APP Code of Business Ethics and Conduct
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Who we are

Corporate Profile
Established in 1968, Arab Printing Press (APP) remains located in the heart of the Industrial City – Sid El Bauchrieh – of Beirut and has celebrated in 2018 half a century of experience in the printing industry. The 120 strong team of industry professionals produces a wide variety of books and magazines for clients across the EMEA countries, in addition to vast range of commercial printed items from annual reports to packaging and labels. Put simply, APP is capable of executing almost any printing requirement, and with every process executed in-house, APP continues to deliver excellent product quality in the fastest of turnaround times.

Mission
APP’s mission is to provide clients with the highest quality printing coupled with exceptional services and solutions that not only meet, but exceed client requirements. This drive to ensure optimum client satisfaction is realized by offering the finest end products, customer service excellence, punctual deliveries, and competitive pricing.

Vision
APP’s vision is to continue the growth and success of the last half century while staying at the forefront of innovation, and the continued development of an environmental and socially responsible culture that encourages both employee and customer loyalty.

APP Values
APP cares about the environment and people. This is why APP:

- Adheres to ethical, Health & Safety and environmental practices; fully complies with laws and compliance obligations; and strives to be a leader in reducing negative environmental impact;
- Considers environmental and safety factors and the well-being of the community when making all commercial decisions;
- Commits to: the 10 principles of UN Global Compact and the 17 Sustainable Development Goals; APP climate change strategy; the policy for the association of organizations with FSC; and
- Motivates employees through inclusion, development and training; and recognizes and rewards contribution and achievement.

Additionally, Arab Printing Press is a participant to the United Nations Global Compact initiative and voluntarily complies with and promotes its 10 principles, which are derived from the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption. These Principles are presented in the below figure:
They are as follow:

**Human Rights**

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.

**Labor**

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labor;
5. the effective abolition of child labor; and
6. the elimination of discrimination in respect of employment and occupation.

**Environment**

7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.

**Anti-Corruption**

10: Businesses should work against corruption in all its forms, including extortion and bribery.
HR Core Values

The HR core values are:

- **Promote Honesty, Integrity, and Trust**: We honor our commitments and conduct business in a manner that promotes fairness, respect, honesty, and trust.

- **Celebrate Teamwork**: We encourage the diversity of thoughts, experiences, and backgrounds and celebrate participation and partnership in all of our endeavors.

- **Encourage Communication**: We solicit the input of others and strive for transparency and inclusiveness.

- **Employee Development**: We are committed to maximizing the potential of every individual.

- **Model Leadership**: We lead by example and advocate equitable treatment in our behaviors, policies, and practices.

APP Core Competencies

Core Competencies are the behaviors to be displayed by all APP Employees.

APP’s HR Department practices such as recruiting, hiring, retaining, evaluating... are based on the below core competencies:

<table>
<thead>
<tr>
<th>Competency</th>
<th>Key Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Motivation</td>
<td>• Display energy and enthusiasm in approaching the job.</td>
</tr>
<tr>
<td></td>
<td>• Commit to putting in additional effort.</td>
</tr>
<tr>
<td></td>
<td>• Maintain high level of productivity and self-direction.</td>
</tr>
<tr>
<td>Accountability</td>
<td>• Be present for the entire required shift.</td>
</tr>
<tr>
<td></td>
<td>• Complete any tasks that have been designated to them.</td>
</tr>
<tr>
<td></td>
<td>• Hold responsible for the specific duties that go along with their job.</td>
</tr>
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<td></td>
<td>• Be consistent in doing the right thing in all aspects pertaining to their job.</td>
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<tr>
<td></td>
<td>• Work together towards a common goal for the business.</td>
</tr>
<tr>
<td>Communication</td>
<td>• Express ideas effectively.</td>
</tr>
<tr>
<td></td>
<td>• Organize and deliver information appropriately.</td>
</tr>
<tr>
<td></td>
<td>• Listen actively.</td>
</tr>
<tr>
<td>Integrity</td>
<td>• Share complete and accurate information.</td>
</tr>
<tr>
<td></td>
<td>• Maintain confidentiality and meet own commitments.</td>
</tr>
<tr>
<td></td>
<td>• Adhere to organizational policies and procedures.</td>
</tr>
<tr>
<td>Initiative</td>
<td>• Generate ideas for improvement, take advantage of opportunities, suggest innovations.</td>
</tr>
<tr>
<td></td>
<td>• Do more than required.</td>
</tr>
<tr>
<td>Planning &amp; Organizing</td>
<td>• Plan and organize tasks and work responsibilities to achieve objectives.</td>
</tr>
<tr>
<td></td>
<td>• Set priorities. Schedule activities.</td>
</tr>
<tr>
<td></td>
<td>• Allocate and use resources properly.</td>
</tr>
<tr>
<td>Work Standards</td>
<td>• Set and maintain high performance standards.</td>
</tr>
<tr>
<td></td>
<td>• Pay close attention to detail, accuracy and completeness.</td>
</tr>
<tr>
<td></td>
<td>• Show concern for all aspects of the job and follow up on work outputs.</td>
</tr>
<tr>
<td>Team Work</td>
<td></td>
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<td>-----------</td>
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</tr>
</tbody>
</table>
| • Interact with people effectively. Able and willing to share and receive information.  
• Co-operate within the group and across groups.  
• Support group decisions and put group goals ahead of own goals. |
Using this code

