



GERAB NATIONAL ENTERPRISES L.L.C.

MAY 2025

CODE OF **BUSINESS CONDUCT**

YOUR BUSINESS. OUR COMMITMENT.

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FROM THE MANAGING DIRECTOR'S DESK

At Gerab National Enterprises LLC, we have built our reputation as a leading supplier of pipes and piping solutions by upholding the highest standards of integrity and ethical conduct. This commitment extends to every aspect of our business, from our interactions with colleagues and clients to how we source materials and conduct our operations.

Our core values, which go beyond mere words, serve as the foundation for our interactions with all stakeholders. Customer-centricity, teamwork, and service excellence guide us in building trust and long-lasting relationships. Additionally, individual integrity and ethics are fundamental to everything we do, forming the cornerstones of trust within our organization and extending outward to our suppliers, customers, and regulatory bodies.

This Code of Business Conduct serves as a roadmap, outlining expected behaviors that ensure we consistently act with integrity and ethical responsibility across all our businesses. It provides a clear framework for our employees, empowering them to make informed decisions that uphold the company's values and contribute to achieving our long-term vision.

I encourage every member of the Gerab team to embrace this code and actively integrate its principles into their daily work. By doing so, we can collectively ensure that Gerab continues to operate with the highest level of integrity and professionalism, solidifying our reputation as a trusted leader in the industry.

Abdullah Sharafi

Managing Director





Gerab's brand promise, '**Your Business: Our Commitment**,' is the foundation of our reputation and credibility. This commitment is deeply rooted in the unwavering dedication to delivering exceptional products and services, guided by Gerab's core values and upheld through the Code of Business Conduct encompassing:

BRAND PROMISE

**Your Business.
Our Commitment.**

VISION STATEMENT

**If it's a
Piping Solution,
we will
be there**

MISSION STATEMENT

**Passionately
building **relationships**,
cultivating **trust**,
and adding **value**.**



Honesty and Integrity

We conduct ourselves with uncompromising honesty and integrity in our dealings with all stakeholders.



Fairness and Respect

Our unwavering commitment is to treat all individuals with fairness, dignity, and respect, cultivating a trusting environment that is entirely free from harassment, bias, or discrimination.



Excellence and Professionalism

We steadfastly pursue excellence and professionalism in every facet of our work, both as individuals and as integral members of our teams.



GERAB VALUES

Being a part of Gerab demands not only the dedicated pursuit of our goals but also an unceasing endeavor to attain the objectives outlined in our strategic roadmap while unwaveringly adhering to our core values.

These values cultivate a culture of collaborative and respectful environment, leading to long term relationships and industrial leadership.



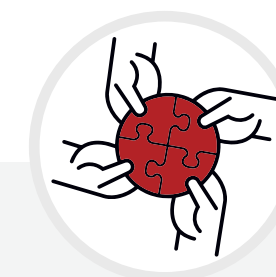
THINK CUSTOMER FIRST

We move with agility to ensure that our customers get excellent service consistently at every touchpoint.



GIVE AND EARN RESPECT

We engage with our colleagues and partners with integrity at our core, treating them with dignity, and respect.



WORK TOGETHER

We work cohesively as a team and consult to make win-win decisions.



TAKE OWNERSHIP

We proactively take personal ownership of tasks and commitments by being accountable for the quality and timeliness of our outcomes every time.



INNOVATE WITH SIMPLICITY

We continuously improve on what we do through creativity and by keeping things simple.



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STAKEHOLDER RELATIONS

Effective stakeholder engagement is essential for navigating challenges and achieving success in the dynamic business environment. At Gerab, we strive to cultivate strong relationships with stakeholders to ensure trust, credibility, and mutual success.

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CUSTOMER RELATIONSHIP

SUPPLIER RELATIONSHIP

DEALING WITH GOVERNMENT

INTERNATIONAL TRADE



CUSTOMER RELATIONSHIP

The success of the business relies on maintaining strong customer relationships in a competitive market, necessitating ethical practices to safeguard the company's reputation.

UNWAVERING COMMITMENT: UPHOLDING COMPLIANCE, CONFIDENTIALITY, AND ETHICAL CONDUCT

In the competitive business landscape, maintaining ethical standards is pivotal for sustained success. Gerab prioritizes adherence to laws, confidentiality, and ethical conduct. It is crucial to steer clear of any unethical actions, such as exploitation or cultural insensitivity, as Gerab strictly discourages such behaviors. Additionally, the company promotes ethical hospitality practices, encouraging a balanced approach and discouraging excessiveness.

