

C.A.T.
Code of Ethics & Business Conduct





A WORD FROM OUR CEO

Since our first projects in 1937, C.A.T. has grown from a local contractor into a trusted regional and international partner. Our history has been shaped by more than structures and scale. It has been shaped by choices. Decade after decade, across shifting markets, technologies, and geographies, one constant has defined us. Our determination to do what is right in all our business.

Our reputation has not been inherited. It has been engineered patiently, project by project and relationship by relationship, until the name C.A.T. has become synonymous with reliability, technical excellence, and trust. This reputation is not an abstract idea. It is a living asset. It is built daily through conduct, decisions, and the standards we refuse to compromise.

At C.A.T., we understand that reputation is a form of capital that compounds across generations. Protecting it is therefore not the responsibility of leadership alone, but a collective custodianship shared by every member of the C.A.T. Family. The Code of Ethics & Business Conduct, as provided in this document, exists to translate that custodianship into daily practice. It unifies our principles into a single, clear governance framework, and provides practical direction to help each of us act with sound judgment, professional discipline, and moral clarity.

Our three core values of Commitment, Agility, and Trust are not aspirational slogans. They are operating systems for how we build, lead, and serve.

Commitment reflects our obligation to culture, legacy and impact. It means we do not compromise on integrity, safety, or quality, even under pressure. It means we build beyond today, considering not only immediate outcomes, but the durability, value, and social imprint of what we leave behind.

Agility reflects our capacity to adapt with discipline. We evolve with changing markets, regulations, and technologies without abandoning our principles or standards. We move with speed where required, and with precision where it matters most. We learn relentlessly, converting experience into advantage and progress into endurance.

Trust reflects our most valuable currency. It is built through transparency, earned through consistency, and sustained through performance. It requires the courage to speak up, the protection of those who raise concerns in good faith, and the humility to be held accountable. Trust, for us, is not promised. It is proven.

These values form the foundation of our shared culture and ensure that ethical behaviour remains inseparable from high performance. They bind Executive Management to project sites,

strategy to execution, and authority to accountability.

I ask each of you to read this Code carefully and understand how it applies to your everyday work. Each decision you make, each conversation you hold, each action you take contributes directly to the moral architecture of our organisation. In this sense, every role at C.A.T. is a promise kept to quality, to progress, and to one another.

By renewing our collective commitment to this Code, we ensure that the confidence of our clients, partners, employees, and communities remains strong and justified. I take personal responsibility for ensuring that both I, and the senior leadership team and all our employees, are fully accountable to these standards of behaviour.

Our legacy since 1937 belongs to all of us. So does our future. By living this Code with discipline, humility, and courage, we safeguard our good name, strengthen our relationships, and ensure that C.A.T. continues to be recognised not only as a preferred partner of choice, but as a responsible corporate citizen trusted by generations.

Christopher R. Bush
Chief Executive Officer

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1. Objective

C.A.T.* sets this Code of Ethics & Business Conduct “The Code” with a clear purpose: to foster ethics, honesty, and professionalism among employees and business partners.

C.A.T.’s commitment is unwavering to conducting business in a manner that is not only legal but also safe, ethical, environmentally conscious, and socially responsible.

As an integrated organisation, every action taken by the employees and business partners echoes throughout the Company, impacting our collective reputation. Therefore, we expect all individuals associated with C.A.T. to adhere to this Code as well as to any contractual requirements set forth by our clients. By doing so, the Company upholds public trust and ensures the sustainable growth and development of C.A.T.

To disseminate this commitment effectively, C.A.T. ensures:

- Transparency
This Code of Ethics & Business Conduct is publicly accessible in the Company offices and on our website www.cat.me
- Communication
All stakeholders within our ecosystem, whether employees, partners, suppliers and/or subcontractors, will be informed of and understand the principles outlined in this Code.
- Integration
These principles will be explicitly incorporated into all business relationship documents with C.A.T.’s suppliers, subcontractors and service providers.

2. Commitment to Ethical & Professional Behaviour

All employees of C.A.T., including senior management, are required to read, understand and apply this Code, and conduct business in accordance with the applicable laws, policies, and procedures of C.A.T., C.A.T. contracts with its clients, its consortiums, joint ventures, and any other form of partnership. In case of ambiguity between the codes of the formers, the strictest code shall apply. Employees shall exercise sound judgment, perform duties diligently, and uphold ethical standards.

2.1 ETHICAL BEHAVIOUR

Managerial Responsibilities: Ethical Leadership

Managers play a crucial role in upholding ethical standards within the organisation. Their responsibilities include:

- Clarifying Responsibilities
Ensuring that their team members understand their obligations under the Code and other Company policies.
- Creating an Open Environment
Fostering a workplace where ethical concerns can be openly discussed and addressed.
- Evaluating and Reporting
Considering employee conduct with respect to the Code and other policies during performance evaluations; reporting any violations of Company policies, applicable laws, or instances of moral wrongdoing.
- Fostering / Modelling Ethical Leadership
Refraining from compromising ethical behaviour for business outcomes; personally, committing to the highest standards of ethical conduct, setting an example for others.

Commitment to Ethical and Fair Competition

C.A.T. upholds the principles of fair competition and integrity and explicitly rejects any illegal methods of gathering information about competitors and clients.

2.2 PROFESSIONAL BEHAVIOUR

Emphasis is placed on courteous and respectful conduct among employees, business partners, and all individuals with whom C.A.T. maintains professional relationships. C.A.T.’s commitment extends to fostering a positive working atmosphere, free from negativity.

