

#### **CODE OF CONDUCT**

#### TUNNEL SADD ARIANA CO

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TUNNEL SADD ARIANA

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#### INTRODUCTION

The purpose of this code of conduct is to help stakeholders understand what is expected from the Tunnel Sadd Ariana Company (the main contractor) and Stakeholders. It is a set of legal, ethical, and moral guidelines that describe the behavior we expect of each of us as a community and the minimum standards against which we hold ourselves accountable. This code of conduct applies to all workforces, who are either employee of the main contractor, its co-workers, subcontractors, and security workers. All employees are expected to conduct themselves in a professional and courteous manner and observe the following standards of behavior under Core Values:

#### HEALTH, SAFETY AND SECURITY

I acknowledge that upon signing this document, I have observed and understood the job's health and safety policies and obligations.

- It is my duty to create a safe environment and to prevent accidents and injuries to myself and my co-workers.
- Each of us has a duty to look out for one another and keep each other safe.
- Strictly adhering to the requirements of the HSE Plan, at all times, is mandatory.
- I will be thoughtful of and attend to information, instruction and training relating to health and safety hazards, risks, protective and preventive measures and emergency arrangements that are conducted by the HSE team throughout the project.
- In case of any accidents, injury and ill-health, or potential of such event, I will notify and cooperate with the HSE officer/team to investigate, document, analyze the findings and adopt measures to prevent reoccurrence.
- I understand the primacy of and will utilize the protective equipment given to me at job site at all times as instructed by the HSE officer.
- I must work in a methodical and careful manner.
- If I am asked to do anything that I feel I am not qualified for, or experienced enough to do safely, I will share my concerns with the HSE officer immediately.
- I do not consume or possess drugs or alcohol in the workplace or attend work under the influence of drugs or alcohol. The risk of harming myself or others by working while intoxicated with alcohol or drugs (legal or illegal) that has weakened my abilities and coordination is unacceptable.
- Out of our duty to look out for one another, I am required to report an intoxicated coworker to our safety officer immediately.



- In observing the legislation that prohibits smoking in public environments, I will only smoke in designated smoking areas.
- I will stop work in situations of imminent danger and report any unsafe acts and conditions in the workplace to the safety officer.
- I understand that the outbreak of COVID 19 is serious. I am committed to follow the HSE team's trainings to safeguard it. I will conduct extended care to use sanitary items (disinfectants, masks, gloves, etc.) available on the job site.
- I respect all operations with discipline and I will avoid and report, if observed, horseplay at all times while working on site or at labor camps.

#### 2. GENDER BASED VIOLENCE, HARASSMENT AND BULLYING

Violence and harassment" is a continuum of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, having the aim of causing physical, psychosocial, or economic harm, including GBV. GBV is an umbrella term for acts of sexual harassment, sexual exploitation and abuse, directed at a person on the basis of their sex or gender, or that affects persons of a particular sex or gender disproportionately.

- I understand that saying or doing anything that a co-worker would find unwelcome, humiliating, intimidating or offensive will not be tolerated.
- I do not engage in sexual or other unlawful harassment or bullying in the workplace.
- When I witness interactions that might be considered harassment or bullying, by a fellow employee or management, I will bring such behavior to the attention of the HSE officer/social expert.
- I understand that gender based violence risks of sexual harassment, sexual exploitation and abuse to project-affected persons and communities will be monitored and where appropriate, the client will adopt specific measures to prevent and address these risks, including the provision of confidential channels for reporting incidents and providing support.

### 3. LABOR AND WORKING CONDITIONS

- I acknowledge that upon signing this document, I have fully understood the policies governing the quality and management of job site accommodation and provision of services.
- I understand that work is carried out to tight deadlines and thus, I cooperate through maintaining punctuality.
- I respect the company's ownership of all company funds, equipment, supplies, books, records and property and do my best to protect them.
- I dress in an appropriate manner and ensure that my appearance is presentable, clean, neat and tidy.



- I do not fight in the workplace/labor camp.
- I do not swear in the workplace/labor camp.
- I understand that the project site is at tans-border location and I am aware of and committed to follow border control regulations for commuting

# 4. PROMOTION OF RESPECT FOR THE ENVIRONMENT

- I acknowledge that I have a moral and legal responsibility to safeguard the environment.
- Protecting the environment is as important as protecting the safety of my co-workers.
- I am conscious of the impact of my activities on the environment and the communities around me.
- I will do my best to use the minimal amount of water, energy, and material (of any kind) at all times.
- I understand the importance of avoiding pollution on-site, including noise and dust, and how to act in response to an incident event.
- I will dispose solid and fluid wastes and avoid contaminating the campsite/jobsite in terms of soil, air, runoff and the river.
- Should a spill or other contamination occur, I will report it immediately to the HSE officer.
- I understand that any attempt to conceal a contamination event is expressly prohibited.
- I am concerned about environmental risks at jog site and will alert the HSE officer accordingly.
- I will attend and be committed to:
- Receive training on the CEMP and associated work plans.
- Receive an orientation of all known or reasonably foreseeable environmental, health and safety hazards of the job site and the work, in general compliance with the CEMP.
- Work and cooperate with the HSE team: safety officer, social expert, environmental specialist (under the supervision of the HSE Manager)
- I will work in accordance with approved plans, method statements and procedures specified with the CEMP to minimize environmental impacts.



