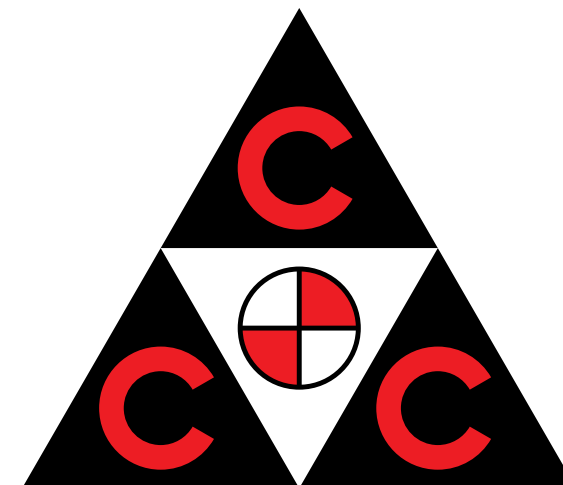


VALUES & GUIDING PRINCIPLES

CODE OF CONDUCT



Code of Conduct

CONTENTS

“
CCC core family values and principles
define the framework of our global
operations.”



OUR CODE OF CONDUCT & VALUES



OUR CODE OF CONDUCT ROOTED IN OUR VALUES



Living in this troubled world where human values and simple good principles are no longer the beliefs of many people around us, one must remember that neither short-term benefits nor following others can justify us to deviate from our main principles and beliefs.

Said Khoury, 1923-2014



VALUES ARE A FAMILY LEGACY

History has taught us that people, families and organizations can come and go but the only thing that remains is the legacy of values that has been left behind by the founding generation.

It is nearly 70 years since CCC was established. With the entrepreneurial leadership and the business acumen of its founders, as well as the unrelenting dedication and loyalty of its employees, CCC nurtured a successful legacy worthy of appreciation. Despite the fluctuating and severe economic, social and political challenges that afflicted CCC's regions of operations, the organization has been able to continuously overcome them with great proficiency, vigor and valor.

CCC has maintained its leadership role with the continuous commitment to excellence, loyalty and hard work of each and every member of the CCC family. The decisive factor all through the decades manifests itself in the set of unique cultural traits its employees and management have consistently adopted. Industrious proficiency, unwavering loyalty, enduring dedication and respectful compassion are major ingredients of CCC's familial cultural traits.

The strong cultural traits that CCC absorbed from our special familial background kept the internal social and economic fabric of our company resilient, while the external relationships remained sustainable under all circumstances.

CCC's VALUES & PRINCIPLES

The corporate values CCC has been practicing throughout its history set the ultimate guideline for organizational behavior and constitute the unique culture of the company. Guided by CCC's distinctive culture the company manifests its long-term commitment on the basis of responsible growth and respect towards people and the environment.

CCC's values of nurturing human and business relationships create mutual strengths and shared value. Our corporate culture embodies a heightened sense of sensitivity and as a result we believe that a responsible approach towards all our operations, our employees, clients, suppliers, local communities, the environment and society as a whole, is an essential part of our success.

- Integrity, Honesty & Reliability
- Trust, Transparency & Humility
- Sense of Belonging & Harmony for all Company Employees
- We Aim to Be Second to None in All We Do
- Fairness to all Stakeholders
- We Respect Hierarchy & Accountability
- Protecting Human Life Is Our Goal
- We Encourage Innovation
- We Nourish Long-Term Relationships



CCC's values are a family legacy carried by the founders and transplanted into the organization. In the course of 70 years, these values have been nourished and cultivated to outstanding success.



Our philosophy of long-term sustainability in countries of operations is transmitted through the establishment of permanent offices and in-country area management who work together with local companies, governments and clients. We supply innovative solutions across the markets and industries around the world, by combining our immense construction and engineering expertise and experience gained over the last 70 years.

Our full commitment to The Code of Conduct is required to cultivate our sustainability and development in this challenging world.

- Our Staff Is Our Greatest Asset
- Commitment to Preserve the CCC Family Culture
- Commitment to the Community
- Commitment to the Environment
- Commitment towards Anti-Corruption
- Commitment to Change for the Better
- Appreciation of our Staff
- Commitment to the Development of Future Generations

CHAIRMAN'S STATEMENT

At Consolidated Contractors Group (CCC) we promote a culture that mandates and encourages ethical behavior. We conduct business in a manner that adheres to foundational principles and is compliant with all applicable laws in the countries in which we operate. The global and diversified nature of CCC group's business activities are subject to a wide variety of regulations, policies, and procedures. The group is an active participant in a wide range of prestigious associations that frame and define ethical corporate behavior on national and international levels.

Our code means acting with integrity, honesty and observing the group's core values, policies and ethical framework at all times. We aim to maintain measurable objectives that will ensure effective implementation, monitoring and continuous improvement.

The Code as adopted by our Board of Directors provides our senior executives and employees with the policies that govern our worldwide operations and the tools necessary to make business decisions. All employees are bound by the provisions set forth in The Code relating to ethical conduct and compliance with the law. The Code is an extension of our founders' family values and is the foundation for our long-term success. Every employee, regardless of function, position, or location, has the obligation to read The Code, understand it and apply its principles in our daily work with no exceptions. Our policies and procedures must always be followed even if doing so may, on occasions, result in CCC losing business.

The Code is designed to help you act according to the CCC's high ethical standards. It is important that you read, understand and follow The Code, comply with all pertinent laws, and refrain from business situations that would put CCC's reputation at risk.

Our suppliers, subcontractors and partners are expected to share our values and to apply ethical and compliance standards that are equivalent to ours.

CCC was formed nearly seventy years ago. Since our creation we have worked hard to develop and enhance the reputation of our company. The success of this endeavor could be lost overnight if any of us fail to honor and comply with the obligations, contained in The Code. This places a heavy responsibility on all members of the CCC family. Your actions and conduct will reflect on yourself and the company. I want a culture of compliance with best practice to be at the heart of all that we do. I am relying on all our employees and senior executives to make this a reality by strict adherence to The Code.



Samer S. Khoury

Chairman

OUR CODE OF CONDUCT & VALUES





OUR CODE OF CONDUCT & VALUES

WE ARE COMMITTED TO PRESERVE THE CCC FAMILY CULTURE

We have revised CCC's Code of Conduct to reflect global standards in our field of operation in this rapid globalized industry. The corporate values that CCC has been practicing throughout its history set the ultimate guideline for organizational behavior and constitute the unique culture of the company.

Guided by CCC's distinctive culture the company manifests its long-term commitment based on responsible growth and respect towards people and the environment.

Our code of conduct captures how we express our values and behaviors. Effectively, The Code tells others what they can expect of us. We must hold each other accountable and challenge ourselves when we feel our values and standards are being undermined or our reputation is put at risk.

CCC's values of nurturing human and business relationships creates mutual strengths and shared values. Our corporate culture embodies a heightened sense of sensitivity and as a result we believe that a responsible approach towards all our operations, our employees, clients, suppliers, local communities, the environment and society as a whole, is an essential part of our success.

Our long-term sustainability in countries of operations is transmitted through the establishment of permanent offices and in-country area managers who work together with local companies, governments and clients.

Therefore, to allow CCC to become a company continuously trusted by society and a global leader, we supply innovative solutions across the markets and industries around the world, by combining our immense construction and engineering expertise and experiences gained over the last 70 years. The Code is the guide for holding in full commitment to maintain our sustainability and development in this challenging world.

Jamal Bahlawan

Chief Executive Officer
Consolidated Contractors Group (CCC)



*We Aim to Be Second to
None in All We Do*



OUR CODE OF CONDUCT & VALUES

HOW THE CODE APPLIES TO YOU!

WHO DOES IT APPLY TO?

The Code is applicable to all our staff globally.

We are committed to working with third parties, joint ventures and partners whose standards are consistent with our code of conduct and values.

CCC's GROUP staff must perform all activities with honesty, integrity and in full compliance with the law and the prevailing legal constraints. Due attention should be given to the interests of CCC's clients, employees, management and owners.

To achieve these objectives, it is necessary to clearly define and communicate the Guiding Principles and The Code of Practice under which CCC operates.