Guidelines for Professional behaviour

Timely and Discrete Handling

- Address internal and external requests or issues promptly, efficiently, and discretely.
- Swiftly resolve complaints in a fair and reasonable manner.

Punctuality

- Maintain punctuality during meetings.

Client Satisfaction

- Consistently strive to deliver value and uphold rigorous standards.
- Provide clear and accurate information.
- Avoid pressuring or misleading clients into hasty decisions and refrain from unethical approaches.

* Any reference to “C.A.T.” or “Company” in this document means any and all of the following entities: C.A.T. International L.L.C. (KSA), C.A.T. International Limited L.L.C. (UAE), C.A.T. International Qatar W.L.L., C.A.T. Contracting and Trading W.L.L. (QAT), Contracting and Trading Company “C.A.T.” – Lebanon S.A.L., C.A.T. Offshore S.A.L. (LBN).

2.3 COMPLIANCE WITH LAWS, CODES, & REGULATIONS

Employee Responsibilities

All C.A.T. employees shall adhere to Company regulations, applicable laws, and client contractual requirements across all areas of C.A.T.'s operations.

Employees with ethical and/or legal inquiries are encouraged to consult with their Division/Department Head or C.A.T.'s Legal department.

Ethical conduct is mandatory, and employees must avoid any actions that could lead to a conflict of interest and/or impact the job performance.

Fraud Awareness

- Employees within C.A.T. should be vigilant regarding types of fraud and recognize associated indicators.
- Fraudulent misconduct includes misrepresentation, concealment of material facts, and failure to fulfil responsibilities, resulting in loss and/or misuse of Company assets.

Business Partners Obligations

C.A.T. Business Partners, including suppliers and subcontractors, shall be formally notified of this Code and are requested to comply fully with its provisions, as well as with all applicable laws, codes, and regulations.

Client contractual requirements outlined in bids and agreements (including proposals, invitations to bid, solicitations, and resulting contractual) are binding.

3. Dedication to Ethical Business Practices

C.A.T. rigorous ethical standards extend to fair trade practices, responsible sourcing, and transparent interactions.

3.1 FAIR TRADE PRACTICES

C.A.T. shall, and its business partners should, exert every effort to strictly avoid collusive bidding, anticompetitive behaviour, and any unfair trade practices.

3.2 ETHICAL SOURCING

C.A.T. and its business partners shall source goods or services from third parties that meet minimum standards for health and safety, working conditions, pay, and environmental protection, and foremost from a country free of any international sanctions.

3.3 GIFTS, GRATUITIES, & HOSPITALITY

C.A.T. employees shall refrain from accepting or giving any form of gifts, gratuities or hospitality, that could influence professional relationships.

Accepting gifts, entertainment, and other business courtesies from a competitor or business partner can easily create the appearance of a conflict of interest, which could undermine the integrity of C.A.T.'s professional relationships and compromise ethical standards. Acceptance of inexpensive "token" non-cash gifts as defined below is permissible upon approval of concerned direct manager or after seeking the Director of Corporate Governance and/or Group Manager: Human Resources feedback or approval.

Accepting gifts, entertainment, travel, accommodation, or any other form of hospitality from these entities can create a perception of bias or undue influence, which is detrimental to our commitment to impartiality and fairness. This prohibition extends to all employees and their family members, ensuring that no personal expenses, including travel, accommodation, or other associated costs, are reimbursed by competitors or business partners.

The only exception to this rule is the acceptance of inexpensive, token non-cash gifts, provided they do not exceed one-hundred US dollars (\$100) and comply with C.A.T. policies. Even in such cases, employees must exercise caution and consider whether the acceptance of such gifts could be perceived as inappropriate and/or compromising under local laws, practices or customs, and if to do so, should be in alignment with their concerned direct manager or Director of Corporate Governance and/or Group Manager: Human Resources for feedback or approval.

By adhering to this policy, C.A.T. upholds the highest standards of ethical conduct and ensures that all business decisions are made solely in the best interest of C.A.T., free from any external influence and/or bias. This commitment to integrity is fundamental to maintaining the trust and confidence of C.A.T.'s clients, partners, and stakeholders.

3.4 CLIENTS AND GOVERNMENT OFFICIALS

In accordance with applicable regulations, employees and third parties acting on behalf of the Company must not promise, offer, or provide money or anything of value to a client's representative and/or government official with the intent to improperly influence their decisions or actions. This includes actions intended to induce an official to act contrary to their lawful duties or to misuse their position.

For clarity, a government official includes, but is not limited to:

- Any officer or employee of a government or any department, agency, or instrumentality thereof (including government-owned or government-controlled entities)
- Any person acting in an official capacity on behalf of a government entity
- Political party officials, candidates for political office, and officials of public international organizations

While certain payments to government officials - such as customs duties, visa fees, or fast-track processing charges - may occur in the normal course of business, these must always be expressly lawful, clearly documented, and transparent. Any such payments must be made through official channels and supported by receipts or other proper documentation.

Any payment or gift including, but not limited to, direct payments, gifts, entertainment expenses, or contributions is prohibited.

Transparency is crucial; any potential misinterpretation shall be avoided.

3.5 ANTI-BRIBERY

Bribes are strictly prohibited in dealings with any public or private parties. Bribes can take many forms, such as cash, gifts, travel, entertainment, below-market discounts, favours, career or business opportunities, donations, intended to influence a decision or gain improper advantage.

Examples include attempts to secure business contracts or to influence government decisions, audits, inspections, or legislation.

3.6 IMPROPER PAYMENTS BY THIRD PARTIES

Vigilance is necessary when evaluating third parties (agents, consultants, mediators, etc) interacting with government officials on behalf of C.A.T.

