



NEOM

NEOM
OUR CODE OF CONDUCT
Change starts here

CONTENTS

INTRODUCTION 3

- A CEO foreword 4
- B Scope of our Code 5
- C How to use our Code 6
- D The role of managers 7
- E Speaking up 10

1. OUR VALUES 12

2. OUR PEOPLE 14

- A Diversity, equality, and inclusion 15
- B Bullying, harassment, and sexual harassment 17
- C Promoting safety 19
- D Health and well-being 21

3. OUR WORLD 23

- A Human rights 24
- B Environment 27
- C Local communities 29
- D Communicating with the media and use of social media 31

4. OUR TECHNOLOGY 33

- A Responsible innovation and use of technology 34
- B Cybersecurity 36
- C Data privacy 39

5. OUR RESPONSIBLE BUSINESS PRACTICES 41

- A Anti-bribery and anti-corruption 42
- B Conflicts of interest 45
- C Gifts and hospitality 47
- D Countering fraud 50
- E Fair competition 52
- F Accurate books and records 54
- G Shareholder reporting 56
- H Confidential information 58
- I Money laundering, terrorist financing, and sanctions 60

FURTHER INFORMATION AND RESOURCES 62



NEOM

NEOM: Our Code of Conduct

INTRODUCTION



INTRODUCTION

A CEO foreword

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources



Dear Colleagues,
At NEOM, we are 'dreamers and doers.' Making our dream a reality isn't just about doing what is impossible, it's also about doing what is right.

While we seek to establish a turning point in our relationship with technology and the world around us, we need to remember that future generations will measure our success not only by what we achieve, but also by how we achieve it. As NEOM grows, and the number of those sharing in our dream increases, this way of working needs to be defined and set out clearly, so that it can be understood by everyone.

Our Code of Conduct, which you are about to read, was created with exactly this aim in mind.

Our Code of Conduct sets out what we expect of those who work for and represent NEOM, including its subsidiaries and people. At its core, our Code speaks to the responsibilities everyone at NEOM has to act with honesty and integrity.

Our Code of Conduct was built to reflect our vision of NEOM and represent our exceptional standards and values. I am grateful to all who participated and were involved in the conception,

development, and refinement of this important document.

Our Code offers us solid foundations from which we must build. Demonstrating our high standards of ethical conduct and integrity set out in our Code will empower you with confidence and inspire those you work with to do the same. As our bold vision becomes a reality, we must make the principles of our Code, together with our Values, a part of our daily working lives. This means making use of the range of further information, resources, and points of contact to which our Code of Conduct guides us. Importantly, it also means speaking up when we encounter behaviors or business decisions that do not align with the Code.

By modeling our ways of working on the NEOM Code of Conduct, we can ensure that our dreams are not only achieved but also achieved in the right way.

Nadhmi Al-Nasr
CEO, NEOM

INTRODUCTION

B Scope of our Code

At NEOM, we are creating a new vision of what the future could be.

This new future will depend on various factors coming together to make it a reality:



Our Values
The basic principles, beliefs, and priorities that underpin our decision-making



Our people
The colleagues and teams working every day to bring our ambitions to life



Our world
The communities, societies, and natural environments that need our protection and care



Our technology
The driving force enabling us to achieve our goals in new, creative, and sustainable ways



Our responsible business practices
The areas of good judgment and integrity required to ensure that we not only succeed in what we deliver, but also that our success is measured by the fact it is achieved in the right way

The following Code of Conduct ('the Code') will set out NEOM's commitments in each of these areas, and the behaviors we expect from each of you to help us uphold them.

The Code applies to all NEOM board members, committee members, executive management, employees, subsidiaries, whether directly or indirectly owned, subsidiary employees, independent contractors, suppliers, and anyone who does business with NEOM (we'll just use 'NEOM representatives' from now on).

Throughout this Code, we will use words like 'we,' 'us' and 'our' to refer to NEOM as a company. When you see words like 'you' and 'your,' we are addressing you as NEOM representatives directly.

We will use question and answer (Q&A) boxes, throughout the document, as a way of showing you some of the real-life scenarios in which our Code of Conduct should be applied.

All NEOM representatives are required to understand our commitments and follow our expectations as set out in this Code.

We also have additional documents in place for specific NEOM representatives. Additional expectations for board members are set out in our [Governance Manual](#); and additional expectations for suppliers, as well as anyone doing business with NEOM, are set out in our [Supplier Code of Conduct](#). Our subsidiaries, whether directly or indirectly owned, are also bound by the [Subsidiary Governance Policy](#), which places additional responsibilities on our subsidiaries to enable the whole group to meet our conduct standards.

