

1. Integrity Risk Management Framework / Code of Conduct

FATIMA has established an Integrity Risk Management Framework to provide a foundation for ethical conduct, accountability, and transparency across its operations and stakeholder relationships. The Framework sets out the governance, standards, reporting channels, and response mechanisms through which FATIMA seeks to prevent misconduct, manage integrity-related risks, and promote responsible business practices.

The Framework underscores FATIMA's commitment to:

- a. Upholding human rights, dignity, equality, and fair treatment
- b. Maintaining zero tolerance for bribery, corruption, fraud, retaliation, harassment, and discrimination
- c. Promoting responsible customer and supply chain relationships
- d. Embedding ethical risk management, oversight, and continuous improvement into business operations

The Framework applies to all internal and external stakeholders, including but not limited to directors, employees, third-party personnel, customers, suppliers and other business associates.

Its principal components are:

- Governance and oversight
- Directors, Employees, Customers, and Supplier Codes of Conduct
- Speak-Up ("Flag-It / TELL FATIMA") mechanism
- Risk assessment and control activities
- Investigation and disciplinary arrangements
- Monitoring, communication, training, and continuous improvement

1.1 Governance, Oversight and Accountability

FATIMA has established a governance structure to ensure effective implementation, oversight, and periodic review of the Integrity Risk Management Framework. Ethical conduct is promoted as a shared responsibility, with leadership expected to set the tone and stakeholders expected to act in line with FATIMA's values and standards.

The Board of Directors promotes an ethical culture and supports dissemination of the Code of Conduct and related policies.

The Ethics Committee plays a central role in administering the Framework. Its responsibilities include promoting a culture of integrity, updating related policies and processes, reviewing whistleblowing reports, overseeing investigations, monitoring fraud risk assessments and recommending remedial actions. Where appropriate, the Committee may involve subject matter experts.

1.2 Codes of Conduct

FATIMA's Codes of Conduct set minimum standards of ethical and professional behavior for key stakeholder groups. It guides decision-making, reinforces compliance with laws and company policies, leading practices and ensures that FATIMA's relationships are conducted with honesty, fairness, dignity, and respect.

1.2.1 Directors' Code of Conduct

FATIMA's Board of Directors' Code of Conduct sets out the standards of ethical leadership, professional conduct, fiduciary responsibility, independence, integrity and accountability expected from all Directors. The Code applies to all members of the Board, who are required to affirm compliance upon appointment and annually thereafter. Independent Directors are additionally required to comply with the applicable independence criteria prescribed under the Companies Act, 2017, the Listed Companies (Code of Corporate Governance) Regulations, 2019, the PSX Listing Regulations and other applicable laws and regulatory requirements.

The Code reinforces the Board's responsibility to set the tone from the top, uphold the Company's Mission, Vision and Core Values, and promote transparent, fair, responsible and sustainable governance. Directors are expected to act honestly, in good faith and in the best interests of the Company and its shareholders; exercise objective and independent judgment; devote adequate time and attention to Board and committee matters; participate diligently in deliberations; and maintain effective oversight of strategy, risk management, compliance frameworks, internal controls, financial reporting and ESG-related responsibilities.

The Code requires Directors to identify, disclose and appropriately manage actual, potential or perceived conflicts of interest, including related party transactions, outside directorships, affiliations, family interests or other relationships that may affect, or appear to affect, their objectivity. Directors are required to abstain from discussions, deliberations and voting on matters in which a conflict exists. Related party transactions are required to be disclosed, reviewed and approved through appropriate governance mechanisms, including review by the Audit Committee and Board approval, and where applicable, shareholder approval, in accordance with applicable laws, regulations and governance requirements.

Directors are required to protect confidential and non-public information, use such information only for legitimate Company purposes, avoid misuse of Company assets, information or influence, and refrain from exploiting corporate opportunities for personal benefit or for the benefit of third parties. They are also required to comply with applicable insider trading and securities laws, including restrictions on trading during closed periods or while in possession of unpublished price-sensitive information, and to ensure that required disclosures relating to their shareholdings are made within prescribed timelines.

The Code supports accurate, fair, timely and transparent financial, regulatory, shareholder and market disclosures. Directors are expected to safeguard the Company's assets, reputation and goodwill, and ensure that the Company conducts its affairs in compliance with applicable laws, regulations, statutory obligations and the underlying spirit of good governance.

The Code further reinforces FATIMA's zero-tolerance stance towards bribery, corruption and unethical business practices. Directors must not offer, solicit or accept improper payments, gifts or benefits, or exert undue influence over procurement, contracting or vendor selection processes. The Board is also responsible for ensuring effective oversight of whistleblowing mechanisms, internal reporting channels and protections for individuals who raise concerns in good faith. Directors are expected to report known or suspected

violations of applicable laws, regulations or the Code without undue delay and to support fair, objective and confidential reviews of alleged breaches.