All agents and consultants must adhere to C.A.T.'s Code of Ethics & Business Conduct, which shall be included by reference in their respective agreements with C.A.T.

3.7 ANTI-MONEY LAUNDERING

C.A.T. adheres to Anti-Money Laundering (AML) laws, rules, regulations, international treaties and export controls in all jurisdictions in which it operates.

Suspicious transactions or money laundering concerns shall be promptly reported to C.A.T. Management, as per the Whistleblowing policy & procedure [DP-HR-120] via code@cat.me.

C.A.T.'s commitment to ethical conduct ensures the integrity and success of the entire C.A.T. organisation.

4. Valuing & Safeguarding Relationships

C.A.T. recognises the critical importance of maintaining strong relationships across various stakeholders. C.A.T.'s commitment extends to clients, business partners, governments, and C.A.T.'s own employees.

4.1 WITH OUR CLIENTS

C.A.T.'s primary objective is to be the preferred contractor for its clients.

C.A.T. aims at delivering services that meet client's full satisfaction, emphasizing safety, quality, and trust.

As an extension of client's operations, C.A.T. safeguards their interests in alignment with the client's corporate strategies and ethical guidelines.

4.2 WITH OUR BUSINESS PARTNERS

Trust, transparency and clear communication underpins C.A.T.'s relationship with its business partners. Fair, honest and integrity-driven transactions are essential.

4.3 WITH OUR GOVERNMENTS

Interactions with government officials follow distinct legal rules.

C.A.T. strictly refrain from offering anything, directly or indirectly, to influence favourable treatment.

4.4 WITH OUR EMPLOYEES

Creating and maintaining an engaging work environment is C.A.T.'s responsibility.

Employee dignity is a Companywide priority. As C.A.T., we are committed to treating every individual with respect, fairness, and courtesy. We foster a workplace where all employees feel valued, supported, and empowered to contribute their best work without fear of discrimination or harassment.

Diversity and Employment Practices

C.A.T., as an Employer of Choice, is dedicated to attracting and acquiring talented candidates through a fair, efficient recruitment process.

Equal opportunities for employment are provided regardless of gender, marital status, disability, race, or belief.

C.A.T. is committed to the conventions set out by the International Labour Organisation (ILO) and adheres to the United Nations Guiding Principles on Business and Human Rights. C.A.T. respects and protects individual human rights and complies with the employment laws in every location in which it operates. C.A.T. does not tolerate slavery, forced labour, child labour, commercial exploitation, or human trafficking and expects its business partners to uphold these same standards and will not knowingly do business with those who do not.

C.A.T.'s commitment to these principles ensures the success and integrity of the entire organisation.

Respecting Privacy

C.A.T. reserves the right to request personal information necessary for effective operations or legal compliance.

Access to such information is strictly restricted to nominated C.A.T. personnel based on job requirements, or professionals nominated on C.A.T.'s behalf.

Compliance with applicable privacy laws and regulations is mandatory.

Employees handling personal data must

- Act in accordance with applicable laws.
- Adhere to relevant contractual obligations.
- Use and process information solely for legitimate business purposes.
- Limit access to authorized personnel; and
- Prevent unauthorized disclosure.

Maintaining a Healthy, Safe and Secure Working Environment

C.A.T. ensures safe and secure facilities for employees, partners, and shareholders including temporary offices, residential camps, and worksites.

Compliance includes:

- Promoting public health and hygiene practices.
- Ensuring supplier/subcontractor compliance with health and safety rules.
- Conducting employee safety training and providing adequate personal protective equipment.
- Monitoring safety performance.
- Obtaining and maintaining environmental permits.
- Handling and disposing of hazardous materials properly.
- Treating responsibly the discharges generated from operations.

Compliance Records:

- Audits, inspections, employee feedback, are managed by the HSSE Department.

Employees play a crucial role in maintaining safe and hazard-free work environments and preventing incidents and accidents.

C.A.T. commitment to privacy and safety ensures the well-being of the entire C.A.T. community.

Preserving a Violence and Harassment-Free Workplace

C.A.T. maintains a zero-tolerance policy towards violence, harassment, and/or bullying in any form. This includes, but is not limited to:

- Physical Violence
Such as pushing, hitting, or any form of physical harm
- Verbal Harassment
Including yelling, insulting, mocking, threatening, or degrading language
- Emotional or Psychological Abuse
Including intimidation, coercion, manipulation, humiliation, or persistent criticism intended to cause distress or undermine an individual's dignity
- Sexual or Discriminatory Harassment
Based on race, gender, religion, age, disability, or any protected category
- Other Threatening Behaviour
Such as displaying weapons, making threats (explicit or implied), or any conduct that creates fear of harm.

C.A.T. is committed to ensuring a safe, respectful, and inclusive work environment for all employees, free from all forms of abuse or hostility.

In the event of potential violence, employees must immediately contact the Security on premises.

Employees are responsible for upholding this Code. If an employee experiences violence in the workplace, they should first attempt to address the issue directly with the involved party when safe and appropriate.

If unresolved if the behaviour continues, the employee should refer to their direct manager. If the issue is not resolved or hidden by the manager, the employee should report the incident promptly via the Whistleblowing policy & procedure [DP-HR-120] for further guidance.

Employees who believe they have been subject to harassment or bullying or mistreatment by anyone at C.A.T., including business partners, must report the incident immediately to their supervisor in question and/or Human Resources. Supervisors and managers who become aware of such incidents are also required to report them to Human Resources. HR will have to conduct a thorough investigation of all complaints and take appropriate action.

