical conduct or any violation of this Code.
- Seek guidance and do not hesitate to ask any questions when you are in doubt before making decisions.

(b) As an Almarai Manager, you have additional responsibilities to:

- Be a role model for our Code and our values.
- Promote a culture of compliance by supporting the implementation of relevant compliance requirements and participating in periodic compliance reviews.
- Create an environment where employees feel comfortable raising ethical concerns or reporting violations.
- Familiarize yourself with our Code of Conduct to effectively address questions and concerns.
- When approached by an employee with a concern, ensure it is handled confidentially, documented, and addressed with appropriate steps without retaliation.
- And finally, if you are in doubt, just ask! We do not expect our managers to have the answer to every question. So, it is important that you seek advice from senior colleagues or escalate concerns to the Ethics & Compliance Team when the best course of action is not clear.

6- Speak up:

Almarai is committed to fostering a culture of integrity, transparency, and accountability. We encourage you to speak up and report any suspected misconduct, violations of the law, or breaches of our internal policies and procedures.

Reports may be made confidentially and, where permitted by law and supported by the reporting channel used, anonymously. Almarai will handle reports in accordance with applicable legal, confidentiality and data protection requirements.

Why Speak Up?

Open and honest communication is essential for maintaining a safe, ethical, and productive workplace. By speaking up, you can help us:

- Prevent and address misconduct promptly.
- Protect our reputation.
- Uphold the highest standards of corporate governance.

What Can You Report?

We encourage you to report any suspicions of wrongdoing, including but not limited to:

- Unacceptable accounting practices.
- Irregularities or conduct that are in breach of the applicable laws and regulations, as applicable to the Company.
- Fraud.
- Bribery and corruption.
- Deliberate misrepresentation of facts.
- Failure to comply with legal obligations, including contractual terms or record-keeping requirements.
- Abuse of delegated authorities.
- Policy violations.
- Misuse of the Company assets.
- Serious failures of fairness or due process.
- Health and Safety risks.
- Environmental Risks.

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- Data Protection or Confidentiality breaches.
- Harassment or victimization.
- Failure to comply with professional standards.
- Other unethical conduct.

How to Report a Concern?
We offer multiple confidential reporting channels:

- Whistleblower Platform: Access our secure online platform to report anonymously.
- Compliance Email: Submit your report directly to our Compliance email at Compliance@almarai.com.
- Direct Reporting: Speak up to your line manager, any senior manager, or the Ethics and Compliance Team. Reports will be handled confidentially, with information shared only on a strict need-to-know basis and in accordance with applicable legal, investigation, and data protection requirements.
- Grievances: For workplace grievances, please follow the process outlined in the Disciplinary and Grievances Policy and submit your grievance through the SuccessFactors system.

7- Non-Retaliation:

We are fully committed to protecting individuals who, in good faith, raise concerns, seek guidance, report suspected misconduct, or participate in investigations through approved channels. No one shall suffer discrimination, harassment, retaliation, or other adverse employment or reputational consequences as a result of such actions.

Integrity in the Workplace:

1- Environment:

We are committed to conducting our business responsibly and sustainably, which protects the environment and contributes positively to society and future generations. This commitment is reflected in Almarai's sustainability strategy and our long-term focus on climate action, resource efficiency, environmental protection, and responsible operations.
Maintaining this commitment requires that Almarai's employees understand and comply with all applicable environmental laws, regulations, permits, and internal policies. Every employee, contractor, and business partner is expected to act responsibly and proactively to minimize environmental impact and support Almarai's sustainability objectives.

Almarai does not tolerate any actions that cause unnecessary environmental harm, conceal environmental incidents, or violate environmental laws, regulations, or company standards.

What should you do?