The Code also addresses Board proceedings and collective responsibility, public communications, performance evaluation and periodic review. Directors are expected to uphold decorum, confidentiality, professionalism and collective responsibility in Board proceedings, and to refrain from making public statements or representations on behalf of the Company unless duly authorized. Established violations may result in appropriate sanctions, including regulatory referral where required. The Code is reviewed periodically to ensure its continued relevance, effectiveness and alignment with evolving legal requirements, regulatory expectations and governance best practices.

1.2.2 Employee Code of Conduct

FATIMA requires all employees and internal stakeholders to uphold the highest standards of ethical conduct, guided by its core values. The Employee Code of Conduct sets clear expectations for legal compliance, ethical decision-making, and responsible risk management.

Employees are expected to act honestly, identify risks within their roles, seek clarification where necessary, and report suspected violations in good faith. Managers carry additional responsibility for reinforcing ethical standards within their teams, supporting training and awareness, encouraging speak-up behavior, and maintaining confidentiality.

Human Rights

The Code places strong emphasis on human rights and respect for people, including alignment with the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organization. It prohibits harassment, intimidation, humiliation, discrimination, and workplace violence, and promotes diversity, inclusion, and equal opportunity in workplace interactions and employment decisions.

Compliance

Employees must comply with all applicable laws and internal policies, including those relating to insider dealing, transparency in reporting, conflict of interest, confidentiality, anti-money laundering, competition law, anti-bribery and corruption, and fair business conduct. FATIMA requires disclosure of critical relationships and potential conflicts, particularly where employees or their close relatives have interests or dealings that could influence objectivity or create a perceived conflict in relation to external stakeholders. Employees must also comply with FATIMA's Gifts and Hospitality Policy, including prescribed compliance reviews and must not offer or accept any gift or hospitality in contravention of the policy.

Anti-Bribery & Anti-Corruption

FATIMA maintains zero tolerance for bribery and corruption. Political contributions also form part of anti-bribery or corruption purview. Employees must not offer, give, seek, or accept bribes, kickbacks, facilitation payments, improper gifts, unlawful commissions, or any other undue advantage. Particular care is required in dealings with government officials, gifts and hospitality, third-party intermediaries, donations, sponsorships, and other situations that may give rise to corruption risk.

FATIMA understands that the exchange or provision of modest gifts may be an indication of fostering productive business relationships. However, such gifts must be associated with a legitimate business purpose, should strictly fall within the value and frequency limits and should not create an appearance of wrongdoing from a prudent point of view.

Anti-Money Laundering

Employees must also comply with anti-money laundering controls, due diligence requirements, and reporting obligations in relation to suspicious transactions or unlawful proceeds.

Confidentiality, HSE & Anti-Competitive Conduct

FATIMA also requires employees to protect confidential information, commercially sensitive data, and intellectual property, and to ensure that company records and public or regulatory disclosures are accurate, complete, fair, and timely. The Code also reinforces FATIMA's expectations regarding health, safety, environment, and corporate social responsibility. The Code further prohibits anti-competitive conduct, including inappropriate exchange of commercially sensitive information, price-fixing, bid-rigging, market sharing, or unlawful dealings with competitors.

1.2.3 Customer Code of Conduct

FATIMA expects customers to conduct business ethically, responsibly, and in compliance with all applicable laws, regulations, and relevant standards. The Customer Code of Conduct outlines minimum expectations and supports commercial relationships based on trust, fairness, transparency, and shared values.

Customers must comply with laws relating to business conduct, bribery, corruption, money laundering, and other regulatory requirements in the jurisdictions in which they operate.

Customers must not seek to improperly influence FATIMA employees or stakeholders for personal or commercial gain, or enter into arrangements that could adversely affect FATIMA's business, reputation, or relationships. FATIMA also expects customers to respect human rights, promote fair treatment, and maintain workplaces free from discrimination, harassment, and unsafe practices, while complying with laws relating to wages, working hours, minimum age of employment, and workplace health and safety.

Customers are also expected to maintain accurate records, protect confidential information, respect FATIMA's intellectual property rights, avoid insider dealing, and ensure transparency in financial and business dealings. They must disclose any relationship, personal interest, or financial connection involving FATIMA employees or associated companies that could give rise to a conflict of interest.

In addition, customers are expected to comply with FATIMA's requirements regarding gifts and hospitality, protect FATIMA's products and confidential information from misuse or counterfeiting, refrain from making unauthorized public or media statements on FATIMA's behalf, and cooperate fully in any review or investigation of potential violations. FATIMA reserves the right to monitor customer compliance and take corrective action, including termination of the business relationship, where serious violations occur.

1.2.4 Supplier Code of Conduct

FATIMA expects suppliers, contractors, service providers, and other supply chain partners to comply with high standards of legal, ethical, social, and environmental responsibility. The Supplier Code of Conduct applies to suppliers and, where relevant, to their employees, agents, subcontractors, and other representatives.