Respect of The Code is essential for CCC employees to maintain CCC's reputation and to ensure its continuous success and prosperity.

WHAT DOES IT MEAN PRACTICALLY?

Managers shall pledge to comply with The Code are responsible for supporting their teams and explaining The Code's requirements including their applications.

If employees become aware of any non-compliant activity, they shall immediately report to their manager or follow the internal reporting systems. The Code requires employees to follow the principles outlined below:

- Respect the values of The Code and rules that govern various activities.
- Adhere to The Code as it is an essential aspect of every employee's performance.
- Report the detection of any direct or indirect deviations from The Code.
- Take corrective measures whenever necessary.
- Refrain from any type of conduct that is not compatible to- or contradicts the practices expressed in The Code.
- Consult their manager whenever clarifications are needed- If in doubt, you can always ask your manager!



SPEAK UP

OUR CODE OF CONDUCT & VALUES

GLOBAL ETHICS & COMPLIANCE COMMUNICATION PORTAL

CCC [Ethics Webline - Open Box](#), is a confidential service that allows officers, employees and external partners to speak to a trained professional in order to raise concerns or report issues related to violations of policies, procedures, standards, laws and regulations witnessed at work.

Received reports will be forwarded to the CCC Executive Officers for investigation and action in confidentiality. Appropriate actions are taken in cooperation with specialized departments and reported to the Audit Department to facilitate an investigation.

When Employees Speak Up, Companies Win



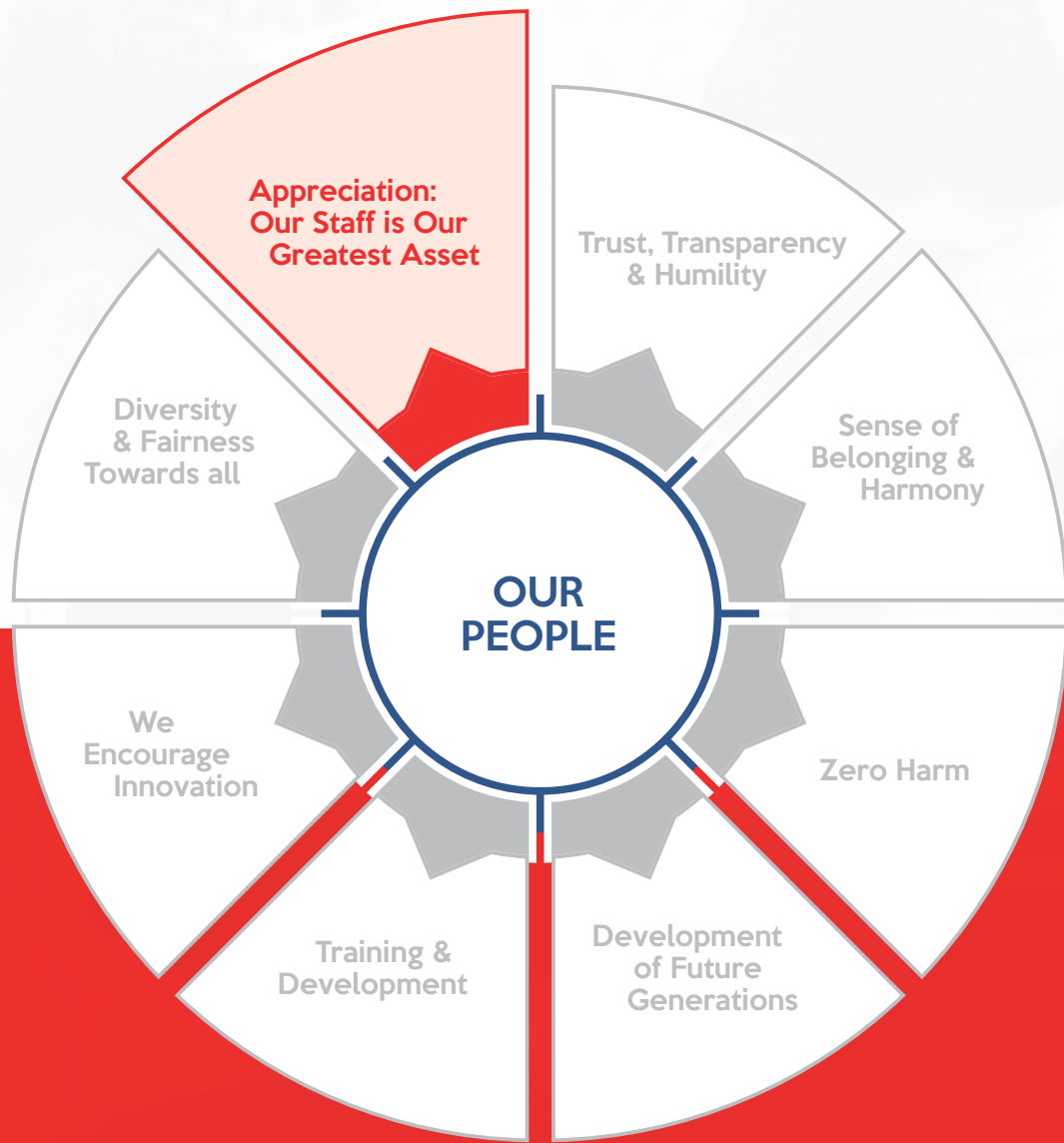
OUR PEOPLE



OUR PEOPLE INTRODUCTION

The Code of Conduct & our People outlines CCC's values and objectives for both Our company and our employees. CCC's growth and development is rooted in the respect and appreciation embedded in-between our workforce and their relationship with the company at large.

The dedication and professionalism of managers and employees dictates the fundamental foundations vital for achieving CCC's success and objectives. Every employee must ensure compliance with The Code in their daily activities.



OUR PEOPLE

APPRECIATION OUR STAFF IS OUR GREATEST ASSET

We are committed to developing our people and helping them achieve their best both personally and professionally.

CCC employees are treated with dignity, respect, and fairness. Our framework here at CCC is set up for fair and equitable compensation for every employee.

We foster a positive working environment, which sets our teams up for success. Safe and healthy working conditions are at the forefront of our business.

Respect, dignity, fairness and equality are the principles adopted towards employees here at CCC. Respect at the workplace is vital to establishing a successful and healthy work environment. Mutual respect between employees and managers at work increases employees' productivity and enables employees to know that they are valued for their abilities, qualities and professional merits.

Employee development and training is at the forefront of our business. We value training as a strategic tool for CCC's continuous growth, productivity and ability to retain valuable employees. Our employees are encouraged to learn and grow to constantly develop and upgrade their skills. Each employee is entitled to fair and respectful treatment at all levels, and to continuous career development and advancement based on their acquired qualifications.



OUR PEOPLE

TRUST, TRANSPARENCY & HUMILITY

CCC is committed to maintaining a culture where trust is the basis of all our actions and the guiding principle behind all that we do.

We expect our employees to perform their tasks ethically and in full integrity and professionalism and to maintain modesty, trust and transparency in all our endeavors.



OUR PEOPLE

SENSE OF BELONGING & HARMONY FOR ALL COMPANY EMPLOYEES

We are proud to emphasize that our company culture is not only exceptional, but also vital to CCC's continuous progress and resilience. CCC's impeccable achievements were not attained by mere luck but by unrelenting hard work. Nevertheless, the decisive factor all through the decades manifests itself in the set of unique cultural traits that define CCC. The distinctive culture embedded in CCC is based on family values of integrity, loyalty, humility and honesty.

The sense of belonging employees experience and the prevailing family atmosphere, inevitably leads to a stimulating, vibrant and dynamic environment, despite its geographical spread.

CCC is a second home to all CCC family members. It is not only a workplace but a setting through which the company manifests its long-term commitment to its employees and their families and expects all employees to act as in a big family, adopting CCC's culture.



OUR PEOPLE

HEALTH, SAFETY, ENVIRONMENT AND SECURITY (HSE&S)

Ensuring our employees' health and safety is our primary goal. CCC has made health and safety a priority for many years, and we remain determined to constantly enhance our safety strategy and provide the best protection to our staff.