Definition of the Code of Business Ethics and Conduct
The Code of Business Ethics and Conduct applies to all APP employees (Officers and Managers). It is designed to guide the conduct of APP employees, regardless of function or position, on ethical issues that are faced during the normal course of business. It defines the Ethical Principles adopted at APP that shall rule the conduct of its employees, managers, consultants and other stakeholders.

Additional Policies and Standards
Corporate policies and standards provide additional guidance on many of the topics included in this Code. Policies and Standards may be updated periodically and employees are responsible for acting in accordance with any changes.

APP is committed to complying with the laws, and employees are expected to conduct business in a manner that aligns with APP core values.

Violation of the code
A breach of the code can put the company at substantial risk. Every employee is accountable for his or her own behavior. Failure to follow the Code will result in appropriate disciplinary action, up to and including termination of employment or relationship with the Company.

Disciplinary Action
By working for APP, you agree to respect our commitment to ethical conduct. Persons who violate our Code, our internal rules or policies or applicable laws could be endangering the Company and as a result, may be subject to disciplinary measures or penalties. Disciplinary action may also be taken against:

1. Persons who do not take the necessary care or diligence to report a violation;
2. Persons who fail to cooperate with an investigation and specifically those who destroy or try to withhold relevant evidence or information for an investigation or provide false, incomplete or misleading information.
3. Managers or supervisors who attempt to retaliate against someone who has reported, in good faith, a suspected violation or who is cooperating with an investigation in his or her area.

How do you report suspected violations?
All employees are expected to promptly report suspected unethical, illegal or fraudulent activity by anyone working for or on behalf of APP.

Prompt reporting may allow the Company to avoid or mitigate serious harm to the Company or others. Employees may report suspected unethical or fraudulent activity to his/her direct manager or to the Human Resources Department.

All reports are taken seriously and are investigated by the Human Resources Department.

Reported concerns are treated confidentially.

Approval, Enforcement and Amendment
The content of this Code has been prepared by the Human Resources Department and approved by the Chairman and General Manager, Mr. Elie Raphael, and shall become effective as of the date of its approval.

It shall be revised from time to time and amended and updated accordingly, following the same procedures used for its preparation, to reflect the inevitable process of change in society in general and in APP in particular.
Responsibilities of our Employees

Your responsibilities as an APP employee with regard to our Code are to:

- Read, familiarize yourself with and understand the Code. If you are unsure or have questions, seek advice from your direct manager and/or the Human Resources Department.
- Complete the ethics training provided by the Company and make sure you adhere to the Code.
- Demonstrate, through your words and actions, your commitment to integrity, ethics, compliance, transparency, honesty, respect and care for the environment, always acting in a safe, ethical, professional and responsible manner. Let your actions speak for you.
- Be a spokesperson for our Code, encouraging both employees and other parties to abide by it.
- Be aware of and follow Company rules and policies and any laws and regulations that apply to your professional activities.
- Always avoid any type of activity that could be unethical, illegal or damaging to the Company’s reputation.
- Identify and properly manage the risks related to your responsibilities.
- Ask for advice whenever you are in doubt or faced with an ethical dilemma.
- Provide your fullest cooperation with investigations and audits by volunteering any truthful information you may have.
- Report any actual or suspected violation of the Code.