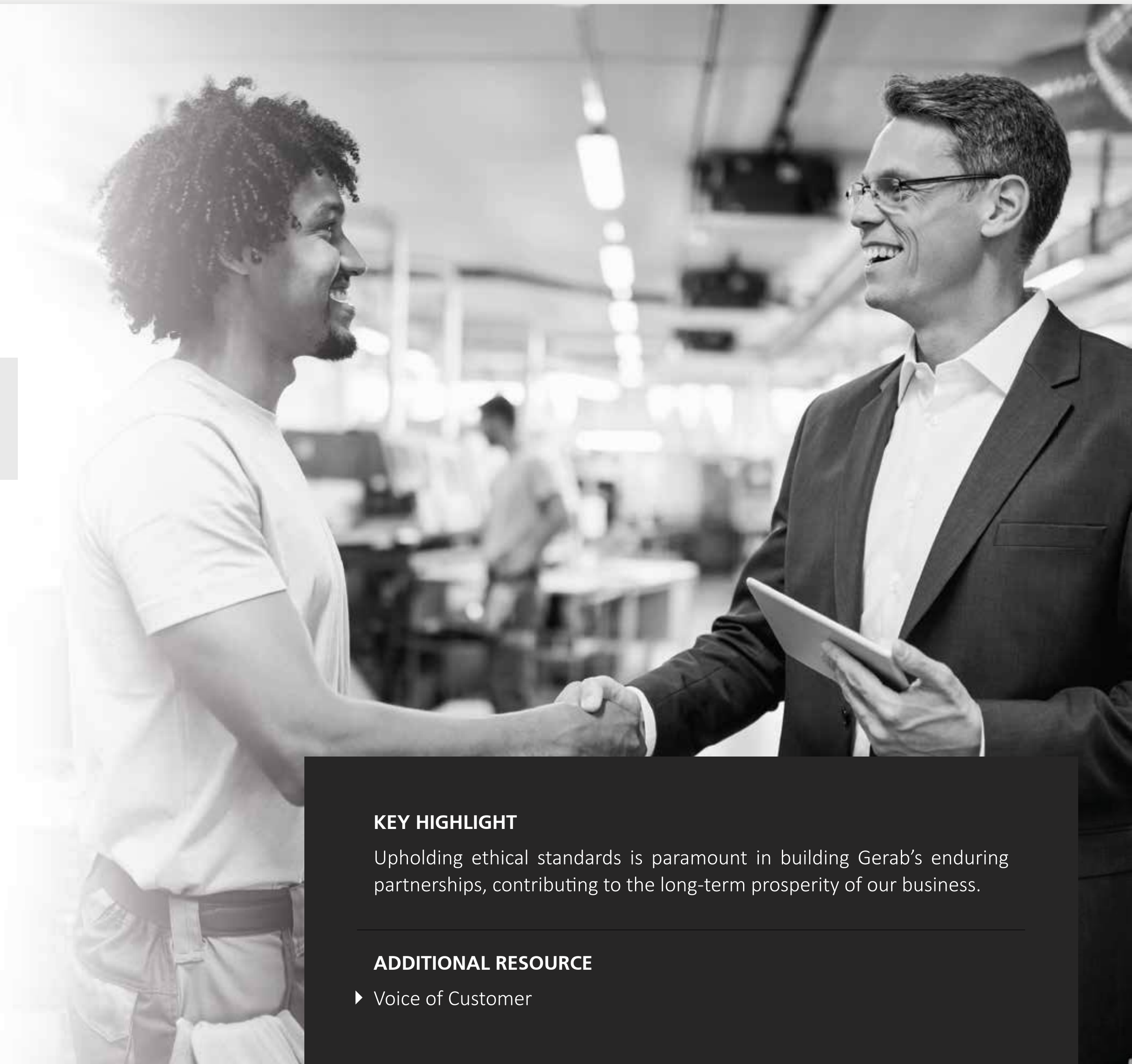
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[CUSTOMER RELATIONSHIP](#)

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KEY HIGHLIGHT

Upholding ethical standards is paramount in building Gerab's enduring partnerships, contributing to the long-term prosperity of our business.

ADDITIONAL RESOURCE

► [Voice of Customer](#)



SUPPLIER RELATIONSHIP

In the competitive market, the quality of the company's products and services is intricately tied to the products of our suppliers. Business prosperity relies on maintaining exceptional supplier relationships, emphasizing ethical practices to uphold our reputation and foster long-term partnerships."