CCC's Health, Safety, Environment (HSE) management system aims to provide the framework and tools to manage evolving HSE innovations quickly and easily while meeting the high standard of HSE performance and expectations both nationally and international regulatory authorities.

Serving and ensuring a healthy and safe working environment is crucial for our employees. CCC aims to avoid injury to any person, damage to equipment or property or any harm to the environment as a result of company activities.

Since 2004 the HSE Group has developed an internationally recognized and certified HSE Management System (OHSAS 18001) that meets the needs of the ever-changing HSE standards across all operations.

CCC ensures that their employees' health & safety at work is respected, managed and provided for. Appropriate policies and procedures must be strictly adhered to. It is our duty to create a safe environment to prevent accidents and injuries to ourselves and our colleagues.

“We believe that nothing is more precious than human life and well-being and ensure that all conceivable measures are taken when we conduct our business to strictly comply with the highest international health and safety standards for achieving the ultimate goal of protecting human life.”

- We aim to safeguard CCC's HSE values of zero accidents, no injuries, minimize illnesses and no harm to people.
- We fully comply with all legislations related to HSE&S.
- We provide all resources & manpower needed to effectively implement the HSE&S policy.
- We develop, communicate and implement certified and internationally recognized HSE&S management systems.
- We monitor and evaluate the HSE&S management system continuously for continual improvement.
- We provide all employees with mandatory HSE&S induction & training and develop their skills and competencies so as they are able to work safely and efficiently.
- We provide all workers and personnel with decent accommodations and welfare facilities to ensure the well-being of all employees and partners.
- We develop and implement effective hazard identification, communication and rectification systems in order to eliminate or minimize hazards to levels as low as reasonably practical.
- We continuously maintain a positive safety-culture through proactive initiatives.



OUR PEOPLE

HUMAN RESOURCES

Employees are CCC's most valuable asset. The dedication and professionalism of managers and employees represents their fundamental foundation for achieving CCC's objectives. CCC ensures that all employees receive fair treatment based on merit and without discrimination based on sex, religion or ethnic background.

CCC is committed to developing employees to their full potential; through optimizing the speed of their development by providing training and regular feedback, with a fast track for top performers.

CCC endeavors to maintain its youthful and dynamic nature by offering graduates a challenging and stimulating long-term career. The continuous recruitment of high caliber young graduates is central to CCC's success.

We are Committed to the Development of Future Generations

Opportunities for individual advancement are numerous and the company structure gives junior staff unparalleled access to seniors within the firm. International experience is actively promoted within CCC with mobility of staff between various geographic locations. This ensures that experience in one country is quickly disseminated to other countries. A "best practice" is achieved across international boundaries. While the majority of its construction business is in the Middle East, yet CCC like all leading construction companies, has a strong international presence demonstrated by the number of projects being executed in various locations, the diversification of its clients and the nationality of its staff. From various offices, CCC has completed numerous projects in over forty countries and currently has employees from over eighty different nationalities - "INTERNATIONAL" is truly at the core of CCC.

CCC has developed comprehensive hands-on training programs as well as online learning tools for all employees within the firm. Learning through rotation on various assignments is often practiced and those able to rise to the demands find that in a very short space of time, they are able to operate effectively in various positions.

- We ensure fair treatment of all staff.
- We support the smooth mobility of staff.
- We welcome fresh graduates.
- We offer opportunities for international experience. We develop training programs.



OUR PEOPLE

TRAINING & DEVELOPMENT

CCC has always regarded training as of utmost importance to the development of its staff and has strived to always go one step further.

Extensive training workshops are held annually - mostly in house -by qualified and certified CCC instructors and experts (in Technical, Project Management, Leadership, IT, Health, Safety and Environment, Quality and other topics). CCC's full time in-house instructors carry out training sessions at all offices in technical, leadership and project management areas.

Moreover, CCC has earned the status of a "Global" Registered Education Provider by the U.S. based Project Management Institute (PMI), which is known for its expertise in project management worldwide. All management courses offered by CCC are approved by PMI and provide participants with the widely recognized Professional Development Units (PDUs) for the purpose of applying for and maintaining the various management certifications.

In numerous cases, we partner with renowned external training providers that have proven record of excellence in a global business environment (such as INSEAD, Construction Industry Institute (CII) at Texas Austin, University of Texas, the US Green Building Council (USGBC), American Society for Quality (ASQ), City and Guilds, International Labor Organization (ILO), the Hay Group, Education For Employment (EFE) Foundation, the British Council, Coursera and the American Society for Training & Development (ASTD) among others.

The membership with the U.S. Green Building Council (USGBC) aims to promote the LEED certification in Leadership in Energy and Environmental Design. These partnerships help to offer our staff a higher level of specialization whenever the need arises. The training schemes we apply are flexible to allow our personnel to take the courses that best fit their learning needs and professional development requirements.

OUR PEOPLE

WE ENCOURAGE LEARNING AND INNOVATION

The knowledge management platform is a unique function for CCC that provides a diverse and geographically spread platforms for collaboration, expertise sharing and knowledge platform reuse among CCC employees.

Knowledge and experiences are shared on a CCC web-based portals for employees to communicate, collaborate, connect to experts, participate in communities of practice and receive professional advice.

The platform currently serves all employees within CCC as well as the organization's joint venture and partners.

We build a culture of innovation that exposes project teams to different points of view and help them apply new techniques (examples: the use of drones and 3D printing within the group's operation, Net Zero Carbon, mobile accommodation units and manufacturing applied capabilities improving efficiency & artificial intelligence).

- We collect best practices and promote their consistent use across the organization.
- We encourage the CCC's transformational digitalization journey and identify opportunities for improvement.
- We apply time management to all our projects.
- We improve project quality through training and access to expertise.
- We created the Knowledge Management "Fanous" platform, by asking members to suggest new methods and technologies that could enhance CCC operations and communities.



OUR PEOPLE

DIVERSITY & FAIRNESS TOWARDS ALL

CCC's uncompromising commitment to our workforce indicates that all employees are treated with dignity, respect and transparency.

We consider diversity as one of our competitive advantages. A key aspect of this competitiveness is our global and diverse workforce that encompasses employees from many different cultural backgrounds.

Since the initiation of CCC, we have completed projects for clients from different backgrounds and origins; the goal is for our workforce to reflect this same diversity.

CCC boasts workforce from more than 85 different nationalities, peaking at a total of 165,000 strong workforce, working at different locations and projects in 40 countries - spanning the Middle East to Africa and as far as Papua New Guinea and Australia.

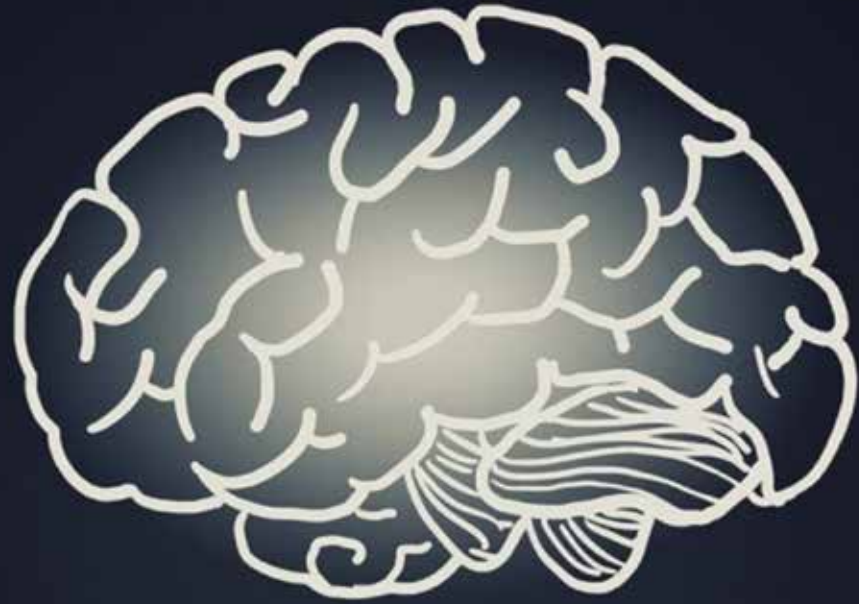
One fundamental part of our recruitment policy has always been to recruit local staff.