In the Workplace

Performance Quality

a. Compliance with Laws: Employees shall comply with applicable laws in the performance of their duties.

b. Compliance to Quality Management System: Employees shall perform their duties in full compliance with Quality Management Systems. This covers compliance to policies, procedures and processes on the execution of operations efficiently.

c. Compliance with the Environmental & Safety Policies: Employees must comply with applicable environmental and safety rules, procedures and requirements and should contribute to the applicable objectives and should report about the hazards that will have an impact on the environment and health.

Professional Behavior

It is important to behave responsibly when representing APP or attending Company events. You must represent the Company in a positive manner when dealing with clients and potential clients, and in all business activities.

APP's Reputation

All individuals to whom this Code applies must conduct their business activities in a manner that protects and enhances the Company’s reputation. The risk of damage to our reputation must be a key consideration in assessing and engaging in any business relationship, transaction or activity. Any incident with the potential to harm our reputation is of high priority and senior management is to be alerted.
Discrimination and Harassment

APP is committed to providing every employee a safe work environment that is free of discrimination, harassment and violence and that is conducive to professional growth and the enhancement of dignity and self-esteem.

We believe in treating each other with respect and dignity, and in fostering an atmosphere of open communication, trust and mutual respect.

Managers at APP are responsible for creating and maintaining a workplace that is free of discrimination, harassment and violence, and for promoting a positive work environment by dealing with any case of discrimination, harassment or violence that comes to their attention, treating any such case as a serious matter and responding to it promptly.

As an APP employee,
- Treat others the way you would like to be treated, with respect, courtesy, fairness and sensitivity;
- Don’t initiate or participate in discrimination, violence or harassment;
- Exercise authority with care and in a respectful manner; and
- Don’t be afraid to speak up and be assertive if you feel that you or others are being harassed, discriminated against or have experienced workplace violence.

What is considered harassment?
Harassment can include verbal, written or physical conduct or other action that is degrading, or shows hostility or aversion towards an individual. A few examples of harassment include:
- Insulting or degrading jokes, remarks or conduct
- Disparaging or abusive comments
- Threats or intimidation
- Negative stereotyping
- Offensive objects or pictures circulated in the workplace
- Sexual/Gender harassment (verbal or physical behavior based on a person’s gender; it can include unwanted touching; offensive and suggestive gestures or comments).

What is considered discrimination?
Discrimination is prejudicial treatment in the workplace, which may affect hiring, firing, promotions, salary, job assignments, training, benefits and/or layoffs, based on a person’s age, gender, sexual orientation, race, religion, national origins or disabilities. A few examples of discrimination include:
- when an employee or job applicant is treated unfavorably because of his or her race, skin color, national origin, gender, disability, religion, or age.

Child and Forced Labor

APP is committed to comply with and respect individuals’ right under Forced Labor and Child Labor laws.

APP and its employees will not tolerate, engage in or support any form of Child and Forced Labor through APP’s activity and it has the responsibility to engage in employment practices that meet the highest legal and ethical standards.

What is Child Labor?
Child Labor means labor that deprives children of their childhood, their potential and their dignity, and that is harmful to physical or mental development. It includes work that is mentally, physically, socially and morally dangerous and harmful to children, and interferes with their schooling.

What is Forced Labor?
Forced Labor means all work or service exacted from a person under threat or penalty (including slavery, servitude and forced recruitment), which includes penal sanctions and the loss of rights and privileges where the person has not offered himself or herself voluntarily.
Equal Employment Opportunity

APP is an equal opportunity employer and will provide equality in employment for all people employed or seeking employment. At APP, we recruit, promote, train, develop and pay in a way that is fair and based solely on objectives factors, including merit, qualifications, performance and business considerations.

Consistent with this, APP does not condone any form of unlawful discrimination or vilification, including that which relates to:

- gender;
- nationality;
- pregnancy;
- potential pregnancy;
- marital status;
- family status;
- disability;
- race, color, social origin;
- age;
- sexuality;
- religious belief or activity;
- political belief or activity;
- union membership; and
- physical features.