LEGAL COMPLIANCE AND ETHICAL STANDARDS: UPHOLDING INTEGRITY IN BUSINESS CONDUCT

Gerab prioritizes legal compliance and ethical standards by adhering to both local and international laws. The company's commitment extends to prohibiting any unethical actions or behaviors in interactions with suppliers, ensuring a foundation of integrity and responsible business conduct.

STRATEGIC PARTNERSHIP AND ETHICAL ENGAGEMENT: FOSTERING COLLABORATIVE EXCELLENCE WITH SUPPLIERS

Gerab prioritizes quality, cost-effectiveness, and timely delivery in supplier relations, aligning with ethical standards. This commitment extends to hospitality and gift policies, which emphasize ethical practices and mutual benefit.

INTEGRITY IN OPERATIONS: ENSURING COMPREHENSIVE DATA PROTECTION AND NON-DISCLOSURE

Gerab ensures data security through robust non-disclosure agreements while prioritizing transparent communication, trust-building, and supplier performance. Adherence to the Conflict-of-Interest Policy reflects our commitment to operational integrity.

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CUSTOMER RELATIONSHIP

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KEY HIGHLIGHT

Fostering robust supplier relationships, adhering to legal and ethical standards, and forming strategic partnerships are pivotal in ensuring Gerab's operational integrity and long-term business prosperity.



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DEALING WITH GOVERNMENT

Gerab ensures strict compliance with laws in government contracts and emphasizes honesty in all interactions with the government and customers.

GOVERNANCE AND COMPLIANCE DIRECTIVES: ENSURING ETHICAL BUSINESS PRACTICES

Gerab upholds truthfulness and accuracy in dealings, exercising due diligence in selecting third parties. The company ensures authenticity in reports to government agencies, maintains transparency in dealings, and discloses conflicts of interest as per the Conflict of Interest Policy.

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INTERNATIONAL TRADE

KEY HIGHLIGHT

Guided by strict principles, Gerab maintains unwavering integrity in government interactions by strictly adhering to regulations, refraining from inducements, ensuring honesty, and fostering trust through transparency





INTERNATIONAL TRADE

Gerab complies with international trade controls imposed by host countries for national security, economic well-being, and foreign policy, aligning with both local and international protocols.

INTERNATIONAL TRADE COMPLIANCE: ADHERING TO LEGAL STANDARDS

Gerab ensures compliance with country-specific laws, abstains from prohibited international transactions, and adheres to local regulations when engaging in international trade. The company follows international trade control regulations, including documentation, reporting, and record retention. Gerab avoids involvement in restrictive trade practices under applicable laws, maintains transparency, discloses conflicts of interest, upholds human rights, and minimizes environmental impact, adhering to relevant laws and regulations.

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CUSTOMER RELATIONSHIP

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INTERNATIONAL TRADE

KEY HIGHLIGHT

Adhering to legal requirements and ethical standards is imperative for Gerab. This ensures transparency, respect for human rights, and minimization of environmental impact in all global trade activities, fostering sustained business prosperity.



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ETHICAL WORKPLACE AND PRACTICES

Gerab prioritizes ethical behavior, which forms the foundation for a healthy, inclusive, and productive work environment. This positively impacts employee satisfaction, organizational reputation, and overall success.

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EQUAL EMPLOYMENT OPPORTUNITY

OFFICE CONDUCT

CONFLICT OF INTEREST

POSH



EQUAL EMPLOYMENT OPPORTUNITY

Promoting equal opportunity and fair treatment for all based on merit, Gerab upholds the right of every individual to be treated with dignity, and all employees are obliged not to breach this policy.

EQUAL OPPORTUNITY AND INCLUSION

Gerab commits to equal opportunity and fair treatment, recruiting, hiring, and promoting without regard to protected characteristics. Staffing prioritizes diverse qualified candidates, ensuring merit-based selection. The company maintains a harassment-free workplace and handles complaints through established procedures. Fair performance appraisals and compliance with local labor laws are guaranteed. Gerab strictly prohibits human trafficking-related activities and adheres to local and international equal employment opportunity laws. Striving for workplace diversity, Gerab actively recruits and retains individuals from various groups, expecting every employee's contribution to foster inclusivity and equal treatment.

KEY HIGHLIGHT

Gerab prioritizes equal opportunity and fair treatment for all employees, ensuring respect, dignity, and merit-based practices in recruitment, promotion, and workplace conduct. Additionally, the company strives to create a diverse and inclusive environment.