Keeping a Drug and Alcohol-Free Workplace

The Company strictly prohibits any involvement in the possession, manufacture, distribution, sale, or purchase of any illicit substances or drugs in violation of applicable laws or in a manner that could negatively impact the business and its reputation.

In situations where an employee has reasonable grounds to believe that a colleague's or associate's use of alcohol or drugs may be affecting their job performance or compromising workplace safety, the concern should be formally escalated to the respective Area Human Resources Manager and/or representative. Based on the available evidence, HR may initiate an alcohol and/or drug screening in accordance with Company procedures and applicable regulations.

Reasonable suspicion may be based on observable symptoms such as the employee's appearance, behaviour, or speech. C.A.T.'s stance on substance abuse is unequivocal: It is incompatible with the health, safety, and security of employees, and it is not permitted.

Weapon-Free Workplace

C.A.T. forbids all individuals from bringing weapons of any kind onto its premises. This includes, but is not limited to, firearms (loaded or unloaded), ammunition, knives with blades intended for combat or intimidation, explosives or explosive devices, chemical sprays (such as pepper spray, mace) intended for use as a weapon, tasers or stun guns, batons or any blunt-force objects designed to injure, replica or toy weapons that could be perceived as real. Additionally, carrying a weapon while performing job duties for the Company is prohibited, regardless of whether the individual is on Company property at the time.

Conserving a Smoke-Free Workplace

C.A.T. is keen on ensuring a healthy, smoke-free environment for both employees and clients. This includes electronic cigarettes and vape. Smoking is only allowed in designated areas.

Projecting Proper Etiquette in the Workplace

Non-Discrimination

- C.A.T. strictly prohibits discrimination based on race, belief, colour, religion, gender, age, national origin, disability, or marital/family status, or any other characteristic whether protected by law or not. Such behaviour is intolerable and contradicts C.A.T.'s core values.

Professional Appearance

- Employees are expected to maintain a neat and professional appearance while at work and when representing the Company outside of work premises. Wearing C.A.T.'s designated personal protective equipment (PPE) and/or uniform is mandatory where required.

Respect and Privacy

- Employees shall respect the dignity and privacy of their colleagues through polite verbal and non-verbal conduct. This includes refraining from gossip, manipulation, falsification, or negative influence.
- Confidential information shall be secured and not exposed or accessible.

Workplace Cleanliness

- All facilities must be always kept tidy and clean to ensure a professional and organized work environment.

Betting and Gambling

C.A.T. prohibits any form of betting, gambling, or other games of chance on Company property or through Company resources. This includes, but is not limited to, activities such as betting, casino games, poker, slot machines, bingo, lotteries, or similar activities, whether conducting online using Company internet or physically on Company premises including offices, project sites, camps, accommodations, and vehicles.

Political and Religious Affiliations

To maintain a professional image and respect the diverse beliefs and feelings of all employees, discussions regarding political and religious affiliations are discouraged in the workplace. The display of political signs is forbidden.

Working Hours

Employees are expected to adhere to the established work schedule and manage their time efficiently. Prior approval from their Direct Manager is required for entering Company premises outside of working hours and on holidays.

5. Involvement in Corporate Social Responsibility

C.A.T. is committed to Corporate Social Responsibility.

As a responsible corporate citizen, C.A.T. values and prioritizes community involvement. C.A.T. actively engages in cooperative and collaborative efforts to enhance the quality of life, ensure public well-being, promote cultural advancement, and make the community a better place to live and conduct business. C.A.T. achieves commercial success by honouring ethical values

and respecting people, communities, and the natural environment. This involves minimising negative environmental and social impacts while maximizing positive ones. C.A.T. manages its business to achieve both commercial and social benefits focusing on improving results, reducing risks, and enhancing its reputation. C.A.T. is dedicated to growing its business in a way that provides value to everyone connected to it, managing social, community, and environmental impacts responsibly.

6. Electronic Communication and Internet Access

6.1 ELECTRONIC COMMUNICATION

C.A.T. relies on electronic communication tools to conduct business efficiently. These tools include, but are not limited to, the Internet, Intranet, email, instant messaging platforms (e.g. Microsoft Teams), wireless networks, telephones, fax machines, voicemail, and Company-provided computers (desktops, laptops, and mobile devices). All such resources are C.A.T. property.

Each employee is assigned an individual account and password to access their email and other systems. However, these accounts remain C.A.T. property, and email contents may be accessed by authorised personnel (e.g. IT administrators, HR, or senior management) for legitimate business purposes, such as compliance audits, security investigations, or operational needs. Employees should not assume that messages sent or received via C.A.T. systems are private.

Employees must refrain from sending unsolicited emails (spamming) to individuals or entities with whom they do not have a business relationship, unless expressly authorised by their supervisor. Limited personal use of communication tools (e.g. brief personal emails during breaks) is permitted, provided it does not interfere with work responsibilities or violate C.A.T. policies. Examples of inappropriate use include sending chain emails, sharing confidential information, or engaging in illegal activities.

Periodic, unannounced inspections of communication systems may occur to ensure compliance with this Code. Employees should treat these systems as shared resources and maintain professionalism in all communications.

6.2 INTERNET USAGE

Company-provided email, internet, and related systems (e.g. Intranet, cloud-based collaboration tools, video conferencing) are intended for business purposes only. Business purposes include activities directly related to an employee's job responsibilities, such as communicating with clients, accessing work-related resources, or collaborating with colleagues.

