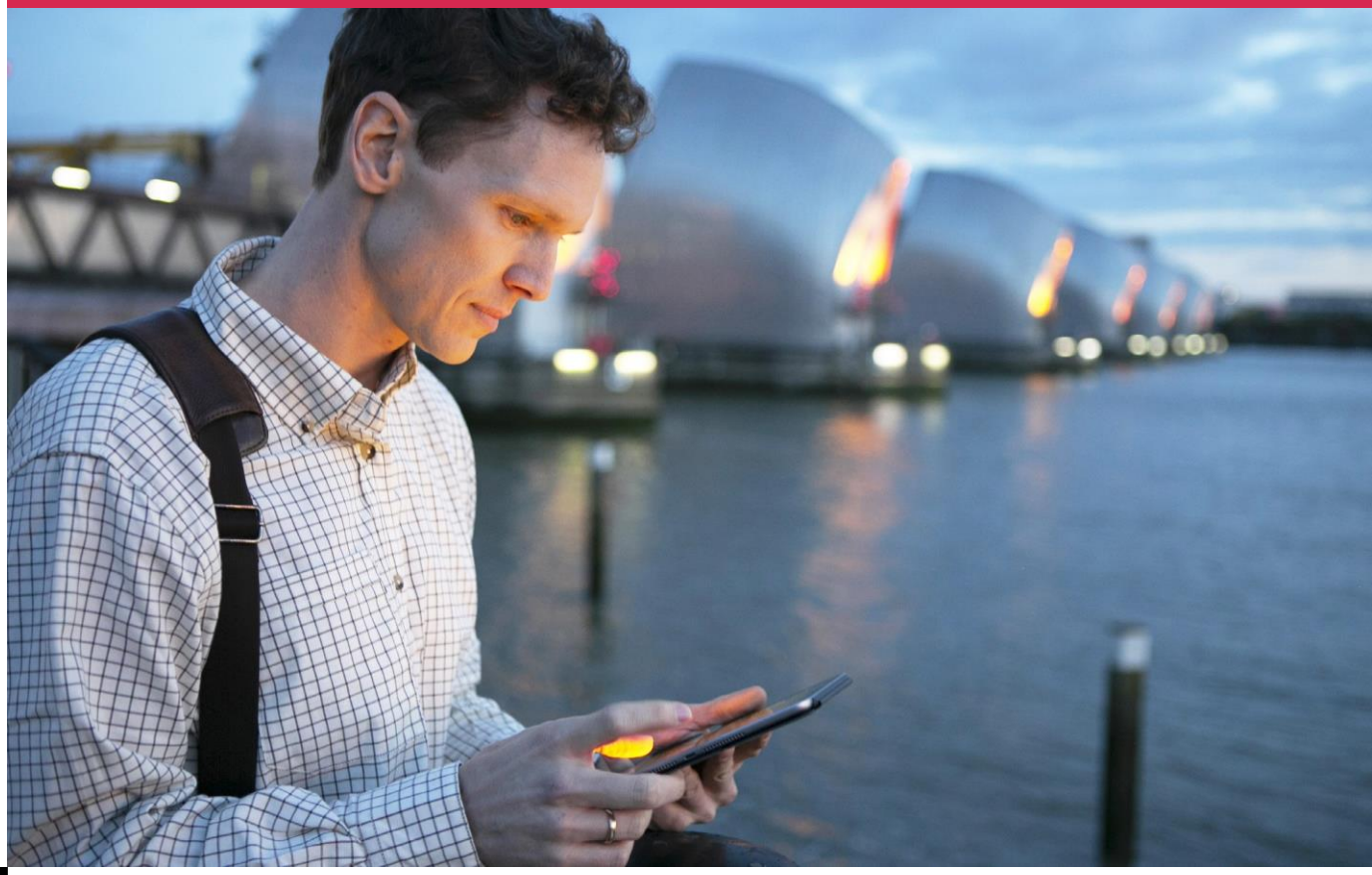
LOCUS ENGINEERING MANAGEMENT AND SERVICES

Code of Conduct

Get answers. Ask before you act.



CEO statement

For more than 5 years, Locus has been guided by a deep commitment to safety, ethics, integrity, inclusion, and belonging -- with people at the heart of our business. Locus Code of Conduct is rooted in these values and provides a framework for how we should interact with our peers, customers, partners, suppliers, and communities.

As we work together to tackle some of the world's most complex challenges, there may be times when we are faced with an ethical dilemma. When we understand our Code of Conduct and commit to these expectations and standards, we are better equipped to successfully navigate issues and prevent harm to our business.

It is imperative that we make the right call and conduct our business with the integrity that reflects our heritage and ethical reputation.

If you have a question on the best course of action in a difficult circumstance – or if you become aware of a possible violation of a Locus policy or law that governs our business – please reach out to your supervisor, the Human Resources department, the Legal Ethics & Compliance department, or the Locus Integrity Hotline.

Our Code of Conduct is a living document that will continue to grow and evolve alongside our ever-changing global market.

I am proud to lead a company that is dedicated to creating a more connected, sustainable world. I am inspired by the depth of talent and character exhibited by our colleagues around the globe. Thank you for reinforcing our culture of caring and for your commitment to doing the right thing each and every day.

Stay safe,

Abdulcader Haleel Rahman
Chief Executive Officer

The Code of Conduct provides an overview of Locus key policies. We do not intend it to be the last word on complex regulations; rather, it is a big-picture overview of company values and employee responsibilities.

It is also a living document. We plan to review and update the Code of Conduct as needed. Just as we strive to continually improve our performance, we are continually improving our Code of Conduct.

We have a reputation as an ethical company — one earned over decades of consistent behavior. But sometimes in the pursuit of business objectives, you may encounter issues and situations where the right thing to do is unclear.

Our Code of Conduct can help. Many sections of this document contain links to policies and procedures that provide additional information and guidance. These resources can also be accessed through the Business Management System. Be sure you understand our Code of Conduct and our policies; and, if ever in doubt, **ask before you act**.

We want you to make the right decisions.

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Our purpose and values

While our international presence is far reaching, we pride ourselves on being one company around the globe. We sustain our culture by remaining true to our purpose and values. These guiding principles address how we interact with clients, suppliers, and each other. They shape our global business strategy, define our overarching goals, and serve as a constant reminder of Locus high performing, innovative, and empowered culture. Our purpose and values are a cornerstone of our culture and are foundational to our Code of Conduct.

To create a more connected, sustainable world.

We do things right.

We always act with integrity — taking responsibility for our work, caring for our people, and staying focused on safety and sustainability. We make investments in our clients, people, and communities, so we can grow together.

We challenge the accepted.

We know that to create a better future, we must ask the difficult questions. We always stay curious and are not afraid to try new things.

We aim higher.

We do not settle — always looking beyond to raise the bar and deliver with excellence. We are committed to our clients by bringing innovative solutions that lead to profitable growth and shared success.