- Conduct all activities in a manner that minimizes negative environmental impact and supports Almarai's sustainability goals, while respecting the rights of communities and stakeholders affected by our operations.
- Use natural resources responsibly and efficiently, including energy, water, raw materials, and land, and actively support initiatives that reduce consumption and waste.
- Support climate change mitigation efforts by reducing greenhouse gas emissions, improving energy efficiency, and promoting the use of renewable and low-carbon solutions where applicable.
- Manage waste responsibly by following approved waste segregation, handling, storage, recycling, and disposal practices, and by preventing pollution to air, soil, and water.
- Prevent environmental pollution by ensuring that emissions, discharges, and releases are controlled, monitored, and kept within permitted limits.
- Do not engage in, ignore, or conceal any environmental violations, including actions that may result in environmental damage, regulatory penalties, or harm to Almarai's reputation.

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- Support sustainable agriculture, responsible sourcing, and environmentally sound practices across the value chain, in line with Almarai's sustainability commitments.
- Be aware of the environmental aspects, and risks associated with your work activities, and take appropriate actions to control and reduce them.
- Act responsibly even outside working hours where behavior could negatively affect the environment, Almarai's reputation, or its sustainability commitments.
- Immediately report any environmental incidents, spills, leaks, non-compliance, or potential risks to the environment through the environmental incident module in the system or the Ethics & Compliance Team.

2- Health and Safety:

We conduct all our business activities with due care for health and safety. Maintaining that commitment demands that Almarai and its employees understand and comply with all applicable health and safety laws and regulations.

Almarai does not tolerate violence or retaliation by or against its employees, partners, contractors, and customers.

What should you do?

- Conduct all activities in a manner that protects Almarai employees, customers, sub-contractors and local communities, and that also respects the rights of neighbors to community safety and security.
- Do not enter the company premises or use the Company vehicles under the influence of, or in possession of, any intoxicating substances such as alcohol or other drugs and/or in possession of any weapons, firearms, or explosives.
- Be alert to what is going on around you, observe good security practices and speak up about any threats or potential violence.
- Employees must avoid any misconduct, even off-the-job, that could impair their work performance or negatively affect the company's reputation or business interests.
- Understand safety and health conditions and the associated hazards of your work area.

3- Personal Behavior:

Almarai is committed to the highest standards of ethical business conduct. Thus, it has high expectations for its employees to demonstrate the same standards of honesty, integrity, and respect for co-workers, customers, partners, and any other party with whom an employee conducts business on behalf of the company. Almarai seeks to provide an inclusive, positive, and welcoming workplace for its employees, valuing their talents and contributions to the business.

What should you do?

- Be honest, faithful, and compliant with the company's internal policies, regulations, and ethical standards when conducting your duties and dealing with others on behalf of Almarai.
- Treat your colleagues with mutual respect, share knowledge and experience, and never undermine colleagues directly or indirectly.
- Contribute to the company's mission and vision by understanding Almarai's goals and strategies, proactively supporting them, and exercising the highest level of professional and ethical behavior.
- Adhere to the company's dress code and maintain a professional appearance, including proper personal hygiene, at all times while on duty or representing the company

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- Almarai's reputation is in your hands. Therefore, treat customers, suppliers, and consumers with utmost integrity and ensure your actions always reflect our values.
- Conduct business with integrity and fairness, comply with applicable competition laws, and refrain from engaging in any practices or arrangements that may restrict or distort fair competition.

4- Human Rights, Anti-Discrimination and Harassment:

Almarai's respect for human rights is one of the company's fundamental values. Almarai strives to respect, protect and promote these rights.

Almarai is an equal opportunity employer and bases all employment decisions solely on qualifications, experience, skills, and potentials. Employment decisions are made without regard to race, gender, age, religion, nationality or origin. Almarai is committed to fair employment practices and abides by all applicable employment laws.

Almarai maintains a work environment that is free from discrimination, harassment, and retaliation. Almarai does not tolerate any harassing conduct that may interfere with an individual's work performance or create an intimidating, hostile, or offensive work environment.

What should you do?