We ensure fair treatment to all our employees.

We combine international human rights principles with traditional family values to provide an atmosphere of safety, stability, compassion and equal opportunity for our employees.

CCC embraces the ambitions and welfare of over 165,000 employees, composed of more than 85 nationalities, in almost every country of the Middle East, Africa, Europe (including Russia), CIS countries, the Caribbean, Australia and Papua New Guinea.





OUR PEOPLE LESSONS LEARNED

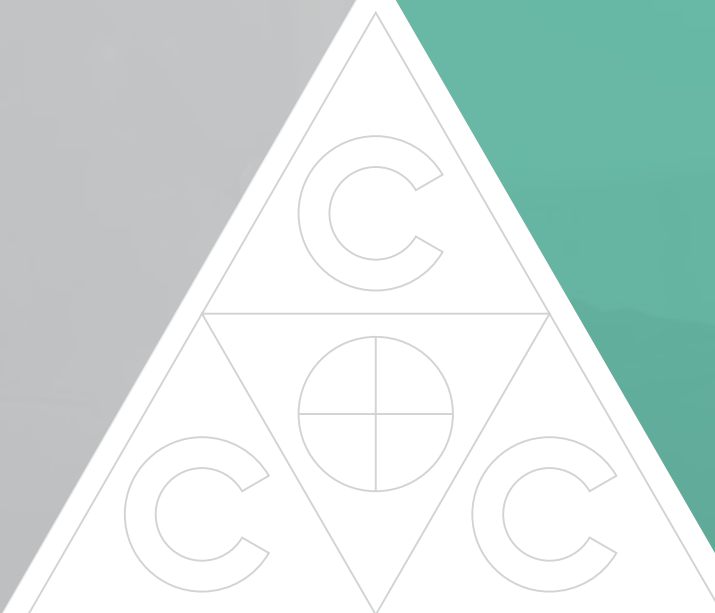
Lessons learned covers all aspects, positive or negative, that CCC has encountered in all business activities and deemed useful for the organization, projects or departments to learn from.

Lessons learned items resemble CCC's acquired experience throughout the past years in the contracting industry. It is aimed at augmenting, enhancing and standardizing group performance and project execution as well as improving productivities.

These are recorded for future information and referenced for all relevant CCC staff. Lessons learned are captured and shared within CCC, as well as other business partners in a controlled manner.

- We aim to strengthen cross-functional engagement across the CCC group business.
- We incorporate lessons learned into existing methodologies, processes, procedures and training.
- We Communicate with Project Managers and other department heads regarding the Lessons Learned input.
- We introduce programs as deemed necessary.

OUR
BUSINESS
INTEGRITY &
HONESTY





OUR BUSINESS INTEGRITY & HONESTY

INTRODUCTION

We value integrity & honesty beyond compliance. The Code outlines CCC's respect to business integrity & honesty where we hold ourselves accountable for our actions.

We honor our commitments at work and value our commitment to colleagues, clients, partners and affiliated companies. We assign defined goals and link them to personal responsibility and rewards.

- We act with honesty, integrity, trust and fairness to all our employees.
- We adhere to highest ethical standards.
- Trust and loyalty are ingrained in who we are.
- We recruit qualified and talented individuals that hold the same core values and integrity.

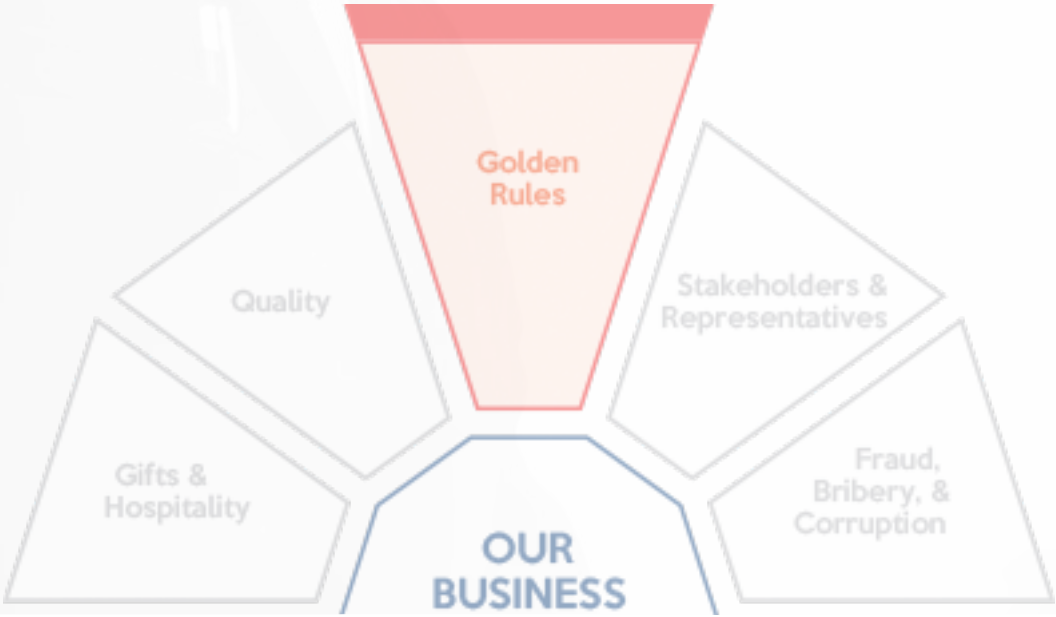


OUR BUSINESS INTEGRITY & HONESTY

THE RULES OF CONDUCT SUPPORT POSITIVE CHANGE

The golden rules are based on promoting ethics and compliance by providing principles of honesty, integrity, competence, respect, and responsibility. Serious breaches of the rules are likely to result in disciplinary action; minor issues can be resolved internally. In CCC, we model ethical conduct in all areas of our work and provide principles of conduct as a foundation for confidence in balancing stakeholders' expectations. Below are the four principles that set CCC's golden rules:

- We treat everyone with respect.
- We act with integrity and comply with our work obligations honestly.
- We only undertake work that we have the knowledge, skills, and resources to carry out.
- We show accountability through taking responsibility for our actions and act to deter wrongdoing.



OUR BUSINESS INTEGRITY & HONESTY

ANTI-CORRUPTION RULES

We should always act honestly and without deception and should take all possible steps to ensure that We are not involved, whether directly or indirectly, in any activity involving corruption.

- Always act honestly, without deception and take all possible steps to ensure that we are not involved, whether directly or indirectly, in any activity involving corruption.
- Must not get involved in offering, paying, requesting, or receiving bribes or other improper advantage.
- Must not get involved in any fraudulent, dishonest, or deceptive activity.
- Must not get involved in any activity linked to conflict of interest.
- Must not provide, conceal, or approve work, materials, equipment, or services which are not of the quality and quantity required under contract.
- Must not authorize, expressly or impliedly, any activity involving corruption.
- Must not provide false, inaccurate, or misleading information.
- Must not dishonestly withhold information nor disclose any information that could be in breach of confidentiality or non-disclosure policies.
- Must not make or submit false, unsubstantiated, inaccurate, misleading records, invoices, claims, applications for variations or extensions of time, or requests for payment.
- Must not dishonestly refuse or fail to approve, or delay in approving, work, materials, equipment, services, invoices, claims, applications for variations or extensions of time, or requests for payment.
- Must not dishonestly refuse or fail to pay, or delay in paying, sums correctly due.
- Must not participate in any activity which could facilitate corruption. Such activity may include authorizing payment of bribes, drafting illegal agreements, drafting fraudulent claims, falsifying evidence, and giving false evidence in legal proceedings.
- Must not assist in the concealment of any activity involving corruption. This means that one must not take any positive steps to conceal the corruption.
- Must not commit corrupt activity because we have been requested to do so by a Senior Manager.
- Must not unduly influence or interfere with the function of the Auditing Teams and must truthfully answer all inquiries made by them.