We live inclusion.

We put people at the heart of our business. We have an unparalleled focus on inclusion with a diverse team of visionaries, thinkers, and doers. We embrace all perspectives, collaborating to make a positive impact.

Frequently asked questions

What is the purpose of the Code of Conduct?

Our Code of Conduct is the foundation of Locus Ethics & Compliance program. It is one of many tools we use to advance our Purpose and Values and helps guide our strategy as we grow our business and bring value both financially and ethically to our stakeholders. Locus is accountable to many different stakeholders, from our shareholders and Board of Directors,to our clients and business associates, to our employees and their families, and not least -- to the communities where we work and live. This Code of Conduct provides a consistent, companywide statement of our business practices. This includes our conduct while working and thereby establishes the expectations, obligations, and responsibilities of our employees to abide by these business practices. The Code of Conduct is applicable in all situations and circumstances, regardless of local culture or business climate, and regardless of the competitive environment in which we may find ourselves.

Because the Code of Conduct itself cannot address the full range of ethical challenges we face, we offer more detailed guidance and policy statements on the Ethics & Integrity page on Locus Connect.

Who must comply with the Code of Conduct?

This Code of Conduct applies to every employee, director, and officer of Locus, anywhere in the world. This includes majority-owned subsidiaries and joint ventures, and subsidiaries over which Locus has managerial control. Aspects of the Code of Conduct may also apply to agents, consultants, business partners, suppliers, and subcontractors.

Does the Code of Conduct apply to me even if I am not working in a physical Locus office?

Yes. This Code of Conduct applies to you wherever you are performing your work at any given time, and workplace policies and procedures should be understood to include any such location. While the new ways of working will provide flexibility to Locus employees in terms of working on a more distributed basis and from various locations as appropriate to individual employees and the business, the requirements of this Code of Conduct equally apply to those distributed work environments and locations. **Your "workplace" for purposes of this Code of Conduct is wherever you are performing your work at any given time while working.**

Along with our policies and guidelines, the Code of Conduct helps us make **the right decisions for our company**, our communities and ourselves. The Code of Conduct is a helpful, high-level guide for how we behave.

What is my responsibility as an employee?

As an employee, your first responsibility is to read the Code of Conduct and become familiar with its contents. Second, you must participate in the annual acknowledgment and self-certification process confirming that you've read and understood the latest version of the Code of Conduct and agree to complete any other training required for your position. Third, you must follow the Code of Conduct in your daily work. Finally, you must agree to seek advice from your manager, the Human Resources department, Legal, or the Legal Ethics & Compliance department if you are confronted with a legal or ethical challenge.

What is my responsibility as a supervisor?

If you are a manager or supervisor, you are responsible for ensuring that employees who report to you understand and follow the Code of Conduct and applicable policies and procedures. Be a positive role model and create a work environment that is respectful, inclusive, and encourages employees to voice their concerns. Employee concerns should be taken seriously and elevated to the Human Resources department, Legal, or the Legal Ethics & Compliance department as appropriate. It is your obligation as a manager or supervisor to report actual or suspected violations of the Code of Conduct and applicable policies and procedures.

How do I report an actual or suspected violation of our Code of Conduct?

Employees have many ways to seek guidance or report actual or suspected violations of the Code of Conduct. You can contact your manager, senior managers, the Human Resources department, the Legal Ethics & Compliance department (compliance@locusengg.com), the Hotline (https://www.locusengg.com), (+966 555708402), or email askaquestion@locusengg.com. Reports to the Hotline may be made anonymously, where permissible by applicable law. Finally, the Board of Directors/Lead Director and the Audit Committee (audit.committee@locusengg.com) are also available as a resource.
Locus has an open-door policy and encourages employees to raise concerns in the way they are most comfortable doing so.

Can I investigate a violation myself instead of reporting it?

It is important that employees do not conduct their own investigations. Investigations often involve complex legal issues and acting on your own may compromise Locus ability to conduct an appropriate investigation.

Will I get in trouble for reporting a violation?

No. Locus strictly forbids any form of retaliation against an employee who makes a report in good faith out of genuine concern.

What are the consequences if I violate the Code of Conduct?

Violations are taken seriously, and consequences depend upon the situation. All violations are reviewed so we understand the circumstances before acting. Locus has the right to take disciplinary action, including termination, for violations of the Code of Conduct. Any such disciplinary action is based on the severity of the conduct, actual or potential impact on Locus, and in accordance with applicable laws. Some violations may involve civil and criminal liability, and violators may be subjected to incarceration or fines if prosecuted by law enforcement authorities.

Does Locus provide training regarding the Code of Conduct?

Employees must complete required annual training to ensure they understand and can apply the Code of Conduct and relevant policies and procedures to their work. If your position requires additional training, your manager will let you know. In addition to training on the Code of Conduct, Locus provides training on a varietyof topics to ensure that employees have all the tools, knowledge, and information they need to do their work effectively, efficiently, and ethically.

How does the Code of Conduct fit into the Ethics & Compliance Program?

Locus has a comprehensive Ethics & Compliance program to maintain our commitment to integrity and to ensure our compliance with Locus policies and applicable laws and regulations. The Code of Conduct is partof this overall program. It communicates the importance of ethical behavior to our business and provides guidance on requirements and compliance.

The Board of Directors adopted the Code of Conduct as a foundational part of Locus Ethics &Compliance program.

The Chief Legal and Administrative Officer (CLAO), in coordination with the SVP, Chief Compliance Officer, oversees the Ethics & Compliance program. The VP, Legal Ethics & Compliance, manages the department and implements the Code of Conduct in coordination with other functional departments.

See our Ethics & Compliance program on LocusConnect for more information: Company/Ethics & Integrity: Company/Ethics & Integrity.

Integrity

Know the rules and your responsibilities. If you're unsure, **ask before you act.**

Always follow the law

Our general policy regarding compliance with laws

In conducting Locus business, employees, agents, officers, and directors must follow the Code of Conduct. It is Locus policy that we observe and comply with all laws that apply to us – worldwide. In certain cases, our values and ethics require us to do more than the law requires. In all cases, we act with integrity in our business transactions and relationships.

Locus is a global company headquartered in Qatar. Depending on where you live and work, there may be circumstances where you perceive a conflict between this Code of Conduct and the laws or customs of your country.

We are always subject to Qatar laws everywhere we work including those applicable to a private Limited company, while also being subject to the national and local laws in those jurisdictions in which business is actually conducted. To apply one legal system against another is never a satisfactory approach, and there will be times when conflicts must be harmonized. Please consult with the Legal Ethics & Compliance department if you discover a conflict, so an appropriate solution can be determined.

Safety and our Future

Employee health and safety is our top priority.

We extend Locus culture of caring to everyone while working and beyond.

