



CODE OF ETHICS POLICY

Al Shirawi Group Co.

Silica Hill Middle East LLC (SHME) maintains this policy to guide employees on standards of conduct expected in areas where improper activities could damage the Company's reputation and result in consequences to the Company and employees involved.

- SHME expects all employees to use only legitimate practices in commercial operations and dealings with governmental authorities. "Kickbacks" or "bribes" intended to induce or reward favourable buying decisions and governmental actions are unacceptable and prohibited.
- No employee of SHME shall :
 - offer directly or indirectly any payment, gift, contribution or otherwise to any person or firm, for the purpose of inducing or rewarding any favourable action in any commercial transaction.
 - offer directly or indirectly any payment, gift, contribution or otherwise to any governmental employee for the purpose of inducing, rewarding or withholding of action in any governmental matter.
 - This is not intended to apply to ordinary and reasonable business entertainment or gifts not of substantial value, customary in local business relationships.
- When customers, governmental agencies, or others have published policies with respect to acceptance of entertainment, gifts, or other business courtesies by their employees, such policies shall be respected.
- It is the objective of the Company to comply with the antitrust laws of the United Arab Emirates and other countries applicable to its business operations, and to hold Management employees personally accountable to achieve this objective.
- No employee shall discuss with a competitor or any third party acting for competitor information on any subject which may threaten competitive business practices.
- All employees will promptly report to the reporting manager or Company Director:
 - when requested to make, authorize, or agree to any offer or payment which may be contrary to this Policy.
 - when requested to engage in any activity which may be contrary to this Policy
 - with reason to believe that any other employee is engaged in conduct forbidden by the Policy.
- Any manager receiving any report will promptly report the matter to higher management, conduct an appropriate investigation, and take timely action as required.

Violations of the Policy are grounds for discharge or other disciplinary action.

Disciplinary action will also be taken against any employee who may have deliberately failed to report a violation of the Policy

Ashok Kumar Singh

November 2022

AK Singh General Manager