- Maintain a work environment that promotes respect for all employees and for the human rights of co-workers, partners, suppliers and customers.
- Do not discriminate against other employees, partners, suppliers, or customers based on, but not limited to, their gender, origin, nationality, religion, race and age.
- Treat others with respect and dignity. Do not engage in human rights abuse or conduct business with those who do.
- Do not engage in harassment of other co-workers, partners, suppliers, or customers. This includes, but is not limited to using abusive language, physical or sexual exploitation, or creating an intimidating, hostile or offensive work environment.
- Employees who allow harassment to continue or fail to take appropriate corrective actions upon becoming aware of it shall be deemed to be a party to the offense, even if they did not engage in the behavior themselves.

5- Cybersecurity

Employees must protect Almarai's digital assets, systems, and information by ensuring that all data whether operational, technical, financial, commercial, or personnel-related is accessed, used, stored, and transmitted only through secure and authorized Almarai systems. Employees must not disclose, copy, store, share, process, or transmit Company information outside approved channels and must not use personal social media platforms, personal email accounts, personal communication applications, personal cloud storage services, or generative AI platforms that have not been approved by Almarai. All digital information must remain within Almarai's controlled environment, and employees are strictly prohibited from creating or retaining unauthorized electronic or written records of company information. Only secure communication applications formally approved by the relevant authorities within Almarai may be used. Employees must immediately return or delete all digital information upon request and must promptly report any actual or suspected cybersecurity incident. Any breach of this cybersecurity section may result in disciplinary action and, where applicable, notification to regulatory bodies.

What Should You Do?

- Use only approved Almarai systems, devices, applications, and communication tools when handling company information.
- Never store, share, or transmit Almarai data using personal email, personal messaging apps, personal cloud storage, or social media.
- Protect passwords, devices, and system access credentials in accordance with IT security requirements.

- Ensure that all company information remains within authorized storage locations and not on personal devices or unapproved platforms.
- Avoid copying, downloading, or creating records of company data unless explicitly required for your job and permitted by security policy.
- Immediately report any suspicious activity, data loss, unauthorized access, or cybersecurity incident to the IT Security Team.
- Return and/or delete all electronic information upon request or when no longer needed for work purposes.
- Follow all Almarai cybersecurity and IT governance policies, procedures, and approved security practices.

Integrity in the Marketplace and Business Dealings:

1- Anti-Bribery & Corruption:

Almarai is committed to preventing bribery and corruption in all its forms. Employees and other individuals acting on behalf of Almarai must comply with the Almarai Anti-Bribery & Corruption Policy and Procedures, which establish the Company's requirements and controls relating to bribery and corruption risks, including gifts and hospitality, facilitation payments, relationships with External Parties, reporting obligations and investigations.
Almarai is committed to conducting business with the highest ethical standards and in full compliance with all applicable anti-bribery and corruption laws and regulations. Bribery and corruption can tarnish an organization's reputation, violate public trust, and lead to severe legal and financial consequences. By incorporating strong anti-bribery and corruption measures into our code of conduct, we ensure that our business practices are transparent, fair, and sustainable. This commitment not only safeguards our company's integrity but also contributes positively to society.
Almarai strictly prohibits bribery and corruption in any form, including facilitation payments, kickbacks, improper gifts, hospitality, charitable donations, sponsorships, employment opportunities, discounts or any other improper advantage intended to influence a decision or obtain an unfair benefit.
Bribery can occur in both the public and private sectors and may involve direct or indirect conduct through third parties. Employees must not offer, promise, give, request, authorize, solicit, receive or accept a bribe or any other improper advantage under any circumstances.

It's important to note that a bribe can take many forms. A gift, a favor, or even an offer of a loan or a job could be considered a bribe if it is offered or accepted with the intention of influencing a decision or obtaining an undue advantage.
What should you do?