OUR BUSINESS INTEGRITY & HONESTY

STAKEHOLDERS & REPRESENTATIVES FAIRNESS TO ALL STAKEHOLDERS

CCC's culture maintains relationships which are based on honesty, transparency and professional integrity; maintaining the trust and confidence of the group their stakeholders and representatives..

CCC's stakeholders include all third parties' customers, partners, suppliers, contractors, subcontractors, governments, regulators and the communities in which we operate.

Our stakeholders must comply with applicable laws, respect social culture and execute projects sincerely in all regions where CCC operates.

CCC's long-term strategy ensures mutual understanding and trust is developed between suppliers, partners, contractors and subcontractors to maintain a healthy and long-lasting relationship.

- We develop and nourish long-term relationships and sustain a strong and constructive atmosphere.
- We recognize the importance of our partners, society, and other interested parties in the business.
- We meet our obligations and responsibility.
- We regularly evaluate our own performance and the performance of others.
- We keep our promises and fulfil contractual obligation and agreements openly and honestly.
- We communicate truthfully, clearly and regularly.
- We solve disputes at the earliest stage.
- We comply with all laws and regulations in the countries in which we operate according to our internal rules and policies.





OUR BUSINESS INTEGRITY & HONESTY

FRAUD, BRIBERY & CORRUPTION

WE ARE COMMITTED TOWARDS ANTI-CORRUPTION

Integrity and accountability are at the core of CCC's culture. CCC fosters a robust environment of accountability, rooted individual refusal to engage in any forms of corruption, fraud and bribery. This applies to CCC directly and all third parties with whom we may associate. Fraud, bribery and corruption are prohibited in all activities. It is banned to offer, give, or receive bribes or improper payments. Allegations of corruption and bribery causes serious reputational risks and damage to CCC and harms our workplace.

We operate in the market with the trust and respect of all our employees, contractors and third-party entities, who rely on us to prohibit all forms of corruption.

- We ban all attempts to negatively influence others, misrepresent a situation or exploit individuals.
- We prohibit the use of positions of power to gain unfair or personal advantage.
- We educate our staff through anti-bribery training programs and ensure that dishonesty, corruption and fraud are prohibited.



OUR BUSINESS INTEGRITY & HONESTY

ACCURATE RECORDS & FINANCIAL AWARENESS

CCC books & records of accounts and operations must accurately reflect each transaction recorded therein. No false or misleading entries should be made in the books and records for any reason.

Project reporting is part of our accounting records. If your responsibility involves the preparation and maintenance of accounting records of any kind, you must adhere to the guidelines set out in the Ethics & Compliance Program and business guidelines laws and regulation of the country of operation.

- We maintain and present financial records in accordance with the laws of each country we operate.
- We comply with internal financial controls and only process transactions in accordance to applicable policies.
- We record transactions accurately in the proper accounting period supported by appropriately detailed evidence.
- We comply with any applicable document retention and disposal policies.



OUR BUSINESS INTEGRITY & HONESTY

RISK MANAGEMENT

CCC's risk terminology is an integral part of the daily activities which include conducting and recognizing challenges at all levels.

Risks are defined as the outcome of and not by uncertain events with potential impact on the group's objectives. CCC constructed a structured Risk Management System which identifies potential risks and effectively mitigates the impacts.

CCC's culture ensures that all its team members across the various projects, spectrum and expertise share a common understanding of risk management.

Assessing, mitigating, monitoring & reviewing risks within CCC's diversified infrastructure business segments, highlights potential risks that can negatively impact project deliverables.

- We protect CCC's reputation and assets.
- We support our staff's aims in fulfilling their roles and delivering their objectives.
- We provide risk management awareness training.
- We implement a periodical risk review at all levels in the organization.
- We maintain transparent & constructive input with no blame approach.
- We implement proactive rather than reactive management of risks' consequences and exposures.
- We embed risk management in our operations and processes.
- We clearly identify and evaluate risk exposures.
- We improve awareness of risk management principles and techniques across CCC's group.



OUR BUSINESS INTEGRITY & HONESTY

INTERNAL & EXTERNAL AUDITS
WE VALUE INTEGRITY, HONESTY & TRANSPARENCY

INTERNAL AUDITING

Our internal audit is the independent assurance and consulting service designated primarily in ensuring compliance with key corporate procedures and the group's levels of authority.

Safeguarding of CCC's economic assets allows efficient utilization of resources, accurate records, reliability and integrity of information. Unconditional access to all company records is necessary for the performance of audit engagements.

EXTERNAL AUDITING

Our external auditors are independent assurance and are designated primarily in ensuring compliance with corporate international standards and legislations.

Safeguarding the company, external auditors have full and complete access to all records required for the conduct of their mission in ensuring efficiency, transparency and reliability of CCC's integrity in CCC.



OUR BUSINESS INTEGRITY & HONESTY

CONFLICT OF INTEREST

CCC is committed to impartiality and objectivity in making the best possible business decisions for the group and all those who associate with us. In matters related to CCC projects or partners, if there is any potential of conflict of interest or lack of objectivity, immediately notify your line manager and the Ethics & Compliance department to protect yourself and CCC by acting quickly and ensuring you maintain a professional distance if there is potential for risk.

- You must avoid situations of close relationship with a public official, client representative or a third party that could influence selections or approvals leading to personal gain.
- You must avoid close relationship with a potential supplier or subcontractor. You may not evade these requirements by acting indirectly through anyone else, such as your family, friends or relatives.
- You may not disclose any information related to CCC projects, services or operations to competitors.
- You must seek approval from your line manager before sharing any information regarding CCC with third parties.
- You must avoid holding a second employment in a similar or related sector.
- You must avoid conflicting responsibilities.
- You must follow the Ethics & Compliance Program guidelines/criteria to conflict of interest.

OUR BUSINESS INTEGRITY & HONESTY

INFORMATION MANAGEMENT SYSTEM & COMPUTER INFRASTRUCTURE



We comply with applicable privacy and data protection, disclosures and confidentiality laws. CCC's Information Management System department facilitates a dynamic communications center, which includes the use of various in-house and outsourced applications as a support mechanism to enhance the internal and external operations of the group.

We should all assume that any information stored or communicated on the company's computer systems is company property, complying with the country of operation data protection laws and regulation.

- We adhere and follow the policy of the Information Management Department that defines what can be performed, stored and accessed throughout CCC's information technology resources.
- All IT related company property complies with the country of operation data protection laws and regulations.

OUR BUSINESS INTEGRITY & HONESTY

GIFTS & HOSPITALITY

To safeguard CCC's reputation, the exchange of money or services must be conducted openly and transparently with approval of the line manager. Approval and written permission from the company must be obtained if any gift exchange, beyond the ones listed below, is to take place.

To foster goodwill or working relationships employees may occasionally receive or offer gifts or hospitality. Hospitality includes invitations to social functions, sporting events, meals and entertainment.

Low value gifts associated with customary appreciation are acceptable. Such gifts must be reasonable and must comply with the Ethics & Compliance Program guidelines.

- Ensure that any gift or hospitality offered, received, or declined is recorded on our register.
- Ensure compliance with financial limits and approval requirements as set out by the Ethics & Compliance Program.
- Confirm with the Ethics & Compliance Department coordinators before offering any gift or hospitality.
- Verify with clients before offering any kind of gift or invitation in-case they have different rules.





OUR BUSINESS INTEGRITY & HONESTY

QUALITY

Quality in CCC is based on mutual understanding. It recognizes our valuable customers' repeated satisfaction through the delivery of quality products and services specified in the contract.