Employees are generally authorised to use these systems for job-related tasks without prior approval. However, specific activities — such as posting content on public networks (e.g. social media) or discussing Company services on private or public platforms — require prior written approval from Group HR and the Group Marketing & Communications departments. Examples of acceptable internet use include researching industry trends, accessing client portals, or using Company-approved software. Unacceptable use includes streaming non-work-related media, browsing social media for personal purposes, or engaging in online activities that violate Company policies.

All internet activity must comply with C.A.T. security protocols and confidentiality standards. Employees must not share Company information on unauthorised platforms or engage in activities that could harm the Company's reputation or operations.

6.3 MANAGING EXTERNAL FILES AND VIRUS PROTECTION

Files from external sources, including cloud storage, file-sharing platforms, email attachments, or devices brought from outside the Company (e.g. USB drives), may contain harmful viruses or malware that can damage C.A.T.'s network. To mitigate these risks, employees must:

- Scan all external files using Company-approved antivirus software before opening or downloading. This software is pre-installed on all Company PCs and laptops and configured to run automatically for most downloads.
- Avoid downloading files from unverified sources or accepting email attachments from unknown senders.
- Refrain from using non-Company storage devices or media without prior IT approval.

If an employee suspects that a virus or malware has been introduced to their device, they must immediately disconnect from the network (if safe to do so) and notify the IT Operations Department, that shall provide guidance on resolving the issue.

Employees are required to complete annual cybersecurity training to stay informed about current threats, such as phishing emails and malicious links, and to learn proper procedures for handling external files.

6.4 SOCIAL MEDIA

C.A.T. encourages the ethical, professional, and responsible use of social media to protect the interests of the Company and its employees while showcasing our dynamic culture and collective achievements.

With the launch of our C.A.T. LinkedIn Life page, we have created a dedicated platform to celebrate our people, share exciting initiatives, and promote our values to a wider audience. As such, employees are encouraged to actively engage in telling our story—by sharing authentic experiences, team successes, and project milestones—on their personal LinkedIn profiles in a way that reflects positively on both themselves and the Company.

To ensure consistency and alignment with our brand, employees should:

- Use the official hashtags: #cat, #catgroup, and #lifeatcat when posting company-related content.
- Keep posts professional, respectful, and aligned with C.A.T.'s core values and confidentiality obligations.
- Avoid disclosing any sensitive, confidential, or proprietary information.
- Refrain from commenting on behalf of the Company unless expressly authorized to do so by Group HR or the Group Marketing & Communications department.

Any external communication involving Company-related news, employee updates, or media engagement must be coordinated through Group HR and/or Group Marketing & Communications departments.

6.5 DIGITAL ETHICS AND AI GUIDELINES

C.A.T. is committed to ethical, safe, and sustainable operations, with a focus on responsible use of Artificial Intelligence (AI) and alignment with digital ethics principles. All employees, contractors, and partners must uphold these guidelines to ensure ethical, safe, and sustainable operations.

Integrity and Transparency

- Ensure transparency in AI use, clearly explaining functionality to stakeholders

Safety and Security

- Prioritize safety in all activities
- Test AI systems in safety-critical applications rigorously
- Protect AI systems and data against cyber threats with robust security measures

Environmental Responsibility

- Minimize environmental impact through sustainable practices, using AI to optimize resource use and reduce emissions.
- Comply with environmental regulations and monitor performance transparently.

Respect and Fairness

- Audit AI systems to prevent biases in hiring, operations, or community engagement.

Privacy and Data Ethics

- Safeguard sensitive data, use anonymized, minimal datasets for AI applications.
- Secure operational data used in AI against unauthorized access.

Accountability

- Take responsibility for all actions, including AI-driven outcomes.
- Establish oversight for AI systems, aligning with international frameworks.

Community Engagement

- Use AI ethically in social and environmental impact assessments, involving stakeholders.

Responsible Innovation

- Deploy human-centric AI to enhance efficiency while prioritizing worker safety.
- Innovate sustainably, aligning with global goals.

Compliance and Reporting

- Adhere to all relevant laws, regulations, and industry standards.
- Report violations or unethical AI use via code@cat.me

6.6 TELEPHONE & MOBILE USAGE

Effective communication is essential to C.A.T.'s work environment and daily business operations. As representatives of C.A.T., employees' interactions with internal and external clients reflect on the Company, their department, colleagues, and themselves. Therefore, maintaining excellent communication is crucial.

Answering the telephone is the responsibility of all employees. While personal telephone calls are not prohibited, their frequency, duration, and volume should not interfere with work duties or distract colleagues. This applies to both incoming and outgoing calls.

Mobile Phone Usage

Employees are expected to exercise discretion when using their mobile phones at work. Personal calls during work hours, regardless of the phone being used, can interfere with productivity, safety, and may be distracting to others.

Employees are encouraged to make personal calls during breaks and lunch.

Mobile phones must not be used to defame, harass, intimidate, or threaten any person. Using mobile phones in any illegal, illicit, or offensive manner is prohibited.

Prohibited Mobile Phone Activities

- Playing games, surfing private accounts, watching non-work-related visual materials or any other non-work-related activities on phones during working hours.

- Using the phone while operating a Company vehicle.
- Using the phone's camera or microphone to record confidential information or conversations.
- Using the phone in areas where it is explicitly prohibited.
- Speaking on the phone within earshot of colleagues' working space during working hours.
- Downloading or uploading inappropriate, illegal, or obscene material on a company cell phone using a corporate internet connection.

Permitted Mobile Phone Activities

- Making business calls.
- Using productivity apps.
- Checking important messages.
- Making brief personal calls away from colleagues' working space.