- Comply with all applicable anti-bribery and corruption laws and regulations in every jurisdiction where we operate.
- Never directly or indirectly give, offer, promise, authorize, request, receive, or accept any cash payment, cash equivalent, personal loan, gift, hospitality, donation, sponsorship, employment opportunity, discount, rebate, or other benefit for the purpose of influencing a decision or obtaining an improper advantage.
- Do not make or accept facilitation payments or kickbacks, regardless of their value or local custom.
- Never directly or indirectly provide cash, cash equivalents, personal loans, or other financial benefits to a Public Official, regardless of value.
- Any gift, hospitality, or expenditure involving a Public Official must be reviewed by the Ethics & Compliance Team and approved in accordance with applicable Company procedures, regardless of value.
- Exercise caution when giving or receiving gifts, hospitality, charitable donations, sponsorships, or other benefits and ensure compliance with the Almarai Anti-Bribery & Corruption Policy and Procedures.

- Maintain accurate and complete records of all business transactions, including payments and expenses.
- Consult with the Ethics & Compliance Team when unsure about the ethical implications of a particular action or request.
- Promptly report any actual or suspected bribery, corruption, misconduct, or violation of Company policies through the approved reporting channels.

2- Conflict of Interest:

It is of paramount importance that Almarai employees consistently avoid any activities, positions, or business affairs that could, or even appear to, interfere with the diligent execution of their duties and responsibilities owed to Almarai. Similarly, employees must ensure that no external interests compromise their ability to make decisions solely in the best interest of the company. Every decision an employee makes while on the job must be driven by objectivity and a commitment to Almarai's best interest, without exception.

A "conflict of interest" is understood to occur when an employee or a member of their family becomes involved in business activities that hold the potential to influence or clash with the proper and ethical performance of their job responsibilities at Almarai. A conflict of interest is particularly likely to be present when the employee's personal interests could improperly influence their capacity to make sound, fair, and unbiased business decisions on behalf of the company.

What should you do?

- Avoid situations that can lead to an actual or potential conflict of interest by understanding the company's policies.
- Refrain from obtaining any kind of compensation from competitors, suppliers, contractors, and current or prospective customers.
- Any significant business interest acquired through inheritance, gift, investment, or any other means must be promptly disclosed to the Ethics & Compliance Team for assessment and management of any actual, potential, or perceived conflict of interest. (A significant business interest is defined as owning 5% or more of a specific business or having an investment in a specific business that represents 5% or more of your net worth).
- Do not accept roles as directors, officers or advisors in other organizations that may interfere with your job duties and affect your allegiance to the company without prior written approval from the Ethics & Compliance Team.
- Do not directly or indirectly hold 5% or more of the issued share capital in a business enterprise that does business with, seeks to do business with, or competes with Almarai.
- Do not act in business transactions as a broker, finder, or go-between involving the company, with the aim of gaining financial interest.
- Do not be involved in the hiring, supervision, or conducting of business with family members, relatives, or any individual with whom you share a close personal relationship.
- Do not use or misuse Almarai resources without written approval to gain personal interest, or to support non-profit or for- profit corporations.
- Promptly disclose any actual, potential, or perceived conflict of interest to HR, your line manager, or the Ethics & Compliance Team in writing and cooperate with any review, mitigation measures, monitoring requirements or management directions implemented by the Company.
- Keep in mind that it is not possible to list every potential conflict of interest situation. If you are not sure if a situation can constitute a conflict of interest, consult with the Ethics & Compliance Team.
- Avoid lending or borrowing money from colleagues, managers, or subordinate employees. Such transactions may create real or perceived conflicts of interest and compromise professional integrity.

- Ask questions when in doubt and address them to your line manager, human resources, and the Ethics& Compliance Team if you suspect that you may potentially have a conflict-of-interest situation.
- Obtain prior written approval in situations where a potential conflict of interest is deemed unavoidable or can be effectively mitigated through specific measures.