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EQUAL EMPLOYMENT OPPORTUNITY

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OFFICE CONDUCT

Gerab cultivates a work environment characterized by professionalism, respect, and a positive atmosphere. It is imperative that all Gerab employees actively adhere to strict compliance with the HR policies and the Code of Business Conduct Policy. This ensures a harmonious and thriving work atmosphere, promoting a workplace culture that values integrity, cooperation, and mutual respect.

KEY HIGHLIGHT

Gerab's policies and guidelines are instrumental in upholding the highest standards of integrity, contributing to Gerab's core values.

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EQUAL EMPLOYMENT OPPORTUNITY

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CONFLICT OF INTEREST

Gerab establishes guidelines for employees, contractors, and third-party entities, ensuring that their actions align solely with the organization's best interests. The company mandates full-time commitment, prohibiting gainful employment or conflicting arrangements.

CONFLICT OF INTEREST COMPLIANCE

Gerab strictly adheres to all relevant laws and regulations concerning conflicts of interest. The company employs robust checks to monitor compliance with its conflict-of-interest policies, swiftly addressing any identified deficiencies.

PROHIBITION OF CONFLICTING ACTIVITIES

Activities creating conflicts of interest, such as accepting gifts or engaging in conflicting employment, are strictly prohibited. Any potential conflict activities must be disclosed, and approval must be sought from a designated authority within the organization.

GUIDANCE ON RECUSAL

Clear guidance is provided on when and how employees should excuse themselves from decision-making processes or activities involving conflicts of interest. The company assures employees reporting conflicts of interest protection from retaliation and provides avenues for anonymous reporting.

ENFORCEMENT MEASURES

Mechanisms for monitoring compliance and enforcing measures for non-compliance are in place, emphasizing strict consequences, including severe disciplinary actions.

KEY HIGHLIGHT

Gerab ensures that actions align with the organization's best interests by emphasizing full-time commitment, prohibiting conflicting engagements, and requiring approval for exceptions.

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EQUAL EMPLOYMENT OPPORTUNITY

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POSH

POLICY FOR PREVENTION, PROHIBITION, AND REDRESSAL OF SEXUAL HARASSMENT OF EMPLOYEES AT WORKPLACE

Ensuring a work environment conducive to fair, safe, and harmonious relations, based on mutual trust and respect, is vital. Gerab is committed to conducting and governing the company with ethics, transparency, and accountability. To this end, Gerab has developed governance structures, practices, and procedures to promote ethical conduct across all levels of the value chain.

The company also strives to guarantee a safe and welcoming environment to all those who visit any of Gerab's locations in any capacity, such as customers, vendors, etc. Discrimination and harassment of any type is strictly prohibited. Gerab wishes to promote and maintain this culture to ensure that associates of the company do not engage in practices that are abusive in any form or manner.

Furthermore, the company is dedicated to maintaining a safe working environment and strictly prohibits all forms of sexual harassment. Any act or retaliation related to sexual harassment is deemed unacceptable. Gerab's policy explicitly prohibits such behavior and outlines the procedures to follow if an associate believes a violation has occurred, adhering to all applicable regulations on sexual harassment.

KEY HIGHLIGHT

Ensuring a secure environment fostering mutual trust and respect, and free from discrimination and abusive practices, Gerab maintains a steadfast commitment to ethical conduct, transparency, and accountability, unequivocally prohibiting sexual harassment in the workplace.

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EQUAL EMPLOYMENT OPPORTUNITY
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COMMUNICATION, DATA, AND INFORMATION SECURITY

At Gerab, we recognize the importance of data and information security in ensuring business continuity, fostering customer trust, and complying with regulatory standards. We are firmly committed to safeguarding all information entrusted to us. This commitment extends to protecting various categories of data, including company information concerning our products, customers, partners, internal operations, and personal data belonging to employees and customers.

Additionally, we prioritize the protection of our Intellectual Property, encompassing trademarks, research findings, products, and other confidential information developed by Gerab employees.

To ensure effective data protection, we have established different protocols.

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INFORMATION SECURITY PROTOCOLS

PRIVACY MANAGEMENT AND MEDIA RELATIONS

KEY HIGHLIGHT

Data and information security are imperative for the business, as they protect against unauthorized access, preserve customer trust, and ensure compliance with regulations.

ADDITIONAL RESOURCE

- [Communication, Data, and Information Security Policy](#)



Information Security Protocols

DATA CLASSIFICATION AND ACCESS CONTROLS

We implement strict data classification procedures to categorize information based on its sensitivity. This allows for appropriate access controls, ensuring that only authorized personnel can access specific data types.