BeyondZero® Commitment

At Locus, we believe the wellbeing of our people is fundamental to our success. Our passion for safety and our courage to care for one another and our environment inspires mutual respect.

BeyondZero is our approach to the health, safety, and security of our people, the protection of the environment and the resilience of our organization. We are proud that in our culture, our people go beyond following rules, procedures, and processes. Our goal is beyond driving statistics to zero. We believe our culture will make our people and communities safe, secure, and healthier -- and this is fundamental to our success.

All employees have a role to play to make sure everyone is physically and mentally healthy, safe, and secure at work, and that our environment is protected. That means following applicable and designated company Health, Safety, Security & Environment (HSE&S) policies, procedures, and instructions; completing assigned training; maintaining the safety and security of work locations; promoting healthy, safe, secure and environmentally responsible work practices with our partners; promptly reporting hazards, environmental impacts, incidents and violations (even minor injuries and "near misses"); participating in and influencing our HSE&S systems, processes, and practices; taking responsibility for your well-being; and being empathetic to others including your family and your colleagues.

For BeyondZero to thrive, it requires everyone to play their part in managing HSE&S risk effectively and proportionately. This means you will need to have the courage to care, to intervene, and to challenge yourself to envision the safest way to complete a task and encourage your colleagues to not accept old mindsets that don't promote HSE&S. Through the commitment to BeyondZero, the exchange of ideas, pursuit of best practices, and decisive action, we will improve our HSE&S performance and deliver better outcomes for our people, our partners and the environment.

Quality BeyondExcellence℠ Commitment

Locus has boldly transformed into one of the leading solutions providers across an array of global markets. We arein a constant pursuit of excellence. In doing so, we are always seeking to enhance our understanding of ourselves and building the systems and processes necessary to deliver on that promise of delivering BeyondExcellence.

BeyondExcellence is our approach to quality and our commitment to executing flawlessly while looking to the future and asking, "how can we do this even better?" **BeyondExcellence begins with each of us, every day, doing what's right, meeting our standards, and challenging ourselves to take the next step.**

Sustainability and Human Rights

PlanBeyond℠ Commitment

Sustainability at Locus means ensuring long-term business resilience and success while positively contributing toward the economy, society, and the environment. Aligned with the United Nations Sustainable Development goals, Plan Beyond is our approach to sustainability — planning beyond today for a more sustainable future for everyone.

As a business, we have a tremendous opportunity to influence positive change through the solutions we create and deliver for our clients. As an employee, you are an essential part of delivering on this promise. It is your knowledge, passion, perspective, and inventiveness that make possible our vision to create a more connected, sustainable world.

Human Rights Commitment

We are committed to respecting the human rights and dignity of individuals within our operations, supply chain, and communities where we do business. We conduct due diligence to avoid complicity in human rights abuses, and we seek to avoid causing or contributing to adverse human rights impacts through our own activities and business relationships. Our approach is guided by international principles including those encompassed in the United Nations founding Principles on Business and Human Rights, and we are a participant in the United Nations global Compact. We expect our employees and suppliers to act in a manner consistent with our Human Rights Policy and to speak up, without retaliation or reprisal, about any concerns.

Acting responsibly in the workplace

Drug and Alcohol Use

Use of alcohol, drugs, or controlled substances while working is unsafe and inappropriate.

You are responsible for abstaining from drug or alcohol consumption that would result in you being impaired while working or unable to do your job.

Your health, safety, and security are our paramount concern. Employees are expected to perform their work free from the influence of alcohol, drugs, or controlled substances. The use of these substances creates an unreasonable risk to personal safety, fellow employees, clients, and the public. Alcohol may be served at certain company functions, but its consumption should be in moderation and you should remember that you remain responsible for complying with Locus policies governing employee conduct.

Violence at work

Employees should be free from violence – or the threat of violence - while working.

You are expected to behave in a safe, respectful, and professional manner while working.

All employees should feel safe and free from violence while working. Violence can range from actual physical assault and damage to property, to threats and verbal abuse. It can take place either at the work location or elsewhere and can occur person-to-person or via many communication methods including social media, email, texting or instant messaging.

Employees are required to report all incidents or threatened incidents of violence at work. Contact authorities in case of imminent danger.

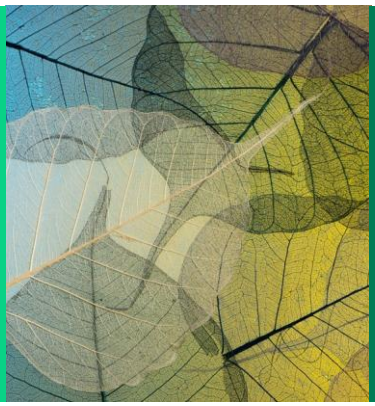
Appropriate Work Conduct

Conduct while working should be professional, respectful, and devoted to business efforts.

You are expected to focus your efforts while working on Locus business objectives and to perform your work in a professional and appropriate manner.

Employees are expected to use their time and energy while working to perform their job responsibilities. Use of Company resources, such as information systems (i.e., computer equipment, company networks, accessing the internet) must be appropriate. Points to remember:

- While we encourage you to communicate and work with your manager to determine the best schedule for you and the company (including as to any flexible work schedule), regardless of the schedule you work, you are accountable for regular attendance (whether working in an office or remotely), communicating with your manager about absences and deviations and getting advance approval for time off and/or flexible hours, completing assigned work, and accurately recording your time in accordance with applicable Company policy and project requirements.
- Company Information Systems. Transmitting, displaying, or viewing images, words, graphics, or other media that are or could be discriminatory, harassing, offensive, or threatening in nature is prohibited during work or on Company information systems.
- Software Usage. You may not use, publish, or share on Company information systems any copyrighted software, media, or other materials owned by third parties unless permitted by that third party. Downloading illegal copies of music, films, games, or other software is also prohibited.



Interacting with others

We live inclusion and believe in treating all employees fairly. You are responsible for treating co-workers with respect.

At Locus, we put people at the heart of our business with our Together Beyond strategy. This means promoting inclusion and belonging, celebrating diversity, and approaching everything we do with acceptance and respect. We expect our employees, our colleagues, clients, and partners to treat one another with dignity and respect.

Locus is firmly committed to providing a work environment free of discrimination or harassment for any reason, including but not limited to, race, religion, creed, color, national origin, ancestry, sex, age, medical condition, marital or domestic partner status, sexual orientation, gender, gender identity, gender expression or transgender status, mental disability or physical disability, genetic information, military or veteran status, low-income status, or any other status or characteristic protected by applicable law. Conduct that creates an intimidating, hostile, abusive, or offensive work environment is unwelcome at Locus regardless of whether it is acceptable within local norms, legal under the local law, or is acceptable in a country where we are working. What may be common behavior in certain countries because of local customs may still be a prohibited conduct for employees because it is not consistent with our company Values and policies.