## 5. ETHICAL CONDUCT

I acknowledge that the focus of this document is not on <u>what I do</u> as a co-worker in a specific situation, but <u>what kind of co-worker I am</u> at all times.

- I act with honesty and integrity and tell the truth.
- I honor my commitments at work. When I make a promise to a client or a co-worker, I do my utmost to keep it.
- I hold myself accountable for what I say and do and take responsibility for my mistakes, errors and omissions at all times.
- I maintain, during employment and after the termination of employment, the confidentiality of any confidential information, records or other materials acquired during the course of employment.
- I understand that I may not engage in any outside employment or conduct any business, trade or profession without written permission from my Managing Director.
- I will not receive gifts or monetary favors from clients or similar that result in personal financial benefit.
- I do not misappropriate company property that is under my control, including information, for personal benefit.
- I ensure that business-related purchases are kept separate from personal purchases and that reimbursement is transparent and correct.
- Public assets must not be used for personal benefit and should be used properly, sensibly and effectively, at all times.
- I understand that improperly influencing other people, misrepresenting the situation or exploiting the trust I have been given will, ultimately, damage the reputation and prosperity of the contractor and its colleagues.
- I do not use my position for unfair, dishonest or illegal personal benefit.
- I understand that bribery involves deliberately making a payment, of any value, to any person to (i) distort a proper decision-making process, (ii) to influence a person's decision, (iii) to secure improper commercial advantage or (iv) to enter into a dishonest arrangement.
- I acknowledge that corruption is the act of modifying the usual course of one's function in such a way that it results in personal advantage or profit. Any form of exploitation of the company for personal advantage or profit is prohibited.
- If I am at all concerned that any activity (either my own activity or that of another employee) could represent bribery or corruption, I am required to raise this with my manager. Consideration of Others Some clauses here will address respectful observance of versatile national and religion preference of the parties involved in the project.
- I understand that the jobsite/camp is located near mixed communities with different cultural, language and religious backgrounds. Mindfully, I will conduct my behavior to reflect the value of



an inclusive workplace with respect for different points of view between individuals at work and the surrounding communities.

- I have an obligation, and a personal responsibility, to protect the privacy of other employees, clients, contractors and suppliers.
- I will cooperate with public authorities, as instructed by my manager/ HSE officer in measures to avoid or mitigate community health and safety impacts of the project.
- As an employee of the contractor, I will conduct relations with local community in line with recommendations from the HSE officer/social expert.
- I understand that as an employee, I am unlikely to be in a position to know all the facts and, consequently, may give the wrong impression/information, which could prove damaging to the image and reputation of the main contractor. Similarly, my statements on disputes or site incidents can easily be misinterpreted when they are not based on a complete knowledge of the facts of a particular case. Therefore, I will avoid personally communicating such issues to the local public.
- I am aware that my work may associate with risks and adverse impacts to the health, safety and security of local communities and will cooperate with the HSE team to implement protection, prevention and mitigation measures proportionate to the stage, size and nature of my work.
- In case measures to avoid or mitigate community health and safety impacts of my work are the responsibility of relevant public authorities as communicated via the HSE officer, I will cooperate with the authorities accordingly.

#### 6. COMPLIANCE WITH THE LAW

The laws and regulations that govern us are designed to make our lives as free, fair and safe as possible.

- I understand that any deliberate breaches of the law will be dealt with very seriously.
- As an employee, I am obligated to adhere to all regulations pertinent to my job. This includes all laws, organizational policies, procedures, contracts as well as reasonable and legal instructions by the main contractor.
- I will treat clients, suppliers, co-workers, company management and the general public in a nondiscriminatory manner with proper regard for their rights and dignity.
- I will promptly report any violations of law, ethical principles or policies that come to my attention.

#### PURSUIT OF EXCELLENCE

Our work quality and the trust and respect of our colleagues and clients are important to us.

- I will seek to acquire the knowledge, skills and competences necessary for the efficient discharge of my duties.
- I will not be influenced by social and political affiliations in the performance of my duties.



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• I will strive to achieve my highest standard of performance, that means: (a) Use my time, skills and expertise to attain the approved goals of the project. (b) Acquire new knowledge and skills continuously and use them effectively. (c) Recognize the need for technical training and seek to obtain it. (d) Encourage and recognize creativity and initiative among subordinates in the performance of my duties.

Breaches of the Code of Conduct are considered a very serious matter and will be dealt with in accordance with national and international legal penalties, which includes termination of employment. All Managers and operations coordinators are responsible for monitoring and evaluating the operation of this policy within their area of responsibility and reporting accordingly to the main contractor's project manager.

#### Ali Mousavi Rahimi

Managing Director



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