EXTERNAL COMMUNICATION

Gerab and its employees adhere to clear communication protocols when interacting with external parties to ensure the accuracy and completeness of information shared with clients, suppliers, and partners.

INTELLECTUAL PROPERTY PROTECTION

Gerab recognizes the value of its Intellectual Property (IP) and takes active measures to protect it. This includes:

- Effective data management practices that prevent unauthorized copying of sensitive information by external entities.
- Training for our employees to understand and value Gerab's IP, ensuring responsible handling and preventing infringements.
- Handling trademark registrations by Gerab's Marketing and Legal Departments to ensure legal protection

ELECTRONIC DATA AND COMMUNICATION

Gerab employees must use digital communication channels responsibly and adhere to specific protocols for secure transmission. This includes:

- Following IT guidelines for secure communication.
- Utilizing designated secure channels for official correspondence.
- Avoiding sharing sensitive data through unsecured means.
- Encrypting confidential emails and implementing file passwords.
- Following IT standards and using Gerab's secure electronic channels for all official communication, especially emails.

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INFORMATION SECURITY PROTOCOLS

PRIVACY MANAGEMENT AND MEDIA RELATIONS



KEY HIGHLIGHT

By proactively protecting these valuable assets, Gerab demonstrates its commitment to responsible data management and builds trust with all of its stakeholders.



Privacy Management and Media Relations

PERSONAL & CONFIDENTIAL DATA PROTECTION

Gerab upholds the highest standards for personal data protection, ensuring compliance with relevant regulations. This includes:

- Employees are trained to identify and classify personal data, ensuring it is only collected with proper consent following established procedures.
- Confidential data is handled with the utmost care, its access is restricted to authorized personnel, and any unauthorized use or disclosure may result in disciplinary action.
- We maintain secure storage for confidential data and require prompt reporting of security incidents.

MEDIA ENQUIRIES AND SOCIAL MEDIA

- All business inquiries regarding Gerab's activities are directed and responded to by Gerab's Marketing Department.
- Employees are not authorized to act as spokespersons, and non-compliance with this policy may result in disciplinary action.
- Employees are prohibited from using social media on company devices during work hours for personal use. Sharing confidential information or making derogatory remarks on social media is strictly forbidden and may result in disciplinary action.

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INFORMATION SECURITY PROTOCOLS

PRIVACY MANAGEMENT AND MEDIA RELATIONS

KEY HIGHLIGHT

By adhering to these protocols and fostering a culture of data security awareness, Gerab maintains its commitment to ethical and responsible business practices, ensuring the protection of the information entrusted to us.





ENVIRONMENT, HEALTH & SAFETY

Amid challenges of declining resources, Gerab is dedicated to environmentally responsible practices, recognizing the critical juncture we face. This commitment extends to providing a safe and healthy environment and meeting statutory requirements for environmental, health, and safety standards.

IN ENVIRONMENTAL STEWARDSHIP: MAKING RESPONSIBLE CHOICES

Gerab prioritizes environmentally responsible practices, complies with global environmental standards, ensures energy efficiency, and minimizes harm through waste reduction. Committed to safety, the company adheres to local and international laws governing health, safety, and the environment, maintaining transparency, and collaborating with local communities.

KEY HIGHLIGHT

Gerab prioritizes environmental responsibility by adhering to global management principles, continuously improving standards, ensuring legal compliance, and prioritizing the safety of all stakeholders.

ADDITIONAL RESOURCE

- Environment, Health, and Safety Policy Manual



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FINANCIAL INTEGRITY

Gerab adheres to globally recognized accounting principles, standards, laws, regulations, and practices governing accounting, auditing, and financial reporting. This commitment extends to financial controls and records, ensuring compliance with international standards throughout the accounting and financial reporting processes.

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FINANCIAL CONTROLS & RECORDS

ANTI-FRAUD POLICY

ANTI-BRIBERY & CORRUPT PRACTICES

ANTI-MONEY LAUNDERING





FINANCIAL CONTROLS & RECORDS

Gerab ensures a robust framework for transparent, accurate, and legally compliant financial transactions. Aligned with international standards, the policy fosters accountability and compliance, and non-compliance may result in disciplinary actions.