Our team reflects a wide variety of cultures, backgrounds, and experiences. Empowering all employees to have a voice and provide their unique perspectives is fundamental to our growth and success. We make every effort to attract and retain smart, accomplished, professional, talented, and pleasant people for our employee-friendly work environment. If you are bad-mannered, belittling, condescending, demeaning, unreasonably difficult and unpleasant, misuse your management authority to bully or intimidate others, or ignore our Values, you are failing to live up to and embody Locus Values.

> “Inclusion means being open and curious about other people’s experiences, learning from each other, and challenging our assumptions. Living inclusion creates an environment where all employees are engaged and thriving – this is critically important for our Locus’s culture and good for our business.”
>
> – Abdulcader Haleel Rahman
> Chief Executive Officer

Handling personal data

Processing personal data lawfully and securely is everyone's responsibility.

You are responsible for handling personal data in a confidential and secure manner.

The protection of personal data has emerged as a significant concern in an era of rapid technological changes. Many countries have responded by strictly regulating the handling of personal data. Locus complies with these laws in the countries where we operate by maintaining controls regarding personal data collection, access, security, and destruction. Privacy laws vary across different jurisdictions, but as a global company, we have designed our policies to work across all regions and to apply to all employees. We work to protect the privacy of our employees, clients, and business partners, no matter where they live or work. Personal data may be processed only in a lawful, fair, and transparent manner. If you are entrusted with personal data, you must protect its confidentiality, use it only as intended, and keep it secure. If you learn that personal data has been improperly accessed or exposed, you should immediately notify your manager, the Privacy Team (privacy@Locus.com) and Locus Cyber Security organization.

Defining personal data

Personal data is any information or set of information in any form that can directly or indirectly identify an individual. It can be contained in personnel, medical, or other records. Common examples of personal data are date of birth, identification documentation and numbers, passport information, photographs, address and contact information, and payroll and banking records. Personal data can also include education details, health and employment history, group membership and affiliations, and opinions about an individual's performance or abilities.

Engaging in our communities

We believe in using our voice as a corporation to educate public officials and secure support for our priorities.

You are encouraged to be a responsible and active citizen in your community.

In the United States, Locus may make contributions to political candidates or express our views through contributions to political activities that do not involve the election of candidates. Except as permitted, we do not use company funds for contributions to candidates. You may not make political contributions (e.g., money, time, or resources) on behalf of Locus. We encourage you to personally support political causes that are important to you; but such support must be done outside the office, on your own time, using your own resources, and in your own name. Further, some state and local jurisdictions may attribute certain types of political contributions by some Locus personnel (or their close family members) to the Company. Please familiarize yourself with the Corporate Sponsorships and Political Contributions Procedure to understand how such restrictions may apply to you.

Locus sometimes uses its corporate voice to educate public officials and promote government support for relevant issues. Contact with government officials is highly regulated. You may not contact officials to advocate on behalf of Locus regarding a policy, regulation, contract award, or legislation unless the action has been approved by executive management.

Points to remember:

- **Political Action Committee (PAC).** The PAC accepts donations from eligible employees to support candidates and issues that are deemed favorable to Locus. Participation is personal and voluntary. Coercing others to contribute to or support the PAC or any political position is prohibited. Except for the PAC, you may not make any political contribution on behalf of Locus.
- **Employee Giving and Volunteering.** Employee donations and volunteering is amplified through the Collectively program where there are over two million eligible charities. Employees are encouraged to volunteer in their communities and may do so on company time up to a specified number of hours per year.
- **Company charitable donations.** Employees can request company charitable donations in line with the Collectively program strategic causes: STEAM (Science, Technology, Engineering, Arts and Mathematics) education, Inclusion & Diversity, Health & Wellbeing, and Sustainable Development. All requests are reviewed by a Regional fiovernance Committee to ensure alignment with company values and strategic cause areas.

Protecting company assets and equipment

We believe in protecting the value of our Locus assets as well as safeguarding the property of others.

You are responsible for treating Locus assets and equipment carefully and protecting them from waste, loss, damage, and abuse.

At Locus, the assets of our company—that is, things of financial value—belong to our shareholders. This includes tangible assets such as buildings, furnishings, office equipment, tools, vehicles, cash, and other property used in the execution of our jobs. It also includes intangible assets such as data, designs, processes, information resources, company time, and intellectual property. We are responsible for protecting these assets and using them in an appropriate, efficient, and economical manner. Similarly, property owned by others—that of coworkers, suppliers, and customers—may not be used without permission.

Points to remember:

- **Use of equipment.** Locus equipment, including computers, copiers, telephone, internet, and email communication equipment should be used for the benefit of Locus. Locus equipment may never be used for offensive or illegal purposes, conducting personal or other business, or helping a competitor. Employeesare expected to use good judgment for their occasional personal use of Company assets. Such personal use must be reasonable in duration, must not result in significant added cost, and must not interfere with our business or productivity. Employees should have no expectation of privacy when using Company resources (except in the rare instances when dictated by applicable local laws).

  If you are issued communications, IT equipment, furnishings, or any other Locus property for business purposes, the equipment (and its contents), furnishings, or other property remain Locus property and mustbe protected and returned at the time of your employment termination or upon request, whichever is earlier. Any loss or theft must be immediately reported.

- **Protecting company systems.** Locus systems may be used to process or store data, records, or communications; and may be linked by computers or networks. You must follow all Locus security protocols, including the protection of passwords or access numbers to prevent unauthorized use of these systems or networks. You are responsible for the security of information accessed or modified under your password or access procedure.

  Our employees are one of the strongest defenses we have to withstand the ever-changing methods used by cyber criminals. It is your responsibility to understand and comply with Locus cyber security requirements, including your completion of Locus cyber security training. You must promptly report all information security events, suspected vulnerabilities, or potential data incidents to your manager, the local IT support team, and Locus Cyber Security organization.

- **Use of software.** Only approved and licensed software may be placed on Locus equipment, and only after it has been checked for viruses prior to installation and use. You may not make unauthorized copies of software programs or use personal software on company equipment.

Safeguarding client information and business intelligence

We believe in protecting the confidential information entrusted to us.

You are responsible for taking appropriate measures to ensure the security of sensitive information.

Information is a valuable asset of our Company, our clients, and our suppliers. Information that is unknown to the general public and that could disadvantage someone by its release is defined as confidential. Releasing confidential information can harm our interests. Similarly, misusing information from others violates their trust in us. In any contact or interaction, you should have a clear understanding of what information you are receiving, how you are to deal with it, and what you are to use it for.