In all cases no factors other than performance and competence are to be used as the basis for performance assessment, training and development opportunities and promotions.

Diversity and Inclusion

We are committed to fostering, cultivating and preserving a culture of diversity and inclusion.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company’s achievement as well.

We embrace and encourage our employees’ differences in age, color, disability, background, family or marital status, gender identity or expression, language, national origin, physical and mental ability, race, religion, socio-economic status, and other characteristics that make our employees unique.

APP diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations.

All APP employees have a responsibility to treat others with dignity, respect, courtesy and in a fair and equitable manner at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site.

Human Trafficking and Slavery

APP is committed to doing its part to help eliminate and fight against slavery and human trafficking and strictly prohibits all employees from engaging in slavery and human trafficking-related activities. Slavery activities can occur in various forms including slavery, servitude, forced and compulsory labor and human trafficking. Human Trafficking activities include, among others, engaging in sex trafficking, procuring commercial sex acts, using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person.

Employee Privacy

APP is committed to maintaining the accuracy, confidentiality and security of our employees’ personal information and records. We will not compromise an employee’s trust by disclosing confidential information to anyone without a business need for the information.
Health and Safety
We are committed to providing a safe, secure and healthy workplace for all our Employees.
We do not tolerate, in any manner, any threats, acts or intent to commit a violent act that jeopardize, or appears to jeopardize, the safety of employees.

In parallel, and because it is a shared responsibility, employees are responsible:
- for following all safety laws and procedures;
- for taking all reasonable and necessary precautions to ensure their own health and safety and that of anyone else who may be affected by their work or activities;
- and for reporting any hazardous or unsafe conditions or practices, such as improper use of safety equipment, risks of exposure to electrical or chemical substances or blocked emergency exits in a timely manner.

Confidentiality
At APP, employees have certain obligations under the law to keep the company’s information and third-party information confidential. These confidentiality obligations apply in all circumstances relating to employment with APP.
All APP members must not communicate information relating to the business and affairs of APP (or of any third party) that they learn in the course of their work with APP to any person not entitled to the information. Employees must not use the information obtained during their course of work at APP for purposes of personal gain for themselves, their families or others connected to them. They should never disclose confidential information to anyone, other than what is required of them in connection with their duties at APP.

As an APP employee:
- Keep electronic and paper documents and files containing confidential information in a safe place;
- Do not discuss confidential matters where they could be overheard, for example, in public places such as elevators, hallways, airplanes and restaurants;
- Exercise caution when discussing confidential matters on wireless telephones or other wireless devices;
- Transmit confidential documents electronically, such as by fax, text or email, only when it is reasonable to believe this can be done under secure conditions; and
- Avoid unnecessary copying of confidential documents.

Conflict of Interest
A conflict of interest occurs when your private interest interferes in any way with the interests of the Company, its clients or its customers.
A conflict situation can arise when you take actions, have interests or are involved in outside activities that make it difficult to perform Company work objectively and effectively, or affect your judgment to act in the best interest of customers, investors and other stakeholders.

Employees must never use or attempt to use their position at APP to obtain any improper benefit for themselves, their families or others connected to them, and they must always seek to avoid not only real, but also potential and perceived, conflicts.

As an APP employee:
- Always obey to the law and honor your professional commitments and obligations to APP;
- Do not solicit gifts or benefits for yourself, which might, in any way, compromise or influence you in carrying out your duties;
- Don’t take part in activities or businesses outside of work that may compete with APP or that may damage APP’s reputation; and
• Don’t use your position at APP to advance your interests or those of your family or others connected to you;
• Be alert to any actual or potential conflict of interest and seek guidance from the Human Resources Department.

What are some examples of conflicts of interest?
It is impossible to anticipate all of the circumstances and conditions that might involve a conflict of interest. However, following are some activities that are not allowable or require careful consideration.

• Allow decisions to be influenced, or appear to be influenced, by personal or family interests or friendships
• Have a financial interest in, or perform work for, another entity that is a customer, supplier or competitor of Principal.
• Benefit personally from opportunities or resources that are presented to you as a result of your work at Principal.
• Use Company property, information or resources for personal use or outside activities.
• Have an outside job that interferes with your ability to do your job.