FINANCIAL CONTROLS: ADHERING TO GLOBAL STANDARDS

Finance and Accounting follow globally recognized principles and regulations. The Delegation of Authority outlines transaction approvals, and processes ensure accurate financial reporting. Priorities include maintaining complete records, conducting credit assessments, and adhering to legal compliance. External sharing requires approval from the Managing Director and Board. Regular audits by Gerab's Audit and Assurance team ensure accuracy. Non-compliance results in swift disciplinary actions.

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FINANCIAL CONTROLS & RECORDS

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ANTI-MONEY LAUNDERING

KEY HIGHLIGHT

Gerab's Finance and Accounting department ensures compliance with global standards, promoting transparency, robust controls, and accountability to maintain operational integrity





ANTI-FRAUD POLICY

Fraud undermines the stakeholders' trust and threatens the business' integrity. Gerab is dedicated to upholding the highest ethical standards in its operations, guided by international norms.

Fraud activities may include:

- misappropriation of assets
- financial misrepresentation
- corruption
- bribery
- and any form of dishonest or unethical conduct

FRAUD PREVENTION AND DETECTION: SAFEGUARDING INTEGRITY AND COMPLIANCE

To mitigate fraud risks and ensure compliance with applicable laws, Gerab conducts regular risk assessments, implements internal controls, and monitors changes in the business environment. Reporting mechanisms, employee training, and the Whistleblower Policy enhance fraud prevention and detection. Individuals reporting misconduct will be protected from retaliation and thorough investigations and disciplinary actions, including legal measures, will be taken for substantiated incidents. Gerab commits to cooperating with authorities for fraud prosecution, providing full support for justice.

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FINANCIAL CONTROLS & RECORDS

ANTI-FRAUD POLICY

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KEY HIGHLIGHT

Gerab prioritizes ethical conduct and fraud prevention through ongoing risk assessments, internal controls, comprehensive training, and a robust reporting system. This facilitates swift investigations and collaboration with authorities to maintain integrity.



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ANTI-BRIBERY AND CORRUPT PRACTICES

Gerab adheres to the highest ethical standards, prohibiting bribery, improper payments, and unethical practices. This commitment is rooted in conducting business ethically, maintaining transparency, and strictly adhering to international standards. The company's Anti-Bribery and Corruption Policy reinforces its dedication to compliance with global norms, ensuring ethical business conduct.

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FINANCIAL CONTROLS & RECORDS

ANTI-FRAUD POLICY

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ANTI-MONEY LAUNDERING

KEY HIGHLIGHT

Gerab and its employees act with the highest degree of integrity, honesty, and accountability at all times.



ANTI-MONEY LAUNDERING

Gerab acknowledges the international nature of Anti Money Laundering (AML) and Counter-Terrorism Financing (CTF) issues and is committed to upholding the highest global standards in preventing and detecting money laundering and terrorist financing by complying with all applicable laws and regulations worldwide.

GERAB IN ACTION:

How does Gerab identify and mitigate potential risks associated with money laundering?

- Regular Risk Assessments
- Continuous Evaluation of Business Operations
- Periodic Training
- Awareness Programs
- Whistleblower

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FINANCIAL CONTROLS & RECORDS