Points to remember:

- **Honest and transparent communications.** Our relationships are founded on honesty and transparency. We value honesty not only because it is the right thing to do, but also because it contributes to business profits and productivity. Sometimes being honest means speaking up when something isn't right; but even when voicing a concern or complaint, be sensitive in how you craft your messages, and remember the difference between fact and opinion. Honesty extends to our sales materials, which must characterize us fairly and accurately.
- **Ensuring confidentiality.** Protecting confidential information requires a deliberate and disciplined approach. Only accept sensitive or proprietary information from clients or suppliers when you really need it. When creating confidential information, handle with care. Familiarize yourself with the system of controls we have in place to manage the receipt, use, and destruction of proprietary information, so that you can comply with this process.
- **Exposure to confidential information.** Do not seek out confidential information unless it is vital to the completion of your duties. fiet advice immediately if you are inadvertently exposed to or receive confidential information that you are not supposed to be in possession of as part of your job. If you receive a request to provide confidential information to a Locus employee or anyone without a need to know, please report the request to your manager, the Legal department, or the Hotline.
- **Gathering business intelligence.** We regularly gather information about our competitors to help us make business decisions. To ensure fair competition and maintain our reputation, the information we gather must be publicly available. You may not seek information through illegal means or by misrepresenting yourself, misusing consultants, or exploiting proprietary information or trade secrets. Finally, our agents, consultants, suppliers, and partners must be bound by the same requirements.

Acting with integrity and avoiding conflicts of interest

We believe in conducting business with integrity, while avoiding conflicts of interest and personal gain.

Act with integrity, avoid conflicts of interest, and make decisions in the best interest of Locus.

A conflict of interest is a situation where the interests of Locus come into conflict with the interests of an individual.

Conflicts of interest can cloud judgment, impair objectivity, and interfere with good decision-making. You should never achieve personal gain through a Locus transaction or using Locus information. Corporate opportunities belong to Locus. Even creating an appearance of conflict should be avoided. If a conflict (actual or apparent) exists, it must be disclosed and evaluated by a disinterested third party. If you find yourself in a situation that involves an actual or potential conflict of interest, immediately contact your manager, the Human Resources department, or the Legal Ethics & Compliance department.

Points to remember:

- **Insider trading.** Stocks or other securities may not be purchased or sold while in possession of "material non-public information." This is defined as information that a reasonable investor would consider important in making an investment decision and is not known to the general public. Locus financial results, financial projections, a material acquisition, or joint venture, and material litigation that hasn't been broadly disclosed to the public are just some examples of material non-public information. This also applies to information about our clients and partners. You are also prohibited from disclosing material non-public information to anyone other than those within Locus whose jobs require such information. You may not provide "stock tips" to family members or others who may trade on the basis of such information. Additionally, our directors, senior management, and others who regularly have access to material nonpublic information (known as "insiders") must obtain pre-clearance before trading in Company securities and are subject to trading blackout windows. Insiders are also restricted from shorting, hedging, or pledging Company stock.
- **Business with friends or relatives.** Avoid conducting business with friends or relatives and take care not to be influenced by secondary interests. Business with friends and relatives can result in the appearance of, if not actual, favoritism, cronyism, or nepotism, and give someone an unearned advantage. This is unfair and breaches your primary duty of loyalty to Locus.
- **Operating a competing or other side business.** Operating a business that competes with Locus is prohibited. Operating any other kind of side business may also be a prohibited conflict of interest and violate your primary duty of loyalty to Locus.

- **Personal conflicts.** You may not supervise anyone in your family. Furthermore, a family member working for a client or competitor can create a conflict of interest or the appearance of a conflict, as can having a financial interest in or receiving compensation from a competitor or supplier. Romantic and/or sexual relationships between a subordinate employee and anyone who has direct or indirect supervisory authority or is in a position of authority over the subordinate employee undermine the atmosphere of trust essential to the employment relationship and gives rise to a personal conflict of interest. Consequently, it is a violation of the Code of Conduct and Locus policy for you to become involved in a romantic and/or sexual relationship with a supervisor or a subordinate.
- **Disclosure.** You are required to fully disclose any actual or apparent conflicts—personal, social, political, or financial—at the earliest point you learn of your obligation after you begin employment (if it arises as a result of your hiring) or prior to entering into the relationship (if it arises after you begin employment).

Interacting with the media

We maintain Locus reputation by presenting a consistent message to the media. In order to do this, employees are prohibited from speaking to the media on behalf of Locus without explicit permission from Global Communications. You are responsible for seeking approval from the Chief Strategy and Communications Officer prior to any interaction with the media on behalf of Locus.

Locus enjoys the well-earned reputation of a company that follows the highest principles of conduct, integrity, and ethics. In our interaction with the media, we are careful to protect that reputation—and the reputations and confidentiality of our clients—above all else. We also have special considerations and legal responsibilities as a private limited company and must adhere to the rules of the Ministry of Commerce and Industries (MOCI) as well as other agencies on occasion.

For these reasons, all media interaction at Locus is facilitated by global Communications. Employees are not official spokespersons and may not participate in interviews or make public announcements or statements to the press on behalf of Locus without the prior approval and participation of global Communications. If you are approached with a media inquiry or interview request, notify global Communications as soon as possible so the opportunity can be reviewed, and appropriate action taken. Likewise, all technical papers, presentations, and client materials that mention Locus must be reviewed and approved by global Communications prior to submission for publication or presentation at a conference or trade show to assure that copyright and intellectual property considerations are properly dealt with.

Images and photography are critical components of our brand, as outlined in our Visual Identity section in Locus Brand guide. Photography and image use often has stringent copyright, trademark, licensing, intellectual property, right-to-privacy, and client permission requirements. While following our visual identity, you must comply with the rules outlined in Locus Images & Photography Style guide.

Locus is proud of the accomplishments and contributions of our employees and of the work we do. By following Locus media relations policies and procedures, we can share significant news about our company's activities with the public while ensuring that the information is appropriate, factual, consistent and in the best interests of our clients and our company.

Interacting online

Online activities can provide social, professional, and personal benefits, but can also pose a risk to Locus if misused. You are responsible for your online actions.

Exercise good judgment when using the internet for personal or professional activities. Social media (such as LinkedIn, Facebook, Twitter, and any other service that allows open exchange over the Internet) has enormous potential for opening communication, but also carries risks. Standards of honesty, discretion, and confidentiality are as essential online as they are in any other setting. You should never release nonpublic financial or operational information about your work at Locus.

When you communicate online, you are representing yourself; you are not a Locus spokesperson. You should make it clear that your communications represent your personal views and do not represent Locus views. It is never permissible to disclose confidential, proprietary, or nonpublic information related to your work; whether it belongs to us, a customer, partner, or supplier.

Online communication is public and permanent. Whether expressing an opinion or merely chatting, take precautions to use good judgment. If your online activity violates these provisions or policies, such as those that prohibit harassing, discriminatory, and threatening behaviors, if Locus is made aware of your online communications (e.g., due to complaints from another employee, a client, or a member of the general public) and/or if you publicly hold yourself out as a Locus employee, you may be subject to discipline, up to and including termination, if you engage in such harassing, discriminatory, or threatening behaviors. You should keep in mind that while you are not a Locus spokesperson, if people can identify you as being employed by Locus, your online activity can still have an impact on Locus reputation and influence others' perceptions on our values and principles.

