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SENDAN

Code of Business Conduct



Dear Sendan Employee,

Sendan continues to evolve into the company that we envisioned to be. As we set our eyes into the future of Sendan, it is important that we do not also lose sight of who we are and what we should be as a company.

While we focus on managing the continued growth of our business, we also recognize the importance of building our culture – those shared beliefs, principles and practices that shape and define our identity as a company and as Sendan people.

Technologies rapidly change. The business environment is getting even more complex. Competition is tough and getting even tougher. New opportunities and issues continue to emerge. Yet, amidst all these changes and challenges, there are some things that should remain constant - our values and principles.

This Code of Business Conduct sets out the broad standards that shall guide Sendan and its employees now and into the future in our dealings, transactions, and interactions with various stakeholders. These standards are meant to reinforce and strengthen our values and principles.

To realize these standards, Sendan shall operate with policies, guidelines, and procedures which support and reinforce this Code.

These standards shall apply to all employees. Every Sendan employee is responsible in practicing and promoting these standards and avoid doing any action or omission that may ruin or raise doubt on the image and reputation of the company and of their own.

Because this Code does not cover all possible situations, it is important that you seek guidance from your line manager, or HR, or the Management if you are in doubt about the right thing to do in a given situation.



Abdullah Al-Haddad
General Manager



M.D. Ahn
Managing Director and CEO

November 2010

1. Integrity and Fairness

We shall practice integrity and fairness as the cornerstones of all our dealings, transactions and interactions with others.

2. Embracing Diversity

Sendan believes in diversity. Diversity sustains our business. Out of diversity, we know we can, and we do, create powerful synergies.

Thus, at Sendan, employees should treat others with respect and preserve their human dignity regardless of differences in rank, cultures, race, color, religion, conditions, and ideas. Employees should not engage in any form of discrimination, insult, and harassment.

3. Responsible Stewardship

Employees should be good steward of whatever is entrusted to them by the company. Every employee should use company resources, information, privileges, opportunities, including authority and power, prudently and responsibly for the best interest of Sendan and not for personal gain.

No employee should engage in activities that create conflict of interest with the company. If ever employees find themselves into such situation, they should always do what is right by disclosing the conflict to and seeking the consent of the Management.

4. Respect for Confidentiality

Employees should value, respect, and protect sensitive and confidential information about the company and of others.

Employees should recognize that information is a privilege that carries an obligation. Employees should use this privilege responsibly and fulfill their obligation to use such information only for legitimate purposes.

5. Customer Focus

Every employee should always seek and strive to provide the right solutions and services to their external and internal customers.

We strongly believe that our customers are the reasons for our work and for our business. Employees should exert all efforts to understand the requirements of their customers. They should deliver results based on their customers' requirements, always seeking every opportunity to exceed those expectations. Employees should honor their commitments to customers.

6. Fair Competition

We shall pursue business growth vigorously in every market where we compete without resulting to any drastic action that would compromise or ruin our positive image in the market. We shall compete fiercely but fairly.

7. Relations with Suppliers

We shall maintain a mutually-beneficial relationship with our suppliers based on the principles of fairness and integrity.

Employees should deal with suppliers with the best interest of Sendan in mind.

Concerned units shall establish and maintain an effective system of accreditation, selection, and evaluation of suppliers to ensure that we only deal with suppliers with track record of quality, reliability and integrity.

8. Health and Safety

Sendan believes that maintaining a clean, healthy and safe work and camp environment is important for its employees and its business.

All employees should observe and promote clean, healthy and safe practices and to maintain cleanliness at work and in their camps.

Employees should comply with the health and safety standards and policies of the company and of its clients. Sendan shall also impose the same standards and policies to its sub-contractors and suppliers whenever applicable.

9. Social Responsibility

Sendan values social responsibility.

Employees should respect and show sensitivity to the religious, cultural, and social norms and traditions of the countries and communities where Sendan operates.

Every employee should do his share in protecting the environment.

10. Compliance and Reporting

Each employee should understand the provisions of this Code. Full compliance to this Code is mandatory for all employees. Failure to comply with this Code and/or to all its supporting policies and procedures can lead to disciplinary action. Employees should report or raise their concerns if they witness or discover any violations or any practices or actions considered inappropriate under this Code to their Department Heads or HR Manager or to Management.