Bribery and Corruption
It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings in Lebanon and abroad.

Employees are not prohibited to giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with APP’s ethical policy in respect of gifts and hospitality. We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a person in the performance of his duties.

What is BRIBERY and CORRUPTION?
A bribe is any financial or other advantage which is offered, promised or given by one person to another, where the intention is to induce or reward improper performance of a public function or business activity, or is done in the knowledge or belief that acceptance of the advantage itself constitutes the improper performance of a public function or business activity.
A bribe does not need to be a monetary sum. A bribe can be any type of gift, Cash, cash equivalents (such as gift certificates/cards), stock, personal property and assumption or forgiveness of a debt; Gifts, meals, entertainment and travel; Job offers or internship awards consideration or advantage offered or requested, for example, a discount in a commercial transaction or an offer of employment.
Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery.

Use of Resources
APP’s assets include physical assets, such as computer, mobile devices, information technology hardware, facilities, vans, machinery, raw materials and supplies, as well as intangibles, such as our brand and reputation.

APP undertakes to provide its employees with all the necessary and appropriate equipment and resources to conduct their professional duties and responsibilities.

As an APP employee:
• Ensure that APP’s assets are used responsibly, efficiently and for business purposes.
• Avoid using APP’s assets for personal purposes unless such a use is approved by top management and is in accordance with the company’s policies.
• Keep APP assets in good condition, observe proper maintenance practices and apply workplace risk prevention measures with a view to preventing accidents and extending the useful life if such asset.
Environmental Stewardship
APP places the highest priority on protecting the environment and minimizing the impacts of our operations while supporting policies intended to combat the climate change.
We are committed to being an environmentally responsible corporation, stringently complying with all applicable environmental laws and company regulations, policies and procedures.

As an APP employee:
- Carefully analyze and monitor the level of environmental risks and impacts from our operations;
- Adhere to all policies and procedures undertaken by APP with regard to the environmental aspects of our products, services and activities;
- Follow and complete all training sessions, understand all environmental issues that impact your job and stay abreast of any changes resulting from the company’s policy to ensure continuous improvement in our processes;
- And immediately report any environmental issue or non-compliance to Quality Department;

With Customers

Customer Complaints
Ensuring that customers are treated fairly is the heart of our business. Customer complaints give us valuable information to help improve customer service by alerting us to problems that need attention. Done correctly, complaint handling provides us with an opportunity to rebuild relationships with our customers when something has gone wrong. We must each take steps to help resolve complaints promptly and appropriately. We must do so in accordance with the complaint procedure to ensure complaints are recorded, resolved and reported in a compliant manner.

Fair Dealing with Customers
We are proud of our reputation of integrity in the marketplace. We offer our products and services based on accurate and truthful representations. Each of us must deal fairly with customers, suppliers and competitors. We do not misstate facts, provide misleading impressions or make false claims about our capabilities or our competitors to gain an advantage. We do not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation or any other unfair dealing practice.

Privacy and Information Protection
We are committed to protecting the privacy and confidentiality of all sensitive information about our customers, our associates and our Company. It is essential that others know that information entrusted to us is handled with integrity and discretion. We collect only information needed or appropriate for business purposes, and do so only by lawful and fair means. In accordance with the privacy laws applicable, we appropriately safeguard the security and confidentiality of Company records containing personally identifiable information. We must each access and/or use customer information for appropriate business purposes only.
Quick Ethics Check

While a code of conduct can provide principles of behavior and some general rules, it cannot cover every situation. Ethics sometimes come down to a personal decision. To help you make the right choice, ask yourself the following questions:

✓ Is this legal?
✓ Is it fair?
✓ Would I want other people to know I did it?
✓ How would I feel if I read about it in the newspaper?
✓ How will I feel about myself if I do it?
✓ What would I tell my child or a close friend to do in a similar situation?

A Final Word

APP’s reputation is the result of more than 50 years of dedication, quality service and ethical dealings. Keeping our good reputation depends directly on the decisions you make every day.

This Code of Business Ethics and Conduct provides standards and sets high expectations for all APP employees to the Company. However, your own good judgment is most important in ensuring that APP remains an ethical company.

If you have a question or concern you may contact the Human Resources Department.