This Code of Conduct does not restrict communications by employees about wages, hours, working conditions, unionization, or other terms and conditions of employment, nor does it interfere with the rights of employees under applicable law. This Code of Conduct also does not prohibit you from reporting conduct to, providing truthful information to, or participating in any investigation or proceeding by any government agency or self-regulatory organization.

Competing fairly

We maintain competitive advantage through fair and honest means.

You should comply with antitrust laws to ensure we compete fairly and with integrity.

Locus provides services of the highest caliber and has no need to compromise its integrity to succeed. We are committed to complying with antitrust and fair competition laws and believe everyone benefits from open and free markets. Competitive advantage is earned through superior performance, not through unethical or illegal business practices.

We do not agree to employee non-solicitation agreements with third parties' absent evaluation and approval from the Legal department. We also do not share bid information or agree with competitors to divide markets, allocate customers or locations, or direct the outcome of the bidding process. Our prices are determined by the costs we incur, the value we provide, and the risks we assume.

Points to remember:

- **Rules we must follow.** Many countries, including the QATAR and the European Union, have laws that define anti-competitive practices. fienerally, illegal practices are defined as any agreements—written or informal—that fix prices, restrain trade, or promote anti-competitive activities. This can include agreements not to solicit another company's employees, particularly when outside the context of a corporate transaction (such as an acquisition or divestiture) or in some cases, a teaming agreement.
- **Dealing with competitors.** There is certain information we may not share with competitors such as prices, pricing policies, terms and conditions, trade secrets, intellectual property, and business strategies - whether ours or someone else's. Similarly, we may not disparage, mislead, or misinform competitors. Information passed on during trade shows, through industry associations, and industry surveys should be monitored for possible violations of these rules.
- **Agents, suppliers and subcontractors may also be sources of improper information.** The exchange of information with other third parties can also give rise to antitrust concerns depending on the nature of the information that is shared and when the purpose or likely effect of the exchange is to hinder competition.

Maintaining records and documents

Properly maintained business records provide a necessary framework to support decisions in day-to-day operations. You are responsible for keeping records that are timely, correct, and complete.

Business documents play a significant role in some of our important tasks, including financial reporting, personnel management, project execution, and regulatory compliance. Regardless of their purpose, you are required to prepare records that are timely, accurate, complete, detailed, and understandable. You must be able to back up information on records so they are supportable and auditable. We do not tolerate falsification or alteration of records.

Points to remember:

- **Proprietary or confidential information.** Many of our business documents contain information that must be protected from improper use or release, either because of the nature of the information itself (for example if it is private, unique, or valuable) or because of the requirements of a contract or regulatory authority. We safeguard the security and confidentiality of documents commensurate with the sensitivity of the information in them. Disclosure requires proper prior approval and a legitimate business need.
- **Labor Accounting.** Time is a precious Company asset. We bid it, sell it, and bill for it. Time is the primary source of our revenue and critical to our profitability. A timesheet is the legal authority to both pay an employee and get reimbursed by a client. Our policy requires that employees provide an accurate and timely accounting of their hours worked and leave used.
- **Financial statement reliability.** We routinely file certified financial statements for the investment community and the public. As a Qatari Private limited company, we are required to create and maintain a system of controls thatis designed to assure the reliability of our financial records. You must understand the internal controls relevant to your position and commit to following policies and procedures for complete and accurate accounting. Controls undergo regular testing by internal and external auditors to assure the information we provide the Ministry of Commerce and Industries complies with regulations, standards, and practices.
- **Records retention.** Individuals in project and corporate support positions are responsible for planning the record management needs of their operation through a planning process that identifies legal and contractual retention requirements, defines access, delineates preservation and storage, and sets destruction schedules. Records may not be destroyed contrary to directions, Locus Records Retention policies, or if there is a reasonable possibility they will be necessary to an investigation or litigation.

Preventing bribery and corruption

We win jobs and execute work honestly, without resorting to bribery, corruption, or kickbacks. You are responsible for understanding and following our anti-corruption policy.

At Locus, we develop and maintain business relationships without giving improper gifts, taking unfair competitive advantages, or receiving kickbacks. We win and execute our work honestly and ethically, whether in our dealings with public entities and government officials, or the private sector. Every country in which we operate has laws against corruption. It is a crime to offer, promise, pay, or receive anything of value to secure and maintain business or gain an improper advantage, and a violation of our ethical standards to fail to execute work honestly and ethically. These laws restrict us in giving business courtesies to government officials. Anything of value can be a bribe or create the false impression of a bribe. Keep in mind that even the perception of corruption harms our reputation, and we strive to avoid even the appearance of wrong-doing.

Points to remember:

- **No bribery or corruption.** At Locus, we do not offer or accept bribes or kickbacks in any form, and we do not tolerate corruption in connection with any of our business dealings. You may not offer or receive bribes or kickbacks to, or from, any individual, whether that individual is a government official or a private party.
- **Offering gifts and hospitality.** fiifts, hospitality, and other business courtesies must be carefully handled to avoid even the perception of corruption. This is particularly true when dealing with government officials. Hospitality may be offered to clients when it is permitted by law, consistent with customary business practices, and when the client's policy permits it. Hospitality or modest refreshments offered during business hours in an office setting are generally allowed. fiifts or other courtesies must be reasonable, modest, infrequent, and offered with no expectation that anything will be provided in return. Before you offer any gift or hospitality, you must familiarize yourself with the fiift and Hospitality Policy for further detailed guidance which may prohibit such business courtesies or require advance written approval if they exceed certain monetary thresholds. You must also familiarize yourself with any applicable client policy prior to offering any such business courtesies.
- **Soliciting or accepting gifts and hospitality.** You may never request or solicit a gift, hospitality, meal, or anything of value. When offered on an unsolicited basis (unless you are in a procurement role), you may accept small memorabilia or promotional items of modest value. fiifts must be infrequent, transparent, and received with no obligation or expectation of a reciprocal action. Before you accept any business courtesies, you must familiarize yourself with the fiift and Hospitality Policy for further detailed guidance that may prohibit your acceptance of such gifts or hospitality or require advance written approval if they exceed certain monetary thresholds. You must also familiarize yourself with any applicable client policy prior to accepting any such business courtesies.
- **Making facilitation payments.** Payments made to expedite routine government actions — known as facilitation payments — are prohibited. Facilitation payments are typically demanded by lower level officials in exchange for providing services to which one is legally entitled without such payments. While they may be small in value, or even customary, facilitation payments are illegal in most countries.
- **Due Diligence on third parties.** Locus may be liable for actions taken by a third party (e.g., supplier, sales agent, Joint Venture Partner). Before we form a business relationship with a third party, we must conduct due diligence on the backgrounds and business practices of all individuals and entities who will act on our behalf. All required internal approvals must be obtained before contracting with a third party.