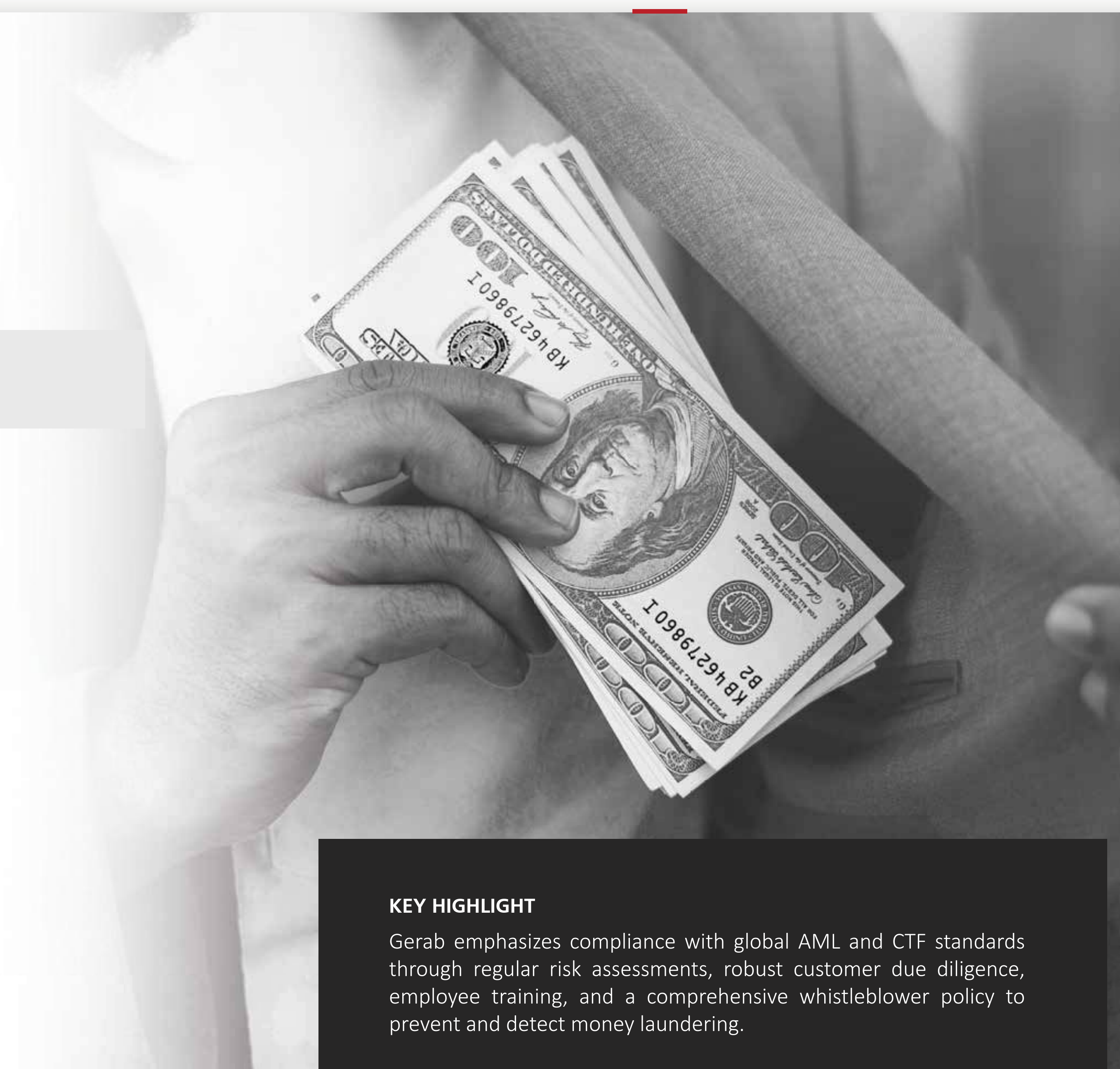
ANTI-FRAUD POLICY

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ANTI-MONEY LAUNDERING

KEY HIGHLIGHT

Gerab emphasizes compliance with global AML and CTF standards through regular risk assessments, robust customer due diligence, employee training, and a comprehensive whistleblower policy to prevent and detect money laundering.





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KHIDMATI

Centered around Gerab's brand promise, "Your Business: Our Commitment," the company's dedication to sustainability is driven by concern for its staff, society, and the environment, tightly interwoven with Gerab's core business strategy. The corporate culture and values of Gerab are rooted in service, respect, and personal ownership of actions, outcomes, and reputation.

The Khidmati Charter helps Gerab focus on the three key subsets of its ecosystem:

EMPLOYEES

Gerab prioritizes human rights and diversity, fostering a safe and discrimination-free workplace.

SOCIETY

Gerab conducts lawful and neutral relations with authorities, respects local cultures, contributes to society, collaborates with NGOs, and maintains transparent communication with stakeholders for timely and accurate information about its Khidmati activities.

ENVIRONMENT

Gerab is dedicated to environmental protection through eco-friendly practices, sustainable sourcing, and green operations aimed at reducing waste, energy, and water impact annually, achieving zero waste to landfill and adopting sustainable packaging.





YOUR VOICE MATTERS

At Gerab, we embody a culture of ownership and unwavering integrity, extending our commitment to external stakeholders. Central to our values, ownership drives us to proactively address challenges and improve continuously. We hold ourselves to the highest standards of integrity, encouraging external parties to speak up if they observe any misalignment with our values or Code. We understand decision-making complexities but urge open communication for transparency and accountability. Join us in fostering a culture of trust, collaboration, and continuous improvement for the enduring success of Gerab.

WHISTLEBLOWER

Gerab's Whistleblower Policy encourages employees, vendors, and customers to promptly report any suspected or actual instances of illegal, unauthorized, or unethical conduct, including fraud, corruption, or safety concerns. This initiative ensures swift corrective actions are taken to address issues and hold responsible individuals accountable. The Whistleblowing process prioritizes the protection of individuals acting in good faith, allowing them to report misconduct without fear of retaliation.