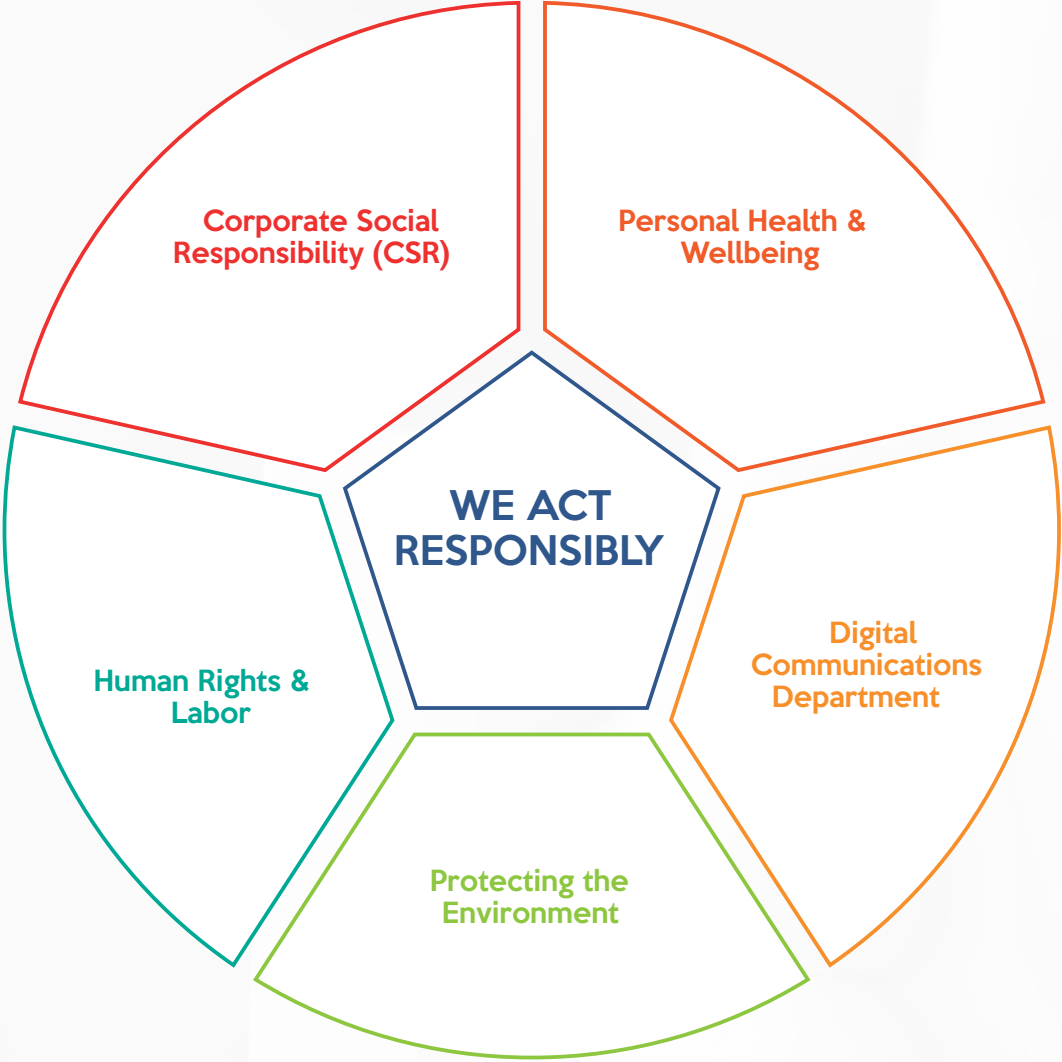
Our duty is to exercise due care in working towards these objectives and meet customer requirements on time and within budget which is critical to the ongoing success of the group.

Our quality standards have been established throughout the group with a framework for reviewing and measuring our quality products and services to provide a competitive advantage for the group within the industry.

- We deliver projects to our customers to the highest standard of quality, functionality and durability.
- We ensure that resources are used to maximize efficiency, which enhance the company image and profile in the marketplace.
- We apply the best possible technology in the industry to comply with the agreed requirements and continually improve the effectiveness of the quality management system.
- We developed an evolving work culture that is based on continuous improvement by involving employees at all levels of the organization.
- We appreciate our employees and their contribution to the achievement of our goals and objectives.
- We are committed to achieving the highest level of cooperation.
- We are dedicated to maintaining transparency in all phases of our operations and those which include engineering, procurement and construction.
- We value and plan our work in a way that allows us to be benchmarked for quality and safety standards.
- We ensure accurate records, procedures, manuals and data are made available to managers and employees by document control.



WE **ACT** RESPONSIBLY



WE ACT RESPONSIBLY

INTRODUCTION

We act responsibly, ethically and make decisions with integrity. We are open, genuine and transparent in our work.

We engage in the highest standards of ethical conduct and workplace behavior and are committed to legal compliance and ethical business practices in all our business operations worldwide.



WE ACT RESPONSIBLY

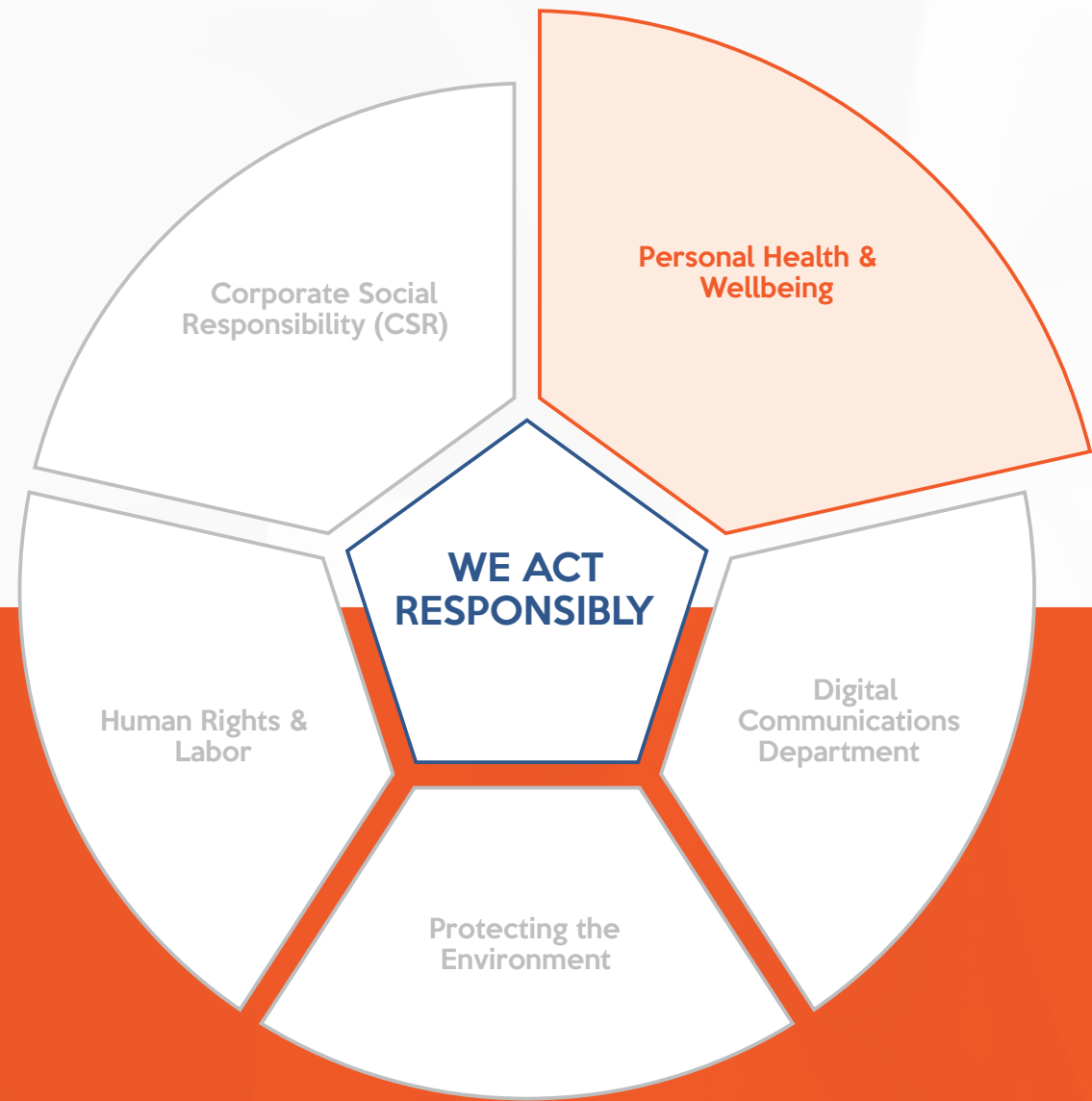
CORPORATE SOCIAL RESPONSIBILITY (CSR) COMMITMENT TO CHANGE FOR THE BETTER

CCC's Corporate Social Responsibility (CSR) undertakes the role of "corporate citizenship" to ensure that business values and behavior develops the company's business as well as improving the quality of life of its stakeholders, workforce, clients, partners, subcontractors, communities and societies at large.