7. Ethical & Lawful Information Gathering

C.A.T. gathers information about competitors, suppliers, and clients in an ethical and appropriate manner. C.A.T. respects intellectual property, copyright laws, and other related regulations, ensuring that all activities align with its identities and values.

8. Avoiding Conflict of Interest

Conflicts of interest may arise when employees engage in certain activities as private individuals. Employees must prioritize the interest of C.A.T. over personal interests. Business transactions between C.A.T. and its stakeholders should be influenced solely by the welfare of C.A.T. and not by any other factors.

Employees are strictly prohibited from engaging in business relations with competitors or sharing confidential Company information. Employees shall declare any private participation in businesses outside the scope of C.A.T.

Employees shall avoid activities that create or appear to create a conflict of interest. The appearance of a conflict of interest can be as damaging as an actual conflict.

A conflict of interest is a situation in which the employee has a personal interest that:

- Interferes with their duties and responsibilities towards the Company.
- Is inconsistent with their obligation to exercise best judgment pursuing C.A.T.'s interests.
- Results in an improper personal benefit due to their position within the Company (e.g., any false invoicing directly or through third parties).
- Affects their performance by reducing the time devoted to their work in the Company.
- Involves acting on behalf of the Company in any transaction where they or their immediate family has/have a significant direct interest.
- Involves participating in a political body where they may be perceived as representing the Company (without formal empowerment) and/or contributes to political activity during working hours or uses Company property for such an activity.

8.1 DEALING WITH SUPPLIERS, CLIENTS, AND OTHER STAKEHOLDERS

Employees must act in the best interest of C.A.T. while performing their duties and exercise particular care when selecting or dealing with suppliers on behalf of the Company. Personal interests and relationships must not interfere, or appear to interfere, with the ability to make decisions in the best interest of the Company. When selecting suppliers, applicable Company guidelines must be followed. Employees involved in making business decisions for the Company must do so consistently, fairly, and in the best interests of the Company. Therefore, employees shall not accept any gifts, entertainment, or gratitude that could influence or be perceived to influence their business decisions or that could result in any direct or indirect benefit or interest from any party having business dealings with the Company.

Invitations to business lunches or dinners may be accepted. However, for events without a prevailing business character (e.g. concerts, theatre plays, sports events, other evening events, etc.), employees must ensure their participation aligns with common business practices.

In addition, infrequent and moderate business meals and entertainment with clients as well as occasional invitations to local sporting events and celebratory meals can be appropriate aspects of many business relationships, provided that they are not excessive (not valued at more than \$1,000) and do not create the appearance of impropriety.

Before accepting any gift or courtesy, employees must obtain managerial approval from Direct Manager, Head of Department, or Human Resources Department. When in doubt, matter is referred to the appointed committee for approval (refer to section 14.2).

8.2 OUTSIDE EMPLOYMENT

Employees seeking to engage in outside employment must discuss the matter with their concerned manager, who will escalate the request to the Group Manager: Human Resources. The Group Manager: Human Resources reserves the right to approve or deny the request after consulting with the Senior Management of the relevant division and ensuring there is no conflict of interest with the Company. Employees are strictly prohibited from being employed by, providing services for, or receiving payment from any client, supplier, or competitor of the Company without prior written approval.

Additionally, employees must obtain prior written approval before accepting reimbursement for expenses, or any other payment, for speeches or presentations outside the Company, if:

- The speech or presentation is part of the employee's job with the Company.
- The speech or presentation describes the employee's work with the Company.
- The employee is formally identified at the speech or presentation as an employee of the Company.

9. Maintaining Business Expenses

Employees are strictly prohibited from approving their own business expenses or requesting approval of those expenses by anyone who reports directly or indirectly to them. Expense approvals shall be obtained in accordance with the Company policies and procedures and in coordination with Senior Management. All expense items related to travel or local business matters, including but not limited to airfare,

hotel expenses, taxi services, car rental, business meals, and entertainment shall be accurately and fully recorded on the expense report with applicable receipts attached. The documentation should clearly identify the parties involved and include a brief description of the business matter that supports the expenses.

10. Accurate Records & Disclosures

The CEO, Leadership Team, directors, managers, and employees are all responsible for upholding and promoting integrity throughout the Company. All reports submitted by the Company under applicable laws, policies, and procedures as well as in public communications, shall be accurate, timely, and comprehensive. Inaccurate reporting, both internally and externally, must not be tolerated, including any attempts to mislead and misinform.

Employees are responsible for maintaining accurate, dependable, and complete records of their activities. If there's any doubt about the accuracy or reliability of information, employees shall take steps to verify it or immediately contact their Direct Manager, Head of Department, or Human Resources Department.

For all data entry into C.A.T. ERP systems, employees must ensure that no false entries are made under any circumstances, and all data is entered accurately and truthfully. All such data must be maintained in accordance with business policies and local legal requirements. No entry should be made in the Company books and records that intentionally hides or disguises the true nature of the transaction. Directors and employees are prohibited from interfering with or seeking to improperly influence, directly or indirectly, the external auditing process of Company's financial records.

C.A.T. has a significant responsibility to ensure the accuracy of all business and financial records, including financial accounts, quality reports, time records, expense reports, and submissions such as benefits claim forms and résumés. Ensuring accurate and complete business and financial records is everyone's responsibility.

Keeping accurate records is essential for protecting the Company's reputation and meeting legal and regulatory requirements.

All transactions must be recorded in the correct accounting period, account, and department. Recording of revenue or expenses must not be delayed or accelerated to meet budget targets. Estimates and accruals must be reasonable, well-documented, and based on sound judgment.