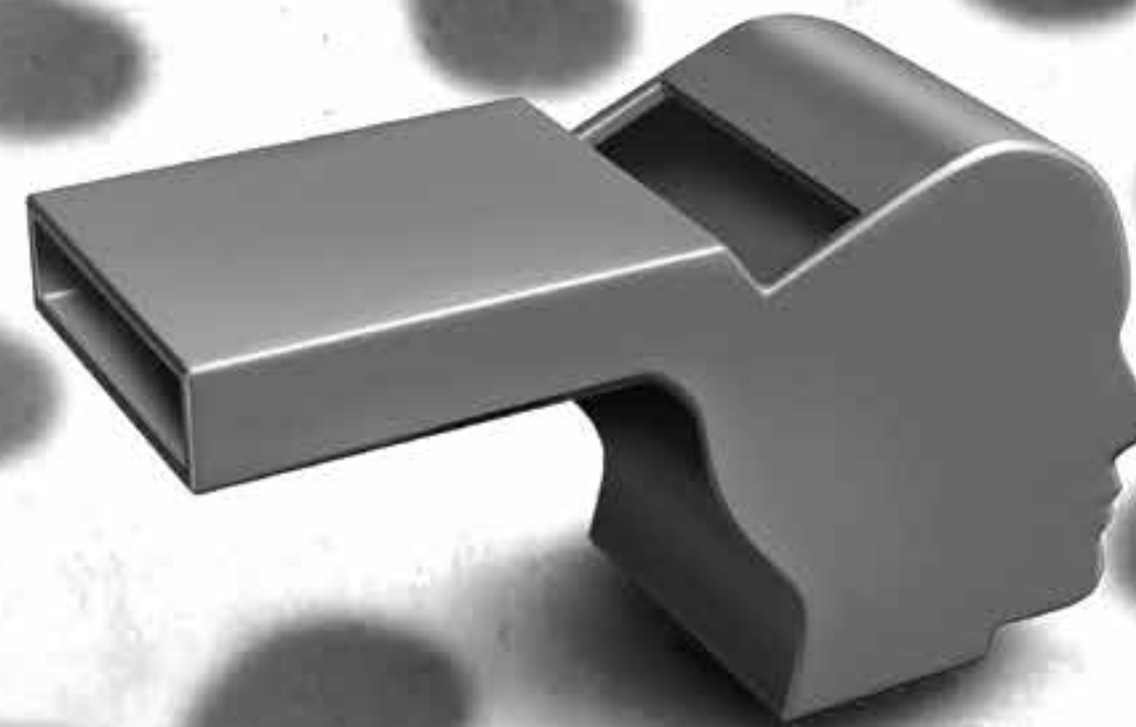
HOW TO RAISE A CONCERN

Gerab prioritizes stakeholder relations through ethical business practices, legal compliance, and transparency, while also ensuring environmental responsibility by aligning operational activities with societal and environmental benefits and promoting sustainable practices.

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WHISTLEBLOWER

SPEAK UP! HOW TO REPORT



ADDITIONAL RESOURCE

► Whistleblower Policy



What Happens When You Report?

Gerab prioritizes ethical conduct through the Whistleblower Policy, thus reporting any matter triggers a swift and confidential investigation, shielded from retaliation, by the designated Investigator. Whistleblowers can use various reporting channels, ensuring flexibility. The process prioritizes protecting the whistleblower's identity and aims for prompt, thorough investigations. If wrongdoing is found, corrective action, including disciplinary measures, is taken swiftly. Robust record-keeping ensures compliance with legal standards, and findings are reported to senior management for policy enhancements, showcasing Gerab's dedication to transparency, accountability, and ethical practices.

Gerab takes all concerns seriously and has established a thorough and independent investigation process. All Gerab employees must cooperate with and provide relevant information when requested. The more detail you provide, the easier it will be to assess the problem, take action, and find a solution.

SPEAK UP!

How to Report

You can raise questions or report your concerns in many ways:

- To a Department Head
- To an HR Representative
- To the Group Chief HR Officer
- To the Whistleblower Committee (**Investigator@gerab.com** or to the **locally designated Dropbox**, anonymously or under your name)

Choose the reporting option you are most comfortable with. Whichever option you choose, your confidentiality will remain a priority. Gerab will only disclose information about your report if necessary to conduct and conclude the investigation.

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WHISTLEBLOWER

SPEAK UP! HOW TO REPORT