For further discussion:

- **Defining bribery.** Anything of value can be a bribe. This includes cash or a cash equivalent and also includes but is not limited to discounts, gifts, use of materials, facilities or equipment, entertainment, drinks or other hospitality, meals, transportation, lodging, insurance benefits, investment opportunities, tuition, political or charitable contributions, or promises of future employment to an individual or one of their relatives.
- **Defining kickbacks.** A kickback is when a supplier or subcontractor offers or pays us a bribe to improperly influence our judgment. Sometimes the bribe may be included in the subcontractor's offered price.
- **Defining government officials.** Any officer or employee of a national government or any state, province, county, city, or other regional or local government; or any department, agency, or instrumentality thereof, or of a public international organization; or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or on behalf of any such public international organization; or an official of any political party, or a candidate for political office or anyone acting on their behalf; or a member of a royal family, tribal chief, or other person with government immunity or status.
- **Defining improper advantage.** An improper advantage is anything to which Locus was not clearly entitled possibly through collusion or coercion. In other words, it is a preference or benefit that has been secured improperly, regardless of the cost expended or the value received.
- **Defining collusion.** An agreement or arrangement for illegal, deceitful, or improper purposes.
- **Defining coercion.** A threat or use of force or power to compel an action or decision against one's will.

Complying with international trade laws

We comply with trade laws and we comply with all relevant restrictions.

You are responsible for understanding trade laws, restrictions, or sanctions that apply to your work, and for seeking expert advice whenever necessary.

Export control laws govern international trade and affect the transmission of goods, services, and technology across national borders. The Qatar and other countries restrict the shipment, transmission, and transfer of certain types of information, technologies, or products overseas or to foreign nationals on Qatar soil. The rules also apply to "re-exports" from one foreign country to another.

We recognize that countries have differing regulations regarding commerce, and that some may conflict with those of the State of Qatar. As an employee of a Qatar based organization, you must comply with Qatar rules, no matter where you are located or where you are doing business. Consult with the Legal department if you discover a conflict between Qatar law and applicable local law.

Our Company does not conduct commerce with countries against which there is a Qatar approved embargo or other prohibition. We comply with Qatar antiboycott laws that prohibit refusing to do business with certain countries, people, or organizations, and we report requests for boycott information when required.

Points to remember:

- **Complying with export restrictions.** Our goods and services are produced in many countries and shipped across many borders; therefore, the rules can become very complex. Not adhering to them could expose Locus and individuals to fines, penalties, and other more serious consequences. It is crucial that you seek advice on trade regulations from your office's legal representative before making commitments or engaging in action. This is also true if we have partners or agents acting on our behalf.
- **Exempt activities.** Although many of our activities are exempt from export controls, some may be restricted or require a license. Even if our activities are excluded or exempted, regulations dictate that we must be able to document that certain activities do not require a license and provide a record of export control reviews demonstrating the exemption.
- **Conflicts with QATAR and other applicable sanctions.** As an employee of a QATAR registered company, you are responsible for complying with any QATAR sanctions that may be in effect. Host country sanctions may also apply. If you are in a situation where host country sanctions conflict with QATAR sanctions, seek advice from the Legal department. In general, the most severe or restrictive sanction usually applies in such situations.

Working with the government as a customer

We meet the unique requirements of public-sector clients through ethical and transparent business practices. You are responsible for understanding and complying with Locus public sector policies.

Doing business with public-sector customers often means following different rules than those for private sector clients. Locus strict compliance programs for government clients ensure that we meet all the qualifications of public-sector contracting. These programs, combined with our integrity and operational excellence, boost our reputation, and contribute to our status as a market leader. You need to know how these programs and policies affect you, and you must always act with awareness of these issues when dealing with public clients.

Additionally, this prohibition limits our ability to hire or even discuss employment opportunities with federal employees who are or were substantially involved in Locus projects, (or who had staff reporting to them who were personally and substantially) involved in Locus projects. Please understand that these prohibitions may apply to other public-sector work as well.

Points to remember:

- **Procurement Integrity.** The QATAR and other governments — as well as many other public sector entities — prohibit obtaining, using, or disclosing contractor bid, proposal, or source selection information. This applies to Locus, our agents, and current or former government employees.
- **Working with our experts.** We've built a strong team of experts in public-sector contracting who understand the complications of these rules. These experts act as a resource for the entire Company. If you need advice on this topic, reach out to the following:
  - Contracts Management firoup
  - Legal department
  - Special accounting and estimating employees in the Accounting and Finance firoup.
  - Business Development employees who sell to public sector agencies.
  - Supply Management
- **Working with classified or restricted information.** When working on a project that involves access to classified information you must follow the guidance provided to you by your Designated Security Representative and government Contracting Activity. When working on projects that have special handling procedures but are not classified in nature, you must follow the requirements set forth by the customer to include, but not limited to:
  - Specific marking requirements
  - Use of email storage
  - Dissemination of printed documents
  - Electronic storage of data and any specific access requirements.
  - Appropriate disposal requirements
  - Use of appropriate security measures regarding passwords.
  - Keep track of equipment
  - Lock files containing sensitive data
  - Take particular care to keep systems and sensitive data secure from unauthorized access.

Business practices for government clients

- Accurate and complete timekeeping is required for all projects, but for the QATAR government, time entriesbecome legal documents. Keeping them correct is the law.
- government may be entitled to more cost and pricing information than we would necessarily provide to private-sector clients.
- government proposals may include details of our business systems to prove we can support performance. For some types of contracts, we must be pre-qualified to bid.
- Embellishments or exaggerations are not allowed. Anything we say or write must be truthful. This goes for our dealings with private sector clients as well.
- We often transfer work between lines of business, but this may not always be acceptable for government clients. Selling to affiliates or subsidiaries is guided by rules on what may be charged and how work must be documented. Know the rules before you act.
- government clients regularly evaluate our performance, and these evaluations are then used by our government clients in awarding future contracts. Some local and foreign governments may also post such performance information publicly.
- Public clients may have broad audit rights that allow them to review almost every document prepared for a project. Within certain limitations, clients can even interview employees. If a government representative visits your office, immediately contact your manager and/or Legal department for advice on how to handle the situation.
- Our ethics and integrity program fulfills requirements of the QATAR government to promote ethical behavior, prevent illegal violations, and investigate allegations involving fraud, conflict of interest, bribery or gratuity violations or false claims. Federal regulations (Contractor Code of Conduct of Business Ethicsand Conduct) requires us to disclose violations and provide full cooperation to the QATAR government.
- Specialized business requirements for government clients apply not only to our employees but also extend to everyone involved in a project, including partners, representatives, suppliers, and subcontractors. We must ensure that all parties we work with comply.