Reports submitted to regulatory authorities must be complete, accurate, timely, and easy to understand.

- All documents should reflect the true nature of transactions.
- Business practices must align with tax laws and currency regulations.
- Payments are to be made directly to the provider of goods or services.

11. Protecting Company Property

Company assets, facilities, or services must be used only for lawful, proper, and authorised purposes. Company equipment, systems, facilities, corporate credit cards (for travel expenses, client entertainment, etc.), and supplies, should be used solely for conducting business or for purposes authorised by Management.

Employees must remain vigilant to any situations or incidents that could lead to the loss, misuse, or theft of Company property (e.g. assets and/or cash money) and shall report all such situations to their direct manager and HR. Company assets must not be used for personal benefit, sold, loaned to others, given away, or otherwise disposed of without proper authorisation from HR, Management Information Systems (MIS), and/or Facilities Departments.

Excessive personal calls or e-mail is a misuse of assets. Company policy may allow additional personal use of certain assets, such as a Company car or wireless communication device. Employees should check relevant policies to ensure that Company assets are being used as intended.

Theft of Company assets – whether physical theft such as unauthorised removal of Company product, equipment, or information, or through misuse or intentional misreporting of time or expenses – may result in disciplinary action. The same applies to workplace theft of assets belonging to other employees.

Using Company assets outside of your Company responsibilities requires prior written approval from the manager. Personal activities during work hours that interfere with or prevent the fulfilment of job responsibilities should be avoided.

Company computers and equipment must not be used for outside businesses, or for illegal or unethical activities, such as gambling, or for any unauthorised, inappropriate, abusive, or otherwise offensive purposes. Any opportunities for financial gain that arise from one's position at the Company, or from using Company property or information, must not be exploited for personal benefit.

12. Protecting Confidential Information

12.1 DEFINITION OF CONFIDENTIAL INFORMATION

Information obtained, whether verbally or in writing, during employment with the Company is to be treated as confidential. Confidential information is generally not known to the public and, if improperly disclosed, may either harm the Company, clients, or suppliers, or give competitors an unfair advantage. This includes proprietary information and intellectual property regardless of how it is stored, compiled, or memorized, for which the Company takes reasonable measures to protect.

12.2 RESPECTING CONFIDENTIAL INFORMATION

C.A.T. employees will occasionally have access to confidential information related to the Company, its clients, or other stakeholders. All information or material handled by C.A.T. employees, suppliers, or subcontractors related to any client business relationship including but not limited to tenders, agreements, documents, drawings, data, and information of any kind should be treated as confidential and not disclosed without the client's prior written permission.

Confidential information must be protected regardless of whether there is a written agreement covering it. Such information should not be accessible to unauthorised persons and must be secured with limited access to authorised personnel only and archived in a safe place. Employees must comply with applicable laws and

protect the confidentiality of clients, suppliers, and colleagues. Without prior written authorisation, employees shall not release data related to any aspect of the Company, suppliers, or clients to third parties. Any approved release of information shall be on a strict need-to-know basis.

Employees are restricted from releasing information including but not limited to:

- Non-public information obtained or created during activities with the Company.
- Financial information about the Company status.
- Information related to clients' accounts.
- Third-party information entrusted by the Company suppliers and business contacts.
- Information related to employees' salary, medical, personal, or professional history.
- Any other information that is proprietary to the Company, clients, suppliers, or representatives, including but not limited to, financial, technical know-how, scientific, economic, or engineering information, client lists, technical plans, formula methods, techniques, processes, policies, procedures, programmes, and codes.

12.3 COMMITTING TO CONFIDENTIALITY

Employees' obligation to maintain the confidentiality of information continues even after leaving the Company as per their contract

and applicable laws. Employees shall not use any proprietary information for personnel gain, including any originals or copies of manuals, drawings, reports, notes, proposals, or other property belonging to the Company, which shall either be retained within the Company or returned.

Employees acknowledge that any work, invention, creation, or intellectual property developed as part of their employment scope is owned exclusively by C.A.T. and agree to disclose any such work to the Company and, upon request, execute any necessary documents to formally assign ownership to the Company.

Employees are prohibited from removing or transferring any Company records or data as these are the sole property of the Company and/or its client. Undue gossiping by employees, even outside work hours and off Company premises, may cause negative effects and leaks of confidential information and should be strictly avoided.

If an employee is required by any law, judicial order, governmental regulation, rule, competent court, or authority to disclose confidential information, the employee must promptly inform Group Manager: Human Resources in writing. This allows the Company to seek a protective order or other appropriate remedy. The notice must include identification of the information to be disclosed and a copy of the order. The employee shall coordinate with Group Manager: Human Resources and disclose only the information required, using all best efforts to ensure that any disclosed confidential information is accorded confidential treatment.

C.A.T. reserves the right to seek legal remedies, including interim relief or specific performance, for any breach of confidentiality.

Employees acknowledge that, if required, they may be asked to sign an additional confidentiality agreement or undertaking upon C.A.T.'s request to further protect proprietary information.

13. Protecting Company Reputation

C.A.T. is committed to preserving the Company's reputation untarnished. Employees and business partners must not speak publicly on behalf of the Company unless authorised by the competent authorities. If designated as the official spokesperson, the assignment must be made in writing by the CEO. Internal matters should not be disclosed publicly.

To maintain clear and consistent communications, all inquiries from the media and the public regarding the Company must be referred to the appropriate authority designated by the CEO. These inquiries include, but are not limited to, matters related to the Company's business, products, policies, activities, financial results, or investments.

