

ANTI-BRIBERY AND ANTI-CORRUPTION

Policy Statement

The following Policy demonstrates the ethical business conduct and compliance with all laws and regulations of Kingdom of Saudi Arabia on payments to any third party (in particular Government Officials) which may be directly applicable to Al Naghi Company as well as compliance with the United States of America Foreign Corrupt Practices Act ("FCPA") and/or the United Kingdom's Bribery Act which may apply to "Al Naghi Company" principals.

This Policy strives to not only protect the interests of Al Naghi Company and its employees but to also protect the interests of Al Naghi Company's business partners, especially those of healthcare professionals ("HCPs") and "Al Naghi Company" principals. Violations of this policy will be grounds for disciplinary action.

Al Naghi Company ("Company") gives itself strict rules on payments (including benefits in money's worth) of any kind to any third party, in particular to Government Officials, by Company rank in file employee and/or top management officer. The provision of a payment or anything of value to, for the benefit of, or at the request of a third party: See Anti-Bribery and Anti-Corruption Manual

1. May only be made for a bona fide and legitimate business purpose;
2. May not be made with an intent to influence the third party inappropriately;
3. May not be in exchange for the award of business or other unfair / improper advantage;
4. Must not be extravagant;
5. Must be provided openly and transparently;
6. Must be properly recorded and adequately documented.

Please note that Al Naghi Company may revise any part of this policy from time to time when necessary.