3- Gifts & Hospitality:

Almarai recognizes that offering and accepting proportionate and appropriate business courtesies such as gifts and hospitality can be valuable in building and maintaining strong relationships with our external partners. Gifts may include modest items given for relationship-building purposes, while corporate hospitality refers to business-related entertainment or hosting, such as business meals outside routine office meetings, invitations to sports or cultural events, participation in corporate events or conferences, or hospitality packages that include event tickets, meals, or beverages. However, these courtesies must never be given to improperly influence business decisions. Any benefit provided directly to an individual rather than to a customer organization is treated as a personal gift and must fully comply with this Policy. It is essential that all such practices are conducted ethically and transparently to avoid any perception of undue influence or impropriety.

3.1 Principles Governing Gifts & Hospitality

Any gift or hospitality given or received must always adhere to the following fundamental principles:

- The gesture must not be intended to influence, nor could it be reasonably perceived as influencing any business decision by the recipient.
- Particular caution must be exercised when offering or accepting gifts or hospitality during, immediately before, or shortly after a tender, contract negotiation, renewal, supplier selection, or other significant business decision. In such circumstances, guidance must be sought from the Ethics & Compliance Team before proceeding.
- Any expenditure must be proportionate, genuine, and aimed at fostering legitimate business relationships or marketing Almarai's products. Lavish, extravagant, or excessive gestures are strictly prohibited.
- All gifts and hospitality must be given or received in the name of Almarai, never in your personal capacity.
- All activities must fully comply with applicable laws, anti-corruption regulations, and this Policy.
- Gifts must not include cash or any form of cash equivalent, such as gift vouchers.
- All gifts and hospitality must be provided and received openly, not secretly.

3.2 Approval Thresholds

Prior written approval from the Ethics & Compliance Team is required for any gift or hospitality exceeding the following per-person limits for External Parties:

- Corporate Hospitality (Given or Received): SAR 1,000.
- Gifts (Given or Received): SAR 250.

Any gift or hospitality involving a Public Official, regardless of value, must be reviewed by the Ethics & Compliance Team and approved in accordance with applicable Company procedures.

The request for approval must include the following:

- Date of the proposed hospitality or gift.
- Names of all providers and recipients.

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- Nature of hospitality or gift (e.g., dinner, event, promotional item).
- Purpose of hospitality or gift (e.g., building client relationships).
- The per-person value attributable to each non-Almarai recipient
- Confirmation that the gesture is not intended to improperly influence a business decision.

Gifts and hospitality at or below these thresholds do not require prior approval; however, they must still be reported and recorded in the Company's Gifts & Hospitality Register in accordance with applicable Company procedures.

3.3 Commercial Incentives (Non-Reportable)

Routine commercial incentives provided to customer organizations such as promotional items, trade-marketing rewards, or performance-based vouchers do not require reporting, provided that they form part of an approved commercial or trade program, are directed to the customer company or its consumers (not individual employees) and are properly documented and budgeted by the relevant commercial functions. However, any incentive, voucher, or gift given directly to an individual employee of a customer or supplier is considered a personal gift and must fully comply with this Policy.

What should you do?

- Carefully evaluate the nature and intent behind any gift, gesture, or courtesy before offering or accepting it. Consider whether it could impact your objectivity in business decisions.
- Never use your position at Almarai to solicit business courtesies or personal favors.
- Do not accept gifts, benefits, or free services from business partners (customers, suppliers, etc.) except as explicitly permitted by Almarai's policies and guidelines. This includes, but is not limited to:
  - Goods or services free of charge or at discounts beyond standard or seasonal offers.
  - Sponsored holidays or vacation packages.
  - Cash or cash equivalents.
  - Gifts or entertainment that are illegal, immoral, inappropriate, or offensive.
  - Personal items of high value.
  - Invitations to events that could be perceived as unduly influencing business decisions.
- Always decline any offer that could compromise your ability to make objective decisions or harm Almarai's reputation.
- If you are uncertain whether a particular gift or hospitality requires approval or is appropriate, always seek clarification from the Ethics & Compliance Team (compliance@almarai.com) before proceeding.

