

HAND IN HAND

Statement of Principles – Code of Conduct for Business Partners

Rooted in Iraq, Building for Generations.

IBN-YAKTEEN® LIMITED

Message from the Chief Executive Officer

To all our business partners and colleagues,

When we first started Ibn-Yakteen back in 2004, it was just a handful of people trying to get good work done, in a country where good work wasn't always rewarded. Over the years, we've grown and in what we expect of ourselves and the people we work with.

This document – our Code of Conduct for Business Partners – is for your clarity. It tells you, plainly and directly, what we expect from the people who work with us: honesty, safety, respect for others, and respect for the law. We've included real-world expectations around behaviour, documentation, subcontracting, and safety - not just what's on paper, but what actually happens on site.

we believe that the foundation of any business partnership is trust, whether you're a one-person crew or a long-established supplier. We know that trust doesn't come from words - it comes from how we act, especially when things get difficult. That's why this Code exists.

We know the gap between policies and practice can be wide, and sometimes forgotten, but we also believe that progress comes from setting a standard and holding the line, even if others don't. If you're reading this as a subcontractor, a vendor, or a service provider, we want to be clear: we welcome partnerships, but only with those who are willing to build with integrity.

I ask you to read this Code not as a legal formality, but as a commitment. We're not perfect, and we're not asking you to be. But we are asking for transparency, for care, and for responsibility to each other, to our workers, and to the people who trust us to build their homes, schools, clinics, and infrastructure.

We want long-term partners, not quick deals. We want to grow together, and to do that, we need to walk the same path.

With respect,

Mr. Adnan Oleiwi
Chief Executive Officer
Ibn-Yakteen LTD

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1. Preamble

At Ibn-Yakteen, we hold ourselves and our business partners to high standards of professionalism, integrity, and compliance. Our Statement of Principles outlines what we expect from all subcontractors, suppliers, vendors, and affiliates working with us across Iraq and beyond.

- This Code of Conduct is aligned with:
- The UN Universal Declaration of Human Rights
- The UN Global Compact 10 Principles
- The OECD Guidelines for Multinational Enterprises
- The ILO Core Labor Standards
- Applicable Iraqi labor, procurement, and health & safety laws

We encourage all partners to adopt these standards within their own organizations and supply chains. This Code applies to all categories of workers – permanent, temporary, subcontracted, or freelance – who are involved in Ibn-Yakteen's projects.

2. Integrity, Honesty and Ethical Conduct

All partners are expected to conduct business with integrity and transparency. Bribery, facilitation payments, collusion, or manipulation of bids are strictly prohibited.

We expect every individual working under your company, from management to laborers, to treat clients, officials, communities, and one another with honesty and respect.

3. Safety, Health and environmental protection

We maintain a "**zero major incident**" vision across all worksites. We require:

- Enforcement of safety gear (PPE), hazard markings, and safe work practices
- Clear safety induction for every worker, regardless of subcontractor tier
- Reporting of any injuries or near misses - immediately
- No tolerance for shortcuts that jeopardize safety or community welfare
- Respect for environmental regulations and minimal ecological harm

Partners who neglect safety risk not only termination of contract, but public accountability. This is not a soft policy, it's a non-negotiable clause.

If you are ever in doubt on how to approach things safely, please request a copy of our **copyrighted HSE (Health, Safety, and Environment) Manual**, which is registered with the Iraqi Ministry of Culture in 2020 and is a guide to HSE in our worksites. Every partner is expected to understand and implement what's in it fully. Unsafe behavior is not tolerated, no matter the excuse or the urgency of the task.

4. Fair labour and Inclusion

We do not tolerate child labor, forced labor, or unfair treatment of any worker. All workers must:

- Receive fair pay and rest time in line with Iraqi labor law
- Be treated with dignity - no harassment, coercion, or discrimination
- Have access to grievance channels without fear of retaliation
- Be hired through legal, transparent means

We actively welcome qualified small and medium enterprises (SMEs), women-led firms, and local businesses from underrepresented provinces.

We have shown our commitment to empowering SME in Muthanah and multiple other provinces as well, and we expect you walk this path.

4. Anti-Corruption and Conflict of Interest

Business partners must:

- Disclose any real or potential conflicts of interest
- Not offer, request, or accept bribes, kickbacks, or personal gifts
- Refrain from preferential treatment in hiring, procurement, or inspection
- Avoid any informal arrangements outside of approved contract terms

Any violation - regardless of perceived severity - will result in suspension of the partnership.

4. Documentation, Transparency, and Audits

Partners must maintain accurate records for accounting, safety, worker identity, inspections, and procurement logs.

Ibn-Yakteen reserves the right to:

- Request supporting documentation at any time
- Conduct periodic audits of supplier or subcontractor practices
- Require improvements in HSE, compliance, or reporting as needed

6. Community and cultural respect

We work across diverse Iraqi provinces and expect our partners to operate with sensitivity to local communities, tribal customs, and religious norms **without compromising law, safety, or human rights**.

7. Enforcement and sanctions

Ibn-Yakteen upholds full compliance with all Iraqi laws and regulations governing government contracts and public procurement. We are committed to ensuring that all reports, certifications, and communications submitted to government entities are accurate, complete, and transparent. Any deviations from contractual obligations must be formally reviewed and properly authorized through the appropriate channels.

8. Reporting and confidentiality

We want to assure you that we encourages responsible reporting of violations, with the promise of confidentiality and protection against retaliation. Reporting unethical behaviour can be done via:

ethics@ibn-yakteen.com

We take every report seriously.

9. Application of this Code

This Statement of Principles shall be shared with every approved vendor, subcontractor, or external partner. Acceptance of a contract or purchase order implies acceptance of this Code.

We invite business partners to include these principles in their own internal policies and onboarding materials.

10. Living the Code

These are not theoretical values. They are lived in the field. They shape who we work with and who we walk away from.

"We'd rather lose a subcontractor or a hiring client than lose our name"

- Mr. Luay Maryoosh, Chief Operating Officer