Our commitment is to contribute to the welfare of our employees. We aim to increase awareness amongst our employees towards economic, social and environmental sustainability of communities where CCC conducts its business. CCC's CSR community development strategy includes developing cooperation with governmental organizations (GO's), and non-governmental organizations (NGOs) to build and implement impactful community projects, employee welfare activities and promote the engagement of volunteering in local activities.

COMMITMENT TO THE COMMUNITY

- We research and assess the social, economic and environmental needs of local communities in which CCC operates.
- We determine the potential impacts of new projects during their planning and review of on-going projects to ensure that social responsibility is still being addressed.
- We identify and develop partnerships and agreements with local government and civil society organizations to build and implement socially sustainable projects.
- We encourage the culture of volunteerism amongst staff and engage them and their families in giving back to society through their participation in volunteering activities in accordance with CCC's Volunteering Policy. The Policy allows full time employees 20 hours (per calendar year) of time off work as volunteers.
- We encourage team- building activities which focus on the integration of social responsibility throughout the organization.
- We offer In-kind contributions - organizing or participating in humanitarian relief campaigns and carry out donation drives for disaster relief and poor communities.



WE ACT RESPONSIBLY

PERSONAL HEALTH & WELLBEING

A healthy workplace is a happy and productive one. Here at CCC, we recognize that employee well-being is critical to our success. For many, work is where we spend a major part of our lives. Through positively impacting employee health and wellbeing, we empower our people to achieve the best version of themselves and help them to better cope with stress. CCC supports a positive physical and mental health environment for employees, colleagues, managers and employers to enable them to thrive.

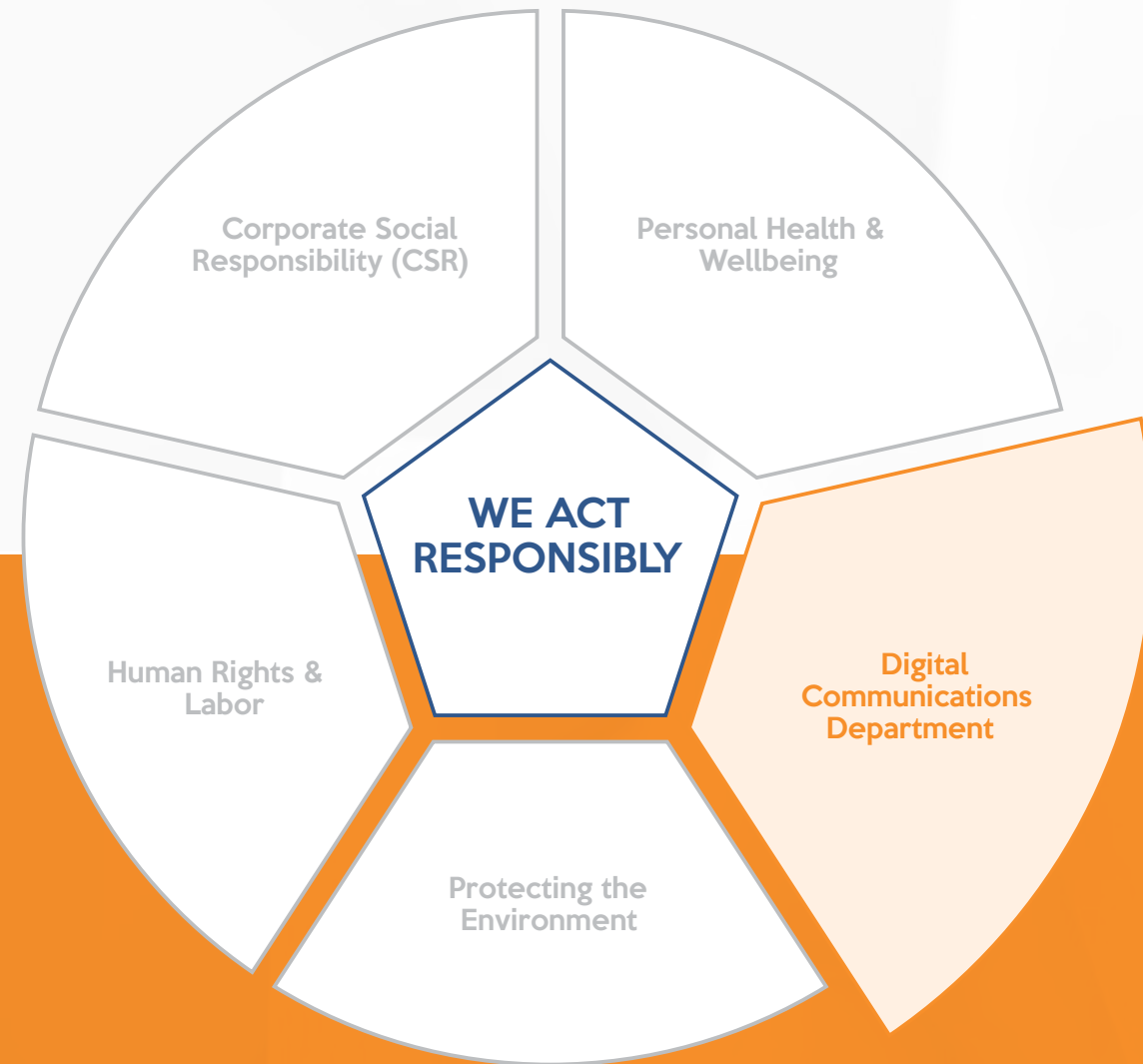
CCC has put in place effective workplace programs and policies which reduce health risks and improve the quality of life for their employees globally. We provide an employee-centered culture of wellness and a supportive environment where health is ensured and employee safety comes first. We continuously support, improve and monitor our employees' environment, their physical and mental health and their personal development, while preserving our values.

ALCOHOL / DRUGS FREE WORKPLACE

Working under the influence of alcohol or drugs is extremely dangerous as it can increase the risk of an accident. CCC's company policy maintains an alcohol and drug-free environment for our employees who are our most valuable assets. The possession, use, consumption distribution or sale of alcohol and illegal substance in the workplace is strictly prohibited. CCC's policy will provide measures that employees will face for violating CCC's Alcohol/Drug free workplace policy.

SMOKING FREE WORKPLACE

Workplace smoking is a serious safety and health hazard and often causes conflict between employees. All managers and employees who smoke are encouraged to give up the habit. CCC implements a strict smoke and vape-free work environment to create a healthy and safe workplace. Employees who violate this policy will be subject to disciplinary action up to and including immediate discharge.



WE ACT RESPONSIBLY

DIGITAL COMMUNICATIONS DEPARTMENT

The Digital Communications Department is responsible for overseeing a wide range of communications activities which vary from internal to external communications, media, public relations, marketing and crisis management. The department aims to protect CCC's online reputation and ability to do business. Our Digital Communications Department is composed of an online team with quick and productive access to a virtual cloud-based collaborative platform for quick and efficient solutions.

CCC's Digital Communications Department works closely with other departments to ensure information about the company is communicated both internally within CCC and to external audiences accurately and efficiently. We aim to implement policies to strengthen inter-departmental communications which help to maintain an efficient flow of information through CCC.

The department follows current trends and innovation in the digital age and evaluates the effective use of social media channels to support CCC's online reputation. Members of the Digital Communications Department generate various marketing materials and general customer communications, including:

- CCC's Quarterly Bulletin.
- Knowledge Management Platform.
- CCC's Website.
- Press Releases.
- Social Media outlets including LinkedIn, Facebook and Instagram.



WE ACT RESPONSIBLY

PROTECTING THE ENVIRONMENT

CCC is committed to reducing our environmental emissions and lowering our carbon footprint while increasing our energy performance. We are dedicated to understanding how our growth can better interact with the welfare and development of the communities, ecologies and economies wherever we operate.