4- Privacy

Almarai is committed to protecting the privacy and personal data of our employees, customers, partners, and other stakeholders. We collect, use, and process personal data in accordance with the Saudi Personal Data Protection Law (PDPL) and its implementing regulations.

What should you do?

- Always respect the privacy rights of individuals.
- Only collect personal data that is necessary for legitimate business purposes.
- Ensure that all personal data is collected, used, and processed lawfully and fairly, in compliance with the Saudi PDPL.
- Be transparent about how and why personal data is being processed.
- Protect personal data from unauthorized access, use, disclosure, alteration, or destruction.
- Implement appropriate security measures to safeguard data.
- Keep personal data confidential.
- Do not disclose personal data to unauthorized individuals, either inside or outside Almarai.

- Ensure that personal data is accurate and up to date.
- Take steps to correct or delete inaccurate data.
- Use personal data only for the purposes for which it was collected.
- Do not use personal data for purposes that are incompatible with the purpose for which it was collected unless such processing is permitted under applicable law and approved in accordance with Company requirements.
- Retain data only for as long as necessary to fulfill the purposes for which it was collected, or as required by the Saudi PDPL and Almarai's data retention policies.
- Cooperate with Almarai's Data Privacy Team in responding to requests from individuals who wish to exercise their rights under the Saudi PDPL (e.g., access, correction, deletion).
- If you become aware of any potential privacy breaches or violations of this Code of Conduct or the Saudi PDPL, report them immediately to the appropriate channels (e.g., supervisor, Data Privacy Team at Dataprivacy@almarai.com, or the Ethics & Compliance Team).
- If individuals wish to withdraw their consent, support them promptly and document the process as required.
- Before transferring any personal data outside Saudi Arabia, ensure the transfer meets PDPL requirements, including securing necessary approvals and safeguards.
- When engaging third-party vendors or service providers who may access personal data, verify their compliance with PDPL and Almarai's standards.
- Attend all required data privacy training sessions to stay informed of ongoing legal and company obligations.
- For activities that pose a high risk to personal data, participate in any required Data Protection Impact Assessments (DPIA).
- Maintain accurate records of any personal data processing activities for which you are responsible.

Integrity Towards Shareholders

1- Accuracy of Business and Financial Records.

Clear, complete, and accurate records are the fundamental basis for a successful business. They provide an honest impression of the company's financial health and ensure accountability to shareholders and investors, thereby helping the company accomplish its financial commitments. Therefore, Almarai employees are required to use absolute care and attention to accurately record and report information in all business records and reports. Almarai does not permit or otherwise tolerate the falsification of documents. Employees must report any attempts to falsify records.

What should you do?

- Provide accurate and honest information for business reports and records.
- Follow the necessary processes to ensure that records and books accurately reflect the company's transactions and financial status.
- Do not mislead or misinform others by providing inaccurate information in business records.
- Do not mischaracterize accounts or transactions, falsify or misreport information, or disclose confidential business information.
- Do not create unrecorded or off-the-books accounts or funds.
- Comply with regulations and policies regarding records and make sure that you provide the government or any regulatory authority with full, honest and accurate information.
- Keep records related to your job properly maintained and stored according to the company's policy. Also never dispose of information that may be needed in the future.

Almarai Information Classification: Public

2- Protecting Almarai's Assets.

Almarai's assets are everything the company owns or uses to conduct business. This includes, but is not limited to, the buildings and facilities you work in, the vehicles that transport products and employees, technology, developed ideas and inventions, computers, telephones, and mobile devices. All employees are obligated to care for these assets and be proactive in securing them from loss, damage, theft, waste, and improper use. However, the company is aware that occasional, reasonable personal use of company resources by employees may occur. This use must be reasonable and should not conflict with or negatively affect the interests of Almarai.

What should you do?

