

	<h2 style="margin: 0;">Compliance & Business Ethics</h2> <h3 style="margin: 0;">Policy Statement</h3>		Doc. No:	QM-PO-02
			Issue Date:	06/10/2019
			Rev. Date:	16-04-2025
			Rev No.	06

Basra Multipurpose Terminal (BMT) is committed to conducting all business activities with integrity, transparency, and accountability. BMT upholds the highest ethical standards and comply fully with applicable laws, international regulations, and internal commitments, including our Code of Conduct and Integrated Management System.

To ensure this, BMT:

- Implements continuous training and awareness programs for employees and business partners to embed ethical behavior and legal compliance across all levels;
- Prohibits all forms of bribery, corruption, extortion, and facilitation payments, whether involving public or private entities;
- Enforces a strict zero-tolerance policy on harassment, discrimination, and retaliation in any form;
- Promotes fair treatment, inclusion, and respect for all individuals regardless of race, gender, religion, nationality, disability, age, or personal beliefs;
- Requires employees, officers, contractors, and agents to avoid conflicts of interest and to act with impartiality and transparency;
- Ensures accurate and honest recordkeeping, prohibiting falsification or manipulation of any business records or financial documents;
- Prohibits all forms of forced labor, child labor, modern slavery, and any exploitative or coercive practices;
- Respects the right of workers to associate freely and engage in collective bargaining in accordance with national and international regulations;
- Protects whistleblowers and provides secure, confidential channels for reporting unethical behavior or suspected violations without fear of retaliation;
- Conducts regular internal reviews, audits, and monitoring activities to assess compliance and continuously improve practices;
- Holds all employees and representatives accountable for adhering to this policy, with clear disciplinary procedures for non-compliance.

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In order to achieve these commitments, BMT:

- Provides regular training and awareness programs for all employees and business partners to ensure understanding and implementation of this policy and related procedures;
- Prohibits all forms of bribery and corruption, whether for the benefit of, or received from, any third party—public or private;
- Strictly prohibits facilitation payments made to government officials or any other party;
- Requires agents, representatives, and business partners to fully comply with applicable anti-corruption laws and BMT’s Code of Conduct;
- Ensures employees, officers, and directors avoid any situation that could lead to a conflict of interest or a violation of anti-corruption or business ethics laws;
- Prohibits any employee, directly or indirectly, from promising, authorizing, offering, or paying anything of value to any government official or other party to improperly obtain or retain business, or to secure an unfair advantage;
- Maintains accurate and transparent records, and prohibits false, misleading, incomplete, or artificial entries in any books or documents;
- Prohibits any form of sexual, coercive, threatening, or exploitative behavior, including inappropriate gestures, language, or physical contact;
- Prohibits discrimination of any kind based on color, religion, gender, national origin, age, disability, political beliefs, marital status, sexual orientation, or family responsibilities;
- Prohibits the use of forced labor, slavery, human trafficking, or any form of child labor;
- Respects the right of employees to freely associate and engage in collective bargaining, in line with national and international standards;
- Applies these principles consistently throughout recruitment, business operations, and community engagement activities.

Every individual working with or on behalf of BMT shares the responsibility to uphold these principles. Any suspected violation must be reported to BMT’s Compliance Officer , or the CEO if the Compliance Officer is implicated.

Any breach of this policy may constitute not only a violation of internal rules and the Code of Conduct, but also a breach of applicable laws, and will be subject to appropriate disciplinary or legal action.

Mohammad Damerji

Chief Executive Officer