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# Advancing a global compliance culture

## Compliance Model

**In 2023, Saudi Arabia achieved the implementation of the Compliance Model. How did you carry out this process? What were the main challenges you faced?**

Changing behaviours and turning a personal code of ethics into a professional one represents a significant challenge in any organisation. Sometimes companies may initially encounter adverse reactions, but in our case, the support of senior management and the communication of the value of compliance in creating an ethical environment were crucial in the process.

The first action was to communicate the management's decision to implement the Compliance Model, then translate the Code of Ethics into the local language and share it with all staff to raise awareness about the company's mission, vision, and values, as well as the importance of ethics and compliance.

The second step was to provide training on this subject to as many employees as possible at different levels without affecting their daily responsibilities. For this, our online training website allowed them to access various contents (Code of Ethics, anti-corruption, conflict of interest, etc.) at any time.

Another major challenge was ensuring regulatory compliance in a strict environment like Saudi Arabia, with most projects developed with the public sector. In all jurisdictions where we operate, our motto is zero tolerance for non-compliance, whether at the company or employee level.

Regarding internal procedures, we first integrated the policies into the exit process and then deployed them across all departments. Today, we continue to implement the system and establish a compliance culture. This work requires a lot of time and effort, and providing employees with a direct and anonymous communication channel is essential.

## Policy Approval

**How did you approach the approval of policies and procedures considering that operations in this country involve a large number of partners?**

Business partners and shareholders are always open to supporting transparent and ethical practices in the company, although most have their own procedures and policies. To implement a unified system, agreement and communication at the highest level of the companies are necessary. It is also useful to incorporate compliance clauses into contracts or commercial agreements.

After being presented by the Compliance department to the management committee, the Compliance Model was accepted and approved internally. Additionally, the minutes of this meeting were also shared with the management and operations teams of our partners.

**"The support of top management and effective communication have been key factors in the implementation of the Compliance Model"**

## Supplier Approval

**In 2024, you worked on implementing a supplier approval system in terms of compliance. What does this milestone mean for the company in Saudi Arabia?**

To ensure a safe and transparent supply chain, we began the approval process with a selection of the main suppliers by turnover. They had to complete a questionnaire and formally accept our Code of Ethics, values, and ethical policies.

The process continues with the rest of the suppliers—new and existing—and the number of certified companies keeps growing every day. To streamline procedures, we have included the mandatory compliance clause (acceptance of the Code of Ethics and our values) in the purchase order for all suppliers.

Having a supplier approval system enhances our reputation as a company committed to the highest standards of ethics and quality. This not only generates trust but can also help manage supply chain risks. This major milestone of 2024 shows how we align with best practices and international standards, attracting users and customers who prioritise ethical and responsible business relationships.



## Day-to-Day Perspective

**From a more personal and day-to-day perspective, how do you assess the reception of the Compliance Model?**

While all change processes can generate uncertainty initially, doubts disappear when there is effective communication and management support. Following this path, we focused on explaining to the teams how the Compliance Model streamlines processes by providing clear guidelines and facilitates decision-making and relationships with suppliers and business partners.

Employees, for their part, value the training as it helps them manage critical situations in their daily work. For example, the conflict of interest course showed them real cases relevant to their activity, and most highlighted that this training helped them better understand this issue and feel more confident in facing potential ethical dilemmas.

In short, the Compliance Model and training promote an internal culture where employees feel prepared to face these issues. We are convinced that management's involvement and setting an example with their conduct is the quickest way to achieve compliance objectives.