14. Reporting Violation Complaints

Employees who are aware of or suspect misconduct, illegal activities, including but not limited to fraud, money laundering, terrorism, crime financing, or any other violation of Company policies, procedures, or this Code, should promptly consult their Direct Manager, Head of Department, or Group Manager: Human Resources under the Whistleblowing policy. Whistleblowing involves reporting any form of misconduct, particularly breaches of legal requirements or immoral behaviour. Examples include but are not limited to:

- Breach of a legal requirement (e.g. health and safety obligations owed by C.A.T.)
- General malpractice (i.e. immoral, illegal, or unethical conduct)
- Breach of audit or other applicable regulations
- Breach of the Code of Ethics & Business Conduct of C.A.T., C.A.T. Client, and other relevant institutions.

It is the duty of all employees to notify C.A.T. of any observed unethical business conduct or illegal acts. Failure to promptly raise a known or suspected violation is considered unethical behaviour. Individuals may disclose information anonymously if they believe it is important to the well-being of the Company, C.A.T. will strive to protect the identity of the individual involved and the disclosure. If disclosure of identity is necessary, discussions will be held. However, employees are encouraged

to provide information openly to lend credibility to the case. Anonymous concerns will not be taken lightly. Whistleblowers reporting violations in good faith and in alignment with the Whistleblowing Policy will be protected against acts of retaliation, harassment, or victimization.

All cases of whistleblowing will be documented accurately and in a timely manner in C.A.T. records. The Company will ensure that no false entries are made under any circumstances, and that the confidentiality of these documents is always maintained to protect employees.

14.1 AUTHORITY AND RESPONSIBILITIES

C.A.T. is committed to promoting a culture of openness, accountability, and integrity, with zero tolerance for harassment, victimization, or discrimination against whistleblowers, provided such disclosures are made in good faith. The CEO, CRO and the Group Manager: Human Resources will oversee communication, training, monitoring, and overall compliance with this Code of Ethics & Business Conduct, with the assistance and cooperation of the Company officers, directors, and managers, to foster an atmosphere where employees feel comfortable reporting concerns and possible Code violations.

14.2 REPORTING MECHANISM

Employees can report their concerns or complaints personally or via email to a person / committee appointed in a memo issued by the CEO to handle all reported cases and/or claims.

The memo shall indicate the appointed person(s) name, phone number, and address. This memo can be amended from time to time, and the latest memo of appointment of the person(s) shall always be attached to this Code of Ethics & Business Conduct.

Urgent matters requiring immediate action shall be brought to the attention of the Director of Internal Audit through ad-hoc reporting and meetings. Employees reporting illegal or suspicious activities will be appropriately protected, and their identity will remain anonymous, to the extent possible.

14.3 INVESTIGATIONS

The Company is unwavering in its commitment to thoroughly investigate reported violations and take appropriate action as determined by the Audit Committee. Decisions will be based on factual accounts gathered during formal investigations. Employees are obligated to fully cooperate and must not withhold information related to ethical concerns. Any such information should be promptly brought to the attention of higher management.

14.4 CONFIDENTIALITY AND PROTECTION AGAINST RETALIATION

Confidentiality is extremely important. Investigators shall not disclose the identity of the reporting person without their explicit permission except when unavoidable. Retaliation against individuals, who in good faith report potential violations even if the report is mistaken, is prohibited. Any form of retaliation, including harassment or victimization, resulting from adherence to this Code of Ethics & Business Conduct or other C.A.T. regulations, constitutes a breach and will be addressed accordingly.

15. Monitoring & Compliance of the Code

C.A.T. upholds the highest standards of ethical conduct. To achieve this, both, C.A.T. Management and C.A.T.'s valued suppliers and subcontractors, are required to conduct regular internal reviews and inspections. These efforts ensure strict adherence to the Code of Ethics & Business Conduct as well as any applicable guidelines from C.A.T. Clients.

To demonstrate C.A.T.'s commitment, comprehensive compliance records are accurately maintained and available upon request. If any employee, supplier, subcontractor, or any other stakeholder identifies potential non-compliance whether related to conflicts of interest, unethical behaviour or fraud, it is their duty to promptly and confidentially report it.

For reporting, an employee shall reach out to the person(s) appointed in the memo issued by the CEO which is attached to this Code of Ethics & Business Conduct. The memo indicates the appointed person name, phone number, and address.

Consequences for non-compliance are clear:

- **C.A.T. employees:** Any breach of this Code will result in disciplinary action, including immediate dismissal and, if necessary, legal measures.
- **C.A.T. Suppliers or Subcontractors:** Non-compliance will be treated as a breach of C.A.T.'s Purchase Order or Subcontract agreement Terms and Conditions, and appropriate actions will follow.

16. Amendments to the Code of Ethics & Business Conduct

The authority to amend this Code rests solely with C.A.T. CEO. Any changes will be promptly disclosed in accordance with legal requirements and C.A.T. policies. Regular reviews occur every two years overseen by the Group Human Resources Department and the Director of Corporate Governance. Recommendations for modifications are made as needed and presented to C.A.T. CEO.

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C.A.T. reserves the right to revise this document at any time.

Acknowledgement and Receipt of
the Code of Ethics & Business Conduct

I hereby acknowledge that I have thoroughly read and comprehended the C.A.T. Code of Ethics & Business Conduct. Furthermore, I affirm my understanding, and approval of all obligations, duties, and responsibilities within each provision of the Code and any of its future amendments or modifications I receive. I am aware that violations of the Code may result in disciplinary action including termination of employment.

By signing below, I confirm my acknowledgement and acceptance in the statement above:

Area

Employee Name

Employee ID

Employee Signature

Date