- Do not use the company's assets for personal gain, to benefit other organizations, or for anything illegal or unethical.
- Report any property misuse, theft, or damage, or any asset that is in need of repair or replacement.
- Do not sell, lend, or give away anything that belongs to the company.
- Protect patents, copyrights, trademarks, and trade secrets, as these are also valuable company assets.
- Remember, any idea, invention or product developed by you working for the company and using its resources is company property and remains so even after your employment ends.
- Protect the company's system by physically securing your assigned devices, and by being cautious when opening links and external emails.
- Do not install unlicensed software, applications, or hardware on your computer.
- Protect Almarai's confidential information even if your employment with the company ends.
- Protect the information of others. You have a responsibility to protect confidential information about Almarai, but also the confidential information of companies with which Almarai does business.

3- Insider Trading

According to the Saudi Capital Market Authority, Inside Information is defined as any information that relates to a traded security and has not been disclosed to the general public, and that is not otherwise available to the general public; and that a normal person would realize that, in view of the nature and content of the information, disclosing it or making it available to the public would have a material effect on the price or value of the security. Insider Trading is prohibited under Article 50 of the Capital Market Law, issued pursuant to Royal Decree No. M/30 dated 2/6/1424H.
Almarai employees shall comply with the law. Employees must not share or use material non-public information for financial or any other personal benefit and must not trade on inside information or tip off others so that they may trade based on inside information.
Material non-public information may include:

- Non-public information about mergers or acquisitions.
- Sales or earnings information or volume results and financial forecasts.
- Changes to the executive management team.
- Major gains or losses.
- Pending regulatory actions or lawsuits.

What should you do?

- Do not buy or sell or recommend or suggest that anyone else trade securities (such as stocks, bonds or derivatives) of Almarai or any other company, either directly or through family members, while you are aware of inside information that could make the price of those securities go up or down.
- Avoid sharing material inside information with anyone outside Almarai except only if strictly necessary for your day-to-day job and to the extent this complies with the confidentiality obligation set out in the code of conduct and any other applicable policy or regulation.
- Refrain from discussing Almarai business in social circles and among family members and friends.
- When you are not sure whether the information is "inside information" consult the Ethics & Compliance Team.

4- Confidentiality

Almarai employees must not disclose non-public information, which is information the Company has not disclosed or made generally available to the public and is considered to be confidential. Protecting such information helps Almarai maintain its high ethical standards and preserve the company's reputation as the industry leader.
Confidential information including business strategies, structure, financial situation, performance, contracts, pricing information, marketing plans, technical specifications, employees' information, drawings, reports, process improvements and computer software are all company property. All such information remains the exclusive property of Almarai. Furthermore, inventions and products developed by employees during their employment using Almarai resources or facilities are considered company property and remain so even after an employee leaves the company.

Confidential information must not be stored, shared, or transmitted using personal devices, personal cloud storage, personal email, or personal communication applications under any circumstances, unless expressly and formally authorized by Almarai.

Protection over non-public information may extend to information about a company's customers, suppliers, other business partners, or consumers that employees have access to as part of their job. This information can be written, oral, or electronic. Almarai's confidential information may not be disclosed to third parties without authorization and only on a strict need-to-know basis.

The obligation to protect confidential and non-public information continues during and after the end of employment with Almarai.

What should you do?

- Protect non-public information that you have access to due to your work duties and exposure to the company's activities, relations, and resources.
- Your obligation to preserve confidential information continues even after your employment with Almarai ends.
- Never use confidential information to gain personal advantage or interest.
- Take the necessary steps to protect the company's confidential information while dealing with third parties, such as by asking them to sign Confidentiality & Non-Disclosure Agreements (NDAs).
- Be cautious when discussing your work details with others, whether a co-worker, a friend, or a family member. Also, do not share such information by talking in public places or on social media platforms, as this may put the company's security at risk.
- Return or delete all confidential information when requested or when it is no longer needed for your role.
- When in doubt about sharing information, follow the rules and consult your line manager and the Ethics & Compliance Team.

