



ANBI GENERAL TRADING LLC

Tel: +971 4 3361377, Fax: +971 4 3361376, P.O. Box: 112089, Dubai, UAE

Email: info@anbisolutions.com Website: <http://www.anbisolutions.com>

Ethic Policy

Our Creed - We believe in the free enterprise system. We shall consistently treat our customers, employees, shareholders, suppliers, and the community with honesty, dignity, fairness, and respect. We will conduct our business with the highest ethical standards.

1. Reporting of Risks

ANBI is committed to providing quality products and services that meet or exceed the expectations of our customers. Deficiencies that threaten the physical wellbeing of any person or put the financial security of our company at risk should be reported immediately to management. Deficiencies may involve product quality, safety, design, installation, or maintenance.

2. Promoting Health and Safety

The health and safety of ANBI employees throughout the world is of utmost importance. Our work processes and policies are designed to minimize risk. We all must routinely review and improve workplace conditions to ensure a safe and healthful workplace and must report unsafe working conditions anywhere in the world to supervisors and management.

3. Equal Opportunity, Diversity, and Maternity Discrimination

We value and respect the diversity of our employees, officers, directors, suppliers, customers, and communities. We work to eliminate discrimination and harassment in all of its forms, including that related to color, race, gender, sexual preference, age, pregnancy, caste, disability, union membership, ethnicity or religious beliefs. Our company is committed to providing equal opportunity in all of our employment and purchasing practices. This applies to hiring, salary, benefits, advancement, discipline, termination, and retirement. Only in valuing diversity and committing to equal opportunity practices will we be able to fully utilize the human and business resources available to us in our pursuit of customer satisfaction. At the same time, we believe that by valuing diversity we enable all to fully realize their potential.

For ANBI to succeed as a company, our employees must also succeed, as contributors to our company's mission and objectives and as individuals and citizens. Therefore, in addition to protecting their health and safety, we are committed to the development of their unique skills and capabilities and the establishment of supportive communities.

We believe that new experiences on the job and involvement in work teams or special projects are valuable development opportunities. As part of our commitment to employee development, we offer training in technical and interpersonal skills and educational programs, and we work with government and community organizations on programs for workers from disadvantaged backgrounds. The tools, training and support, together with the compensation and benefits provided by ANBI, raise the social and economic opportunities for many employees.

We are committed to providing a workplace that is free of harassment or any other behavior that diminishes a person's integrity and self-esteem. Neither physical nor mental harassment nor abuse will be tolerated.



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Employing children less than the age of completion of compulsory schooling and in any case less than 16 years, or using forced labor, is strictly prohibited. Youth (from ages 16 to 18 years) enjoy all of the benefits of our nurturing workplaces such as training and development programs.

Workers' representatives are not subject to discrimination and have access to workplaces necessary to carry out their respective functions. ANBI respects the special needs of individual employees, including those who are pregnant or are returning to work after childbirth. Paid breaks are provided for nursing mothers as per rules of UAE.

4. Freedom of Association, Work Hours, and Fair Compensation

We respect voluntary freedom of association, including the right to organize and bargain collectively in a manner that is legally compliant. Workers' representatives are not subject to discrimination and have access to workplaces necessary to carry out their respective functions. Except in extraordinary circumstances, our employees work no more than the limits established by law. Employees receive at least the minimum wage required by law or the prevailing industry wage, whichever is higher. Employees are provided benefits and overtime compensation compliant with applicable laws. Wages are not deducted for disciplinary purposes and are paid in cash, check form or by direct deposit. Overall, the compensation and benefits provided ANBI are designed to enable our employees to meet their basic needs, and provide the opportunity to improve their skills and capabilities for raising their social and economic opportunities.

5. Protecting the Environment

We respect the needs and concerns of the communities in which we live and work. This is exemplified in the company's long tradition of caring about the quality of the environment. Our products, services, reflect this concern and our belief that what is good for the environment is good for ANBI. Sound waste management and source reduction practices, recycling and energy conservation are legal, ethical, and business requirements. In meeting that commitment, we implement environmental management systems to ensure continuous improvement and specific measures to prevent pollution, minimize toxic and greenhouse gas emissions, seek ways to use and produce products that are environmentally friendly, and ensure that land development and operations address community concerns and biodiversity preservation.

6. Protecting Employee Privacy

ANBI is committed to providing privacy protection of employee data maintained by the company. Employee data will be used for the sole purpose of supporting company operations and providing employee benefits. ANBI will comply with all local data protection regulations.

The company has put safeguards in place to ensure that personal data is protected from unauthorized access and disclosure, including limiting access to such data only to those employees with a legitimate business purpose. All employees are responsible for ensuring compliance with this employee privacy policy.