CCC's sustainability strategy is based on the pillars of sustainable development: Economy, Environment and Society. Guided by CCC's distinctive culture, the company manifests its long-term commitment on the basis of responsible growth and respect towards people and the environment.

- We establish procedures to monitor and disclose sustainability performance.
- Our sustainability key performance indicators (KPI's) are grounded by internationally recognized standards (Global Reporting Initiative (GRI), UN Global Compact).
- We follow the Greenhouse Gas (GHG) protocol standards for the Carbon Footprint Inventory.
- CCC's sustainability activities, measurements and progress in achieving targets are published in our standardized sustainability reports.
- We strive to effectively understand and manage the environmental impacts of our day to day operations and project execution. The key areas we focus on are:
 - ↳ Energy and Emissions
 - ↳ Water and Wastewater
 - ↳ Waste Management
 - ↳ Material Management

WE ACT RESPONSIBLY

HUMAN RIGHTS & LABOR PROTECTING HUMAN LIFE IS OUR GOAL

As an employer CCC recognizes employee well-being and safety as a top priority. The extremely low turnover ratio we have achieved through the years bears witness to the strong employee satisfaction with the company's care for the welfare of its members.

CCC upholds and respects the Universal Declaration of Human Rights (UDHR), the historic declaration adopted by the United Nations General Assembly on 10 December 1948. In its work-related Article 23, the declaration highlights everyone's right to "favorable conditions of work".

In our reporting we have already mapped the Global Compact's Principles to the SDGs and the GRI G4 indicators taking full advantage of UN's relevant toolkits.

In the context of construction, favorable work conditions significantly relate to:

- Good worker accommodation facilities.
- Clean food and proper hygiene,
- High quality safety standards on our project sites.



COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

The Code of Conduct & Commitments, Partnerships & External Resources, outlines CCC commitment to the UN Global Compact, and sustainable development goals (SDG's).



COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://www.unglobalcompact.org/>



THE UN GLOBAL COMPACT (UNGC)

The UN Global Compact is a leadership platform for the development, implementation, and disclosure of responsible and sustainable corporate policies and practices. Launched in July 2000, the platform seeks to align business operations and strategies everywhere with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption. CCC became a signatory of the UN Global Compact (UNGC) on March 1, 2001 to streamline and align its business practices with the ten principles and report on them, as well as to build partnerships with various civil society organizations, and communities in developing corporate social responsible initiatives and projects that will improve the wellbeing of communities in which it operates.





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://sustainabledevelopment.un.org/sdgs>



SUSTAINABLE DEVELOPMENT GOALS (SDG's)

Launched in 2015, the SDG's were introduced as the action plan of the transformative 2030 Agenda for Sustainable Development. The 17 universal goals address urgent global challenges such as poverty, education, gender equality, water and energy use, climate change and sustainable economic growth. Recognizing that the private sector will determine the success of the SDGs, the UN has explicitly invited corporate actors to tackle these challenges with innovation and creativity.





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://www.transparency.org/en/>

TRANSPARENCY INTERNATIONAL

CCC is a member of the Business Integrity Forum of Transparency International Greece.

Transparency International’s mission is to stop corruption and promote transparency, accountability and integrity at all levels and across all sectors of society. Our Core Values are: transparency, accountability, integrity, solidarity, courage, justice and democracy.



WE HAVE ONE VISION, A WORLD FREE OF
CORRUPTION



**TRANSPARENCY
INTERNATIONAL**
the global coalition against corruption



COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<http://www.gbchealth.org/>



GLOBAL BUSINESS COUNCIL ON HEALTH (GBC HEALTH)

GBC Health serves as a hub for private sector engagement in the world's most pressing global health issues. Since 2001, GBC Health has worked with hundreds of members – individually and in partnership with one another – to tackle the challenges of HIV/AIDS, tuberculosis, malaria, diabetes and other health issues facing the workplace and communities where business is conducted.





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://www.weforum.org/communities/partnering-against-corruption-initiative>



PARTNERING AGAINST CORRUPTION INITIATIVE

PACI, A World Economic Forum initiative, that is designed to serve as a platform for sharing experiences and best practices.

PACI also leads cross-industry collaborative campaigns, working with business leaders, governments and international organizations.

PACI



COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://www.efe.org/>



EDUCATION FOR EMPLOYMENT (EFE)

Education for Employment is a non-governmental organization in the Middle East & North Africa (MENA) with a mission to create economic opportunities for unemployed youth in the MENA. EFE helps young women and men through demand-driven training programs that link them to the world of work while creating opportunities for them to develop their professional skills, build social capital and engage in their communities. CCC helped to launch EFE and has partnered with it on various levels including providing them with program support, designing curriculum for training programs, and hiring EFE alumni in Palestine, Jordan, Yemen, and Tunisia. CCC also serves on EFE's Global Board and MENA's Region Board.





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<http://www.encord.org/>



THE EUROPEAN NETWORK OF CONSTRUCTION COMPANIES FOR RESEARCH AND DEVELOPMENT (ENCORD)

The European Network of Construction Companies for Research and Development (ENCORD) is a network of active members from the construction industry, represented by decision-makers and executives working on research, development and innovation and providing service to experts and the operational sides within the member companies. CCC's participation in the "Council" (since 2007) demonstrates its commitment to advance the discussion on research and development priorities and the development of the construction sector.





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://new.usgbc.org/>



U.S. GREEN BUILDING COUNCIL (USGBC)

Working to champion sustainability, CCC has become a member of the USGBC, the leading institution promoting sustainable building practices. This membership embodies CCC's commitment in sustainable development, a driver of green building innovation and a facilitator of more prosperous communities.

The USGBC is a private non-governmental organization that promotes sustainability in building design, construction and operation. USGBC is transforming how our buildings are designed, constructed and operated through LEED. USGBC's vision is that buildings and communities will regenerate and sustain the health and vitality of all life within a generation.





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://www.c5-online.com/ac-london/>



ANTI-CORRUPTION LONDON

Based in London, C5 is recognized as the market leader by major corporates, leading private practice law firms and regulatory bodies across Europe, the Middle East and Asia. C5 Anti-Corruption Portfolio offers 10+ cutting edge events as well as innovative executive roundtables all across Europe. The events bring together key enforcement officials to talk about global trends and priorities, Chief Compliance Officers, General Counsel, Head of Internal Audit and Outside Counsel, Compliance Professionals, Representatives of International Organizations, Investigators, Financial Experts, and others to participate in a dialogue on cross-border issues and best practices in controlling anti-corruption risks and responding effectively when problems are identified.





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://www.weforum.org/>



WORLD ECONOMIC FORUM

CCC is an industry affiliate to the World Economic Forum (WEF) which is an independent, non-profit organization that focuses its efforts to demonstrate entrepreneurship in the global public interest while upholding the highest standards of governance. Committed to improving the state of the world, the Forum believes that progress happens by bringing together people from all walks of life who have the drive and the influence to make positive change. It provides a platform for the world's leading companies to shape a better future.

Being an industry affiliate provides CCC with the opportunity to engage with a select companies that are shaping and transforming their industries in strategic and socially responsible ways and who come together through forum-hosted platforms to provide leadership, define the industry agenda and initiate change.





COMMITMENTS, PARTNERSHIPS & EXTERNAL RESOURCES

<https://www.pearlinitiative.org/>



THE PEARL INITIATIVE

CCC is a founding Partner of the Pearl Initiative. The Pearl initiative is a private sector-led not-for-profit organization set up to improve transparency, accountability and business practices in the Arab world. It is a growing regional membership network of business leaders committed to driving joint action and sharing knowledge and experience. The Pearl Initiative has been developed in cooperation with the United Nations Office for Partnerships.

As a Founding Member of the Pearl Initiative CCC endorses the importance of accountable, transparent and well-governed businesses. CCC supports the Pearl Initiative’s aims, initiatives and activities which include executive briefings and leadership training programs, corporate governance, anti-corruption, best practices and lessons learned in corporate social responsibility.





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