Suppliers must comply with all applicable laws and regulations in the jurisdictions in which they operate, while also adhering to FATIMA's ethical expectations. The Code places strong emphasis on human rights and labor standards, including dignity, fair treatment, safe working conditions, and compliance with internationally recognized norms and principles.

Suppliers must prohibit forced labor, bonded labor, child labor, human trafficking, and modern slavery, and ensure that all work is voluntary. FATIMA also expects suppliers to avoid confiscating workers' identity documents, charging unlawful recruitment fees, or sourcing raw materials and products through exploitative or conflict-related practices unless responsibly sourced. Suppliers are also expected to uphold fair wages, lawful working hours and benefits, freedom of association, non-discrimination, humane treatment, and appropriate health and safety protections for workers.

The Code requires suppliers to maintain integrity in all business interactions and comply with laws and controls relating to anti-bribery, anti-corruption, money laundering, fair competition, gifts and hospitality, insider trading, export controls, and sanctions. Bribes, kickbacks, extortion, embezzlement, and other improper means of obtaining advantage are strictly prohibited.

Suppliers must also disclose actual or potential conflicts of interest, maintain accurate records, protect confidential information, respect FATIMA's intellectual property, and refrain from unauthorized disclosure or publicity involving FATIMA's name, business, bids, or contracts.

Suppliers are expected to support FATIMA's reporting and investigation arrangements where concerns arise and to establish processes to protect whistleblowers from retaliation. The Supplier Code also addresses environmental responsibility, encouraging suppliers to comply with environmental laws and operate in a manner that supports sustainability and responsible sourcing. FATIMA reserves the right to monitor supplier compliance and take corrective action, including termination of the business relationship, where serious violations occur.

1.3 Speak-Up ("Flag-It / Tell Fatima") Mechanism

FATIMA has established a formal whistleblowing mechanism, referred to as the Flag-It Program / Tell Fatima, to support a culture of openness, accountability, and ethical conduct. The mechanism is available to both internal and external stakeholders and provides a safe and credible means of reporting suspected ethical violations, misconduct, fraud, abuse of power, abuse of position, abusive conduct, or other inappropriate acts or omissions that may place FATIMA or its stakeholders at risk.

The Flag-It mechanism is built around the principles of transparency, anonymity, confidentiality, anti-retaliation, evidence-based reporting, and communication. Stakeholders may choose to disclose their identity or remain anonymous, and FATIMA is committed to protecting the identity of any person raising a concern to the fullest extent possible, subject to legal requirements.

FATIMA maintains zero tolerance for retaliation, victimization, or unfair treatment against anyone who reports a concern in good faith, irrespective of the eventual outcome. Concerns may be raised through multiple channels, including email (tellfatima@fatima-group.com), website, direct approach to Ethics Committee members, and post or courier.

1.4 Investigation Policy

FATIMA has established a structured process to ensure that reported concerns and allegations of unethical behavior are assessed and, where required, investigated through an independent, objective, transparent, and confidential process.

All reported concerns are formally recorded and investigated. Investigations are conducted in a manner that preserves independence, fairness and confidentiality. FATIMA's approach also provides management oversight, preservation of evidence where required, an opportunity for the relevant party to be heard, and recommendation of actions based on facts and evidence.

Where misconduct is substantiated, FATIMA may take proportionate disciplinary or corrective action in line with applicable policies and laws.

1.5 Risk Assessment and Control Activities

A key component of FATIMA's Integrity Risk Management Framework is the assessment and management of integrity-related risks, including fraud risk. The Framework provides for analysis of inherent, residual, and target risks, together with the deployment of control activities to prevent, detect, and mitigate ethical and fraud-related exposures.

The Ethics Committee is responsible for ensuring that integrity and fraud risk assessments are conducted in line with FATIMA's broader internal control and risk assessment frameworks, and that mitigation plans are developed in response to identified risks within the company's risk appetite. This helps ensure that ethical principles are supported by practical controls and that emerging risks are reviewed and addressed on an ongoing basis.

1.6 Monitoring, Reporting, Communication and Training

FATIMA recognizes that the effectiveness of the Integrity Risk Management Framework depends not only on policy design but also on communication, implementation, awareness, and monitoring. The Ethics Committee is therefore responsible for ensuring that the Framework is effectively communicated, periodically reviewed, and monitored through regular reporting and stakeholder engagement. Monitoring includes review of periodic reports, investigation outcomes, residual risks, remedial action plans, and stakeholder feedback.

FATIMA promotes awareness of the Framework through training, onboarding, refresher communication, contract incorporation, website disclosure, and practical guidance for stakeholders. Internal and external stakeholders are provided access to the Framework to promote understanding of FATIMA's ethical expectations. Periodic training and awareness initiatives reinforce the Code of Conduct, the Flag-It Program, and related requirements.