7. Protecting the Company's Information

Protecting information about ANBI products, activities, performance, or plans is critical to our company's competitive position and reputation. Good judgment is needed to determine what information can or cannot be disclosed to others.



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Should there be any question as to whether certain information is confidential, employees should consult their supervisor. To limit the potential for important information being used improperly, employees should use “need to know” guidelines even with other ANBI employees.

The use of confidential company information for the personal gain of an employee, officer, director, or anyone else is contrary to ANBI policies and, in many cases, unlawful. Confidential information includes all nonpublic information that might be of use to competitors, or harmful to the company or its customers, if disclosed.

8. Avoiding Conflicts of Interest

The best interests of ANBI are expected to be foremost in the minds of our employees, officers, and directors as they perform their duties. When we become employees of the company, and receive pay and benefits, we make this commitment.

It is wrong to seek any other economic gain by virtue of being a ANBI employee, officer, or director. Giving or receiving anything of enough value to influence sound business judgment is prohibited. This also applies to family, friends and business associates. In addition, discussions of future employment with government officials with whom ANBI seeks to do business must be approved in advance.

ANBI trusts its employees, officers, and directors with information about company activities and with company funds and property. Use of any of these in a way that conflicts with company interests is strictly prohibited. Situations or arrangements that may conflict with company interests must be approved in advance by the employee’s respective business group general manager.

We must also take care that our actions cannot be perceived as serving other interests. While mutually beneficial relationships with customers and suppliers are encouraged, we should avoid situations that offer the potential for problems.

9. Proper Use of Company Information and Company Property

ANBI trusts its employees with information about company activities and with company property. Use of these in a way that conflicts with company interests, or in any manner that may reasonably be considered offensive or disruptive to another employee, is strictly prohibited.

10. Appropriate Use of E-mail, Internet, and Other Computer Resources

Electronic commerce, electronic mail, and other Internet-related systems are intended to be used for company business. Additionally, all information on company computer systems, including electronic mail, is the property of ANBI. Therefore, to ensure that computing resources are used in accordance with expectations, management may inspect and disclose the contents of electronic messages if such inspection and disclosure is made for legitimate business purposes or as necessary to protect the rights and property of ANBI.

Use of computing resources to offend or harass others is prohibited. Employees who use the Internet to access sites that contain offensive materials related to sex, race, or other protected categories, or who otherwise violate these prohibitions, will be subject to discharge.



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11. Integrity of Recordkeeping/Accounting

ANBI documents a wide range of its activities. The integrity of these records is relied upon to make important business decisions and take actions. Therefore, it is essential that all records are accurate and complete. In addition, certain laws require ANBI to maintain specific types of records and documents and to maintain a system of internal controls that reasonably assures that transactions are executed in accordance with management's authorization and recorded to permit appropriate preparation of financial statements.

ANBI books, records and accounts must, in reasonable detail, accurately and fairly reflect the company's transactions and disposition of its assets and must otherwise be prepared and maintained in accordance with law. This responsibility prohibits false or misleading entries regarding both the amount or purpose of transactions, as well as any other misrepresentations or omissions. Some examples of relevant documents and records include vouchers, bills, invoices, financial data, expense reports, bills of lading, submissions to government agencies, performance records and agreements with agents, consultants or other third parties.

12. Anti-Corruption: Political/Governmental Contributions

No contribution of funds or services is to be made to, or on behalf of, any political organization or candidate by ANBI or any of our subsidiary companies without advance approval by the Law Department. Offering any favor, service, entertainment, meal, gift, or other thing of value, directly or indirectly, to government officials or employees in connection with their government duties is prohibited and includes things of value offered to their family members. Throughout the world, direct or indirect contributions to any government officials (including their representatives or family members) that are intended to gain preferential treatment for our company are always prohibited.

ANBI recognizes that in some countries outside the United States it is legal and customary for companies to make certain contributions to political parties and government officials. Nevertheless, no contributions, payments or the provision of anything of value (or the offer or promise of a contribution, payment or provision of anything of value) can be made to any foreign official by ANBI or its subsidiaries, affiliates, employees, officers, directors or agents, directly or indirectly, with the intent to influence the official or secure an improper advantage in order to obtain or retain business. In addition, all contributions or payments, or offers or promises of contributions or payments, to foreign officials must be approved by the Law Department and must be completely and accurately documented in our company's books and records.

ANBI must be familiar with the companies and people with whom it does business. Reasonable due diligence and screening of new business partners, including agents, consultants and distributors, is critical to ensure compliance with anticorruption laws. The company expects that employees will take necessary steps to become familiar with ANBI business partners and implement safeguards to comply with anticorruption laws.