Expert advice is just a click away.
askaquestion@Locus.com

Investigating violations and prohibiting retaliation

We conduct fair and thorough reviews of possible non-compliance with our policies, and appropriate consequences for violations will be enforced. We do not retaliate against people reporting misconduct. You are responsible for cooperating with audits and investigations, being truthful and complying with corrective measures.

We encourage employees to report any questionable accounting and auditing practices, policy violations, or other wrongdoing. You may do this in confidence, anonymously where allowed by law, and without fear of retaliation. Additionally, the QATAR and many other governments around the world provide protections to those who report violations.

We conduct audits and internal investigations to check for compliance with policies and rules, to follow-up on reports of non-compliance, and assess the effectiveness of our programs. We strive to be prompt and fair in our investigations. We cooperate with government investigations and inquiries to the greatest extent possible. Should you be informed of any warrants, subpoenas, or court orders regarding your work, you must contact the Legal department immediately. If you are involved in an investigation, you are expected to cooperate fully, be truthful, and comply with corrective measures.

We do not retaliate against individuals who engage in activities that are consistent with Locus policies, refuseto engage in unlawful activities, or make a good-faith report of actual or suspected wrongdoing or policy violation. No employee shall be discharged, demoted, suspended, threatened, harassed, or discriminated against in the terms and conditions of employment for such actions, refusals, or reports.

We will take all reasonable steps to protect and respect the rights of a person who reports alleged improper, unethical, or illegal conduct or who participates in an investigation. If you become aware or are concerned about departures from, or an attempt to depart from, the Code of Conduct, or other improper, unethical, or illegal conduct, please contact the Legal Ethics & Compliance department at compliance@Locus.com or through the Locus Integrity Hotline at https://integrity.Locus.com (1.844.543-8351 in the QATAR); see Pages 30-31 for international numbers or askaquestion@Locus.com.

Speak Up, Speak Out! The Integrity Hotline

The Locus Integrity Hotline is available to employees and others who wish to report noncompliance or suspected violations of law and policy, or to seek guidance on specific situations regarding Locus policy.

The hotline is available 24 hours a day, 7 days a week. Reports may be made anonymously when permitted by applicable law at https://integrity. Locus.com or by calling +974 55548644. Locus strictly prohibits any form of retaliation against an employee who makes a report in good faith out of genuine concern.

Instructions for international callers to the Integrity Hotline:

1. Dial the direct access Code of Conduct for the country you are calling from, then wait (for example, if calling from India – dial 000.117 then wait).
2. After a brief pause, you will be directed to an automated OOREDOO line requesting you to dial the number you areattempting to reach.
3. After the prompt, dial +974 55548644.
4. Wait until the Integrity Hotline is answered by an operator, then you may ask your question or report your concern.
5. Ask for an interpreter if you want to speak in a language other than English.

The Locus Integrity Hotline:
+974 55548644 or
https://integrity.Locus.com

For a full list of toll free numbers per country see the following pages.

The Integrity Hotline: toll free numbers

REFER WEBSITE

4. Integrity Hotline | **Toll free numbers**

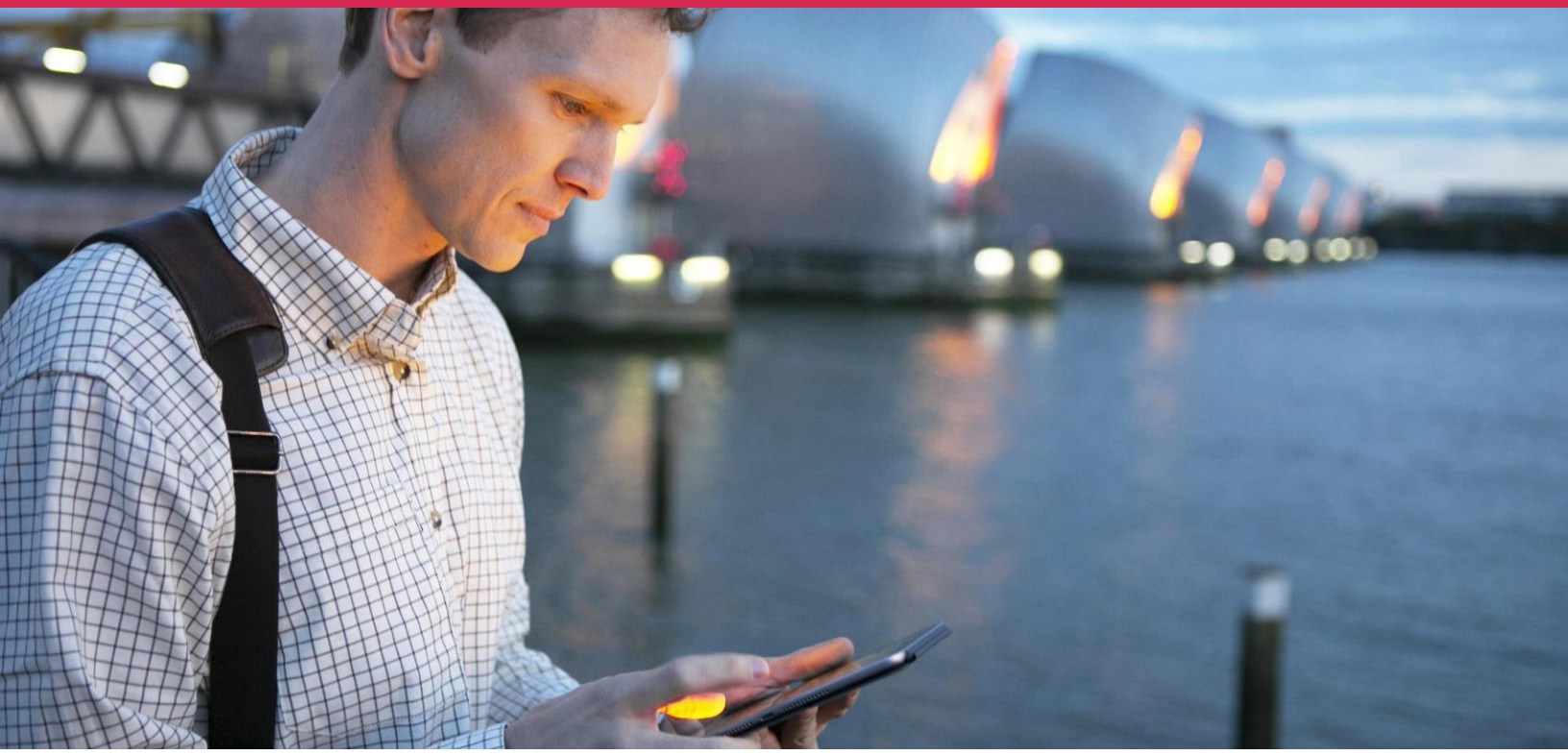
REFER WEBSITE

4. Integrity Hotline

REFER WEBSITE

Code of Conduct

Get answers. Ask before you act.



www.locusengg.com

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