



Company Name:

## Investor Trading Company

Title:

Anti-Corruption Code and Policy

Issue date

01-01-2011

Rev date

08-03-22

Page 1 of 4

REVISION	HISTORY				
Revision	Description of Change	Author	Reviewed By	Approved By	Effective Date
01	Document title revised from Anti-bribery to Anti-Corruption. Terminology revised to Anti-Corruption	AC Committee	Taha Alsaeed	Dr. Mohammed Kamal	01-03-2022
02	Clause 4.8 revised to include Special case of government officials as per Cisco requirements	AC Committee	Taha Alsaeed	Dr. Mohammed Kamal	08-03-2022

## CONTENTS

1. PURPOSE
2. SCOPE
3. DEFINATION
4. POLICY
5. EFFECTIVE DATE

### 1.0 PURPOSE

This document outlines Anti-Corruption Code of Conduct to be followed by Investor Trading Company (ITC).

This code has been designed to deter wrongdoing and to promote Honest and Ethical conduct in the organization.

### 2.0 SCOPE

This policy applies to all businesses within ITC including all Subsidiary companies. The code of conduct stands mandatory to all employees, workers and all persons engaged on behalf of ITC to carry out our professional services.

### 3.0 DEFINITION

#### 3.1 Code of Conduct



Company Name:

Investor Trading Company

Title:

Anti-Corruption Code and Policy

Issue date

01-01-2011

Rev date

08-03-22

Page 2 of 4

A code of ethics is a set of guidelines that defines acceptable behavior for members of a business or organization.

### 3.2 Ethics

"Business Ethics" is defined as the critical, structured examination of how people & institutions should behave in the world of commerce. In particular, it involves examining appropriate constraints on the pursuit of self-interest, or (for firms) profits, when the actions of individuals or firms affects others.

### 3.3 Bribe

A "bribe" is the direct or indirect offer, authorization, gift or promise to give anything of value to a Government Official or other person, with the intent to obtain or retain business or gain an improper advantage.

### 3.4 Corruption

The misuse of entrusted power for private gain encompassing a variety of issues including bribery conflicts of interests, extortion, embezzlement, and fraud.

## 4.0 POLICY

ITC manages and operates its businesses with integrity, honesty and sustainability and this is a great asset to our organization.

ITC does not involve or engage itself with any person, business, organization or business practice which involves or appears to involve bribery or corruption in any form or which would or may involve or appear to involve impropriety or illegitimacy, regardless of scale or circumstances. As top management of ITC we pledge and commit for zero tolerance towards corruption.


Our Code has been reasonably designed to deter wrongdoing and to promote the following:

### 4.1 Honest & Ethical Conduct

ITC employees are expected to act and perform their duties ethically and honestly and with the utmost integrity. Honest conduct is considered to be conduct that is free from fraud or deception.

### 4.2 Conflicts of Interest

ITC employees must never use or attempt to use their position with the Company to obtain improper personal benefits. Any personnel who is aware of a conflict of interest, or is concerned that a conflict might develop, is required to discuss the matter with a higher level of management.

	Company Name:  <p style="text-align: center;"><b>Investor Trading Company</b></p>		
Title:  <p style="text-align: center;"><b>Anti-Corruption Code and Policy</b></p>	Issue date 01-01-2011	Rev date 08-03-22	Page 3 of 4

#### 4.3 Disclosure

Senior Management are responsible for ensuring that the disclosure in the Company's periodic reports is full, fair, accurate, timely and understandable.

Any ITC personnel shall not knowingly misrepresent, or cause others to misrepresent facts about the Company to others, whether within or outside the Company, including to the Company's independent auditors, governmental regulators and self-regulatory organizations.

#### 4.4 Compliance

It is the Company's policy to comply with all applicable laws, rules and regulations. It is the personal responsibility of each employee to adhere to the standards and restrictions imposed by those laws, rules and regulations.

#### 4.5 Reporting

ITC shall take all appropriate action to stop any known misconduct by fellow employees that violate this Code. To this end, the employees shall report any known or suspected misconduct to the organizations anti-corruption committee via the organization whistleblowing process.

#### 4.6 Accountability

Any violation of this Code may result in disciplinary action, including termination, and if warranted legal proceedings against the employee. Also failure to report a suspicion or occurrence of corruption will be taken seriously by ITC and may result in disciplinary action.

#### 4.7 Fair Dealing

We have a history of succeeding through honest business competition. We do not seek competitive advantages through illegal or unethical business practices. Each employee should endeavor to deal fairly with the Company's customers, service providers, suppliers, competitors and employees.

No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

Any employee who makes a disclosure or raises a concern under the whistleblower policy will be protected.

	Company Name:  <p style="text-align: center;"><b>Investor Trading Company</b></p>		
Title:  <p style="text-align: center;"><b>Anti-Corruption Code and Policy</b></p>	Issue date 01-01-2011	Rev date 08-03-22	Page 4 of 4

#### 4.8 Gift And Entertainment

ITC is committed to conducting all business without undue influence. The Code requires us to exercise good judgment and practice moderation in giving and receiving business gifts and entertainment. Examples of other corrupt activities includes-travel and hospitality, facilitation, political donations, loans from clients/customers, community benefits and club membership, personal favors etc.

Employees are required to be aware that it is not acceptable to give solicit or receive gifts payments, services or other benefits that influence any business decision or that create the appearance of influencing any business decision.

We ensure that neither ITC nor its employees pay any expenses for travel lodging gifts hospitality entertainment or charitable contributions for government officials on Cisco's behalf Government official means: Any public or elected official or officer, employee (regardless of rank),or person acting on behalf of a Governmental Entity; and any party official or candidate for political office or any person acting on behalf of such party official or candidate for political office.

#### 4.9 Anti-Corruption

As top management of ITC we pledge and commit for zero tolerance towards corruption. ITC is committed to abiding by all laws and regulations to prevent bribery and corruption and thus we encourage our employees to comply with all applicable anti-bribery and anticorruption laws.

Corruption can take many forms, and can include behaviors like:

public servants demanding or taking money or favors in exchange for services, politicians misusing public money or granting public jobs or contracts to their sponsors, friends and families, corporations bribing officials to get lucrative deals etc.

As ITC Employees it is your duty to refrain from providing monetary benefits to any entity private or government.

#### **6.0 EFFECTIVE DATE**

This policy is effective from 8th March 2022 and supersedes any other such policy previously in effect.