14. Rule of Law

Any employee, officer or director involved in court or other similar proceedings arising out of his or her employment with, or service to, ANBI shall abide by the rules of that forum, cooperate with the orders of that forum, and not in any way commit perjury or obstruction of justice. All ANBI employees must, at a minimum, comply with all applicable laws that relate to the conduct of our business in the relevant jurisdiction.



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15. Defense Security

ANBI and some of its businesses have top secret security clearances. Strict care must be taken to comply with the laws on the protection and disclosure of classified information relating to such businesses. All visits to certain hostile countries, or meetings with their officials anywhere, must be formally reported to the Law Department and appropriate government agency.

16. Antitrust

Planning or acting together with any competitor to fix prices or to agree about the nature, extent or means of competition in any market is against company policy and in violation of antitrust laws. Antitrust laws may also in some circumstances prohibit agreements to boycott, to allocate products, territories, or markets, and to limit the production or sale of products. Using illegal or unethical means to obtain competitive information or gain a competitive advantage over a competitor is prohibited.

17. International Business

ANBI is dependent on the conduct of business across borders. This includes the flow of goods, services and technology between countries and citizens of different countries. It also includes transactions and agreements with various persons and companies throughout the world. The ability to import and export goods, services, and technology efficiently is critical to the effective functioning of ANBI worldwide operations.

Among other things, these laws may require the submission of accurate information regarding importations and exportations to government authorities. They may also restrict or prohibit the importation or exportation of certain goods, services, or technology depending on the nature of the items involved, the parties to the transaction, the ultimate destination, or the end use. In addition, the laws may require government approval prior to a particular importation, exportation, or transfer of technology, goods, or services between countries or citizens of different countries.

It is ANBI's policy to understand and comply with these laws in its business activities in all respects. Failure to comply with these laws can result in civil and criminal penalties for the company and individual employees, officers and directors. It can also result in seizures of merchandise and prohibitions on the ability to do business.

ANBI must be familiar with the companies and people with whom it does business. Reasonable due diligence and screening of customers and new business partners, including vendors, service providers, agents, consultants, and distributors, is critical to ensure compliance with laws that regulate international trade in goods, services, and technology. The company expects that employees will take necessary steps to become familiar with ANBI business partners and customers and implement safeguards to comply with international trade laws.

18. Senior Financial Officers

ANBI principal executive officer, principal financial officer, principal accounting officer or controller, or any person performing similar functions must engage in honest and ethical conduct, including the ethical handling of apparent conflicts of interest between personal and professional relationships. These officers must avoid conflicts of interest. In addition, these officers must make immediate disclosure to the Audit Committee of any material transaction or relationship that reasonably could be expected to give rise to such a conflict.



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ANBI requires full, fair, accurate, timely, and understandable disclosure in reports, documents, and any other public communications made by the company. In addition, all ANBI employees must maintain compliance with applicable governmental laws, rules, and regulations. All violations of the Ethics Policy by a principal executive officer, principal financial officer, principal accounting officer, or controller, or any person performing similar functions should be reported to the Audit Committee anonymously by calling **+971 56 3325898**. Violations are serious matters and will result in disciplinary action.

19. Responsibilities

Each employee, officer, and director of ANBI is expected to carry out his or her work in accordance with the business standards of conduct of ANBI. Managers are expected to implement policies, programs, and procedures and ensure adequate communications as well as ensure internal controls are in place for their business unit to ensure compliance with the spirit and intent of applicable laws and policies. The next high level of management must be notified of any inconsistencies and must establish goals, targets and plans against which progress can be measured. Further, all employees are urged to direct any questions or concerns about the company's activities or these standards to their supervisors or the divisional or corporate human resources departments without delay. This includes customer and supplier activities that may directly affect our operations or employees. Any employee who suspects that a violation of the Ethics Policy has occurred is obligated to report it, and such employees shall be protected from retaliation.

This Ethics Policy supersedes all previous ethics policies. Employees should also be aware that these standards are greater than those that may be required by local law. Adherence to these standards is a condition of employment with ANBI. Violations are serious matters and will result in disciplinary action. Managers and supervisors are responsible for distributing copies of the Ethics Policy to employees, officer and directors, as well as making them aware of the importance and specific requirements of the policy.

The Ethics Policy is not all encompassing, and questions about situations not discussed in the Ethics Policy should be addressed to the Law Department, the Internal Audit Department, the Human Resources Department, or your supervisor.

Employees may anonymously report a violation of ANBI policies by calling **+971 56 3325898**

The company's Ethics Policy is applicable to the members of the board of directors and to all company employees, including, but not limited to, the principal executive officer, principal financial officer, principal accounting officer or controller, or any person performing similar functions.

Effective September 2014