Artificial Intelligence Use

The provisions of this section should be read in conjunction with the Company's approved Cybersecurity, Data Protection, and Technology policies and procedures. As Almarai embraces the integration of Artificial Intelligence (AI) Solutions (Technologies and Tools), it is crucial that all employees understand the ethical implications and responsibilities associated with AI use, as well as the acceptable practices and potential violations related to AI.

1- Ethical Use of AI

Employees must ensure that AI Solutions are used ethically and responsibly. This includes:

- Avoiding the manipulation of AI-generated information to mislead stakeholders.
- Ensuring that AI applications do not perpetuate bias or discrimination against individuals or groups.
- Maintaining transparency in AI-driven decision-making processes.

- Inform individuals when AI is used in ways that affect them and, where required, obtain their explicit consent for data processing.
- Ensure that any vendors or service providers involved in AI development or operations adhere to the same data privacy and ethical standards.
- Promptly report any suspected misuse of AI or data breaches through established channels and cooperate with investigations and remediation efforts.
- Only approved AI platforms are to be used for all organizational activities involving artificial intelligence.
- An inventory of all AI platforms in use shall be maintained and kept up to date to ensure compliance and oversight.

2- Data Privacy, Protection, and Security

The use of AI often involves handling sensitive data. Employees are required to:

- Comply with all applicable data protection laws and Almarai's privacy policies.
- Safeguard personal data collected through AI Solutions and avoid unauthorized access or sharing.
- Never input Almarai confidential information – including but not limited to trade secrets, Personally Identifiable Information (PII), or unreleased financial data – into public or third-party AI solutions
- Follow data classification, handling, and retention requirements
- Use only organization-approved AI solutions

3- Accountability and Oversight

While AI can enhance efficiency, employees must:

- Retain accountability for decisions made with AI assistance.
- Ensure that human oversight is integrated into AI applications to mitigate risks and errors.

4- Reporting AI-Related Violations

Employees are encouraged to report any suspected violations related to AI use, including unethical practices or data privacy breaches. Reports can be made through the following channels:

- Immediately report any suspected security incident, data breach, or system compromise (especially those involving AI systems or data collected by them) to the Cybersecurity Team for urgent technical intervention.
- Whistleblower Platform: Access our secure online platform to report anonymously.
- Compliance Email: Submit your report directly to our Ethics & Compliance Team email at Compliance@almarai.com.
- Direct Reporting: Speak to your line manager or the Ethics & Compliance Team.

Violations of the Code

At Almarai, adherence to our Code of Conduct is essential for maintaining a culture of integrity and ethical behavior. Violations of this Code can lead to serious consequences, including disciplinary action, up to and including termination of employment.

1- Definition of Violations

Violations of the Code may include, but are not limited to:

- Engaging in dishonest or fraudulent behavior.
- Failing to report known violations or unethical conduct.
- Misusing company resources or assets for personal gain.
- Discriminating against or harassing colleagues, customers, or partners.
- Breaching confidentiality agreements or disclosing sensitive information without authorization.

2- Consequences of Violations

Failure to adhere to the Code may result in:

- Investigation of the reported violation.
- Disciplinary measures, which may include warnings, suspension, or termination.
- Legal action if the violation involves illegal activities.

Governance of the Code

1- Amendment and Review Control

Ethics & Compliance is responsible for maintaining and periodically reviewing this Code. No material amendment to the Code shall be made unless it has been reviewed by the Ethics & Compliance Team and approved by the Board of Directors. Administrative or non-material updates may be processed in accordance with the Company's approved document governance procedures.

2- Document Distribution

The approved version of this Code shall be made available through the Almarai Intranet and other approved internal communication channels. Employees may be required to complete applicable awareness training and formally acknowledge that they have read, understood, and agreed to comply with the Code.

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