Failing to meet these expectations could result in investigation and disciplinary measures in line with our associated procedures. Any exception to the standards and expectations set out in this Code must be presented to the Compliance Department and approved by the Board.

INTRODUCTION

C How to use our Code

We recognize that our Code won't provide you with the answer to every question.

However, it will provide you with a summary of our commitments and expectations, as well as a 'map and compass' to help guide you toward more information and points of contact where necessary.

We want to empower you to confidently make the best decisions as quickly as possible. So we want to make this Code easy to approach and use. Look out for the 'Further information' headings within the document, which point out the additional documents and contacts you might find useful. These resources are then listed fully in the 'Further Information and Resources' section at the back.

If the answer to all these questions is 'Yes' – then, go for it! However, if the answer to any of these questions is 'No,' you should avoid that course of action, or talk to our Compliance Department. You should also speak to the Compliance Department if your answer is "I'm not sure" or if any part of this Code is unclear to you.

As well as the Compliance Department, you can also speak to your line manager, your People Business Partner, or an appropriate senior colleague from another department. This Code will help guide you to the best point of contact for your query.



Using this information, you can ask yourself the following questions, when deciding whether or not to take a certain course of action in your working life:

- Is it legal?
- Does it align with our Code and our Values?
- Does it align with our policies?
- Would it reflect positively on NEOM if it came out in the media?



If you have a more serious concern, or would like to speak to someone anonymously, our '[Speaking up](#)' section will show you how you can do this as well.

INTRODUCTION

D The role of managers



Why it matters

We all have a responsibility to follow the principles set out in this Code of Conduct – but if you’re a manager at NEOM,* you also have some additional responsibilities.

As managers, it’s part of your role to serve as an example, and a source of guidance, to your team members on the day-to-day issues that our Code of Conduct covers. In this section, we’ll set out what we mean by this, and how NEOM commits to support you in this role.

*By ‘manager’ we mean anyone to whom individuals or teams report as part of their work. This could include line managers, team leaders or supervisors, as well as more senior staff members.

Our commitments

- We will stand by our managers in any decision they make that is in line with our Code of Conduct – we understand that the right decision isn’t always the easiest one
- We will also listen to the concerns of our managers regarding any behavior, by their team members or fellow managers, that goes against this Code of Conduct
- Finally, we commit to empower our managers with any support they need to fulfil their additional responsibilities in relation to our Code of Conduct set out in the following pages

INTRODUCTION

D The role of managers

Our expectations

As managers at NEOM, we expect you to:



Set a clear example, by upholding our Code of Conduct's principles in your daily working life



Act as an ambassador for our Values, making sure you embody them in your leadership behaviors and can provide others with guidance on how to be a role model to do the same



Be familiar with our Code of Conduct, so that you can act as a point of contact for any related questions from your team members or fellow managers

Talk about our Code of Conduct with your team members, to ensure they understand its expectations

Challenge any behavior you see which goes against our Code of Conduct – not only among your team members but also among your fellow managers too



Be accessible and listen to any team members with concerns about the conduct of their colleagues or other managers



Respond as soon as possible to any concern raised (and don't forget to thank the person who raised it – the decision to speak to you may not have been an easy one)

And finally, just ask! We don't expect our managers to have the answer to every question. So, it's important that you seek advice from senior colleagues or escalate concerns when the best course of action isn't clear to you. Your management colleagues in the Legal, People and Compliance departments, for example, are on hand to act as a point of contact for any relevant questions or concerns

INTRODUCTION

D The role of managers

Q

I work as a manager in our Procurement Department. Recently, one of my team members sent me an email. She said she was concerned that one of her colleagues had a personal interest in a potential supplier and that this might be affecting his decisions at work. I'm pretty sure that 'conflicts of interest' is a Compliance Department issue, and I wouldn't know how to answer this concern properly. So, I think I'd better just thank her for the email and get back to work. Can't do any better than that, right?

A

Wrong. At NEOM, we don't expect our managers to know the answer to every question. But we do expect managers to ask an appropriate senior colleague if they are unsure how to respond to queries from their team – especially if these queries relate to our Code of Conduct. If you're unsure of how to reply to your team member regarding any potential conflict of interest, you should thank them for raising the concern, then ask a colleague in our Compliance Department for advice before responding.



Further information

More information is available in our:

PEOPLE POLICIES

However, you can also contact your People Business Partner or another member of the People Department if you have any questions or queries on the role of managers.

INTRODUCTION

E Speaking up

CONTENTS

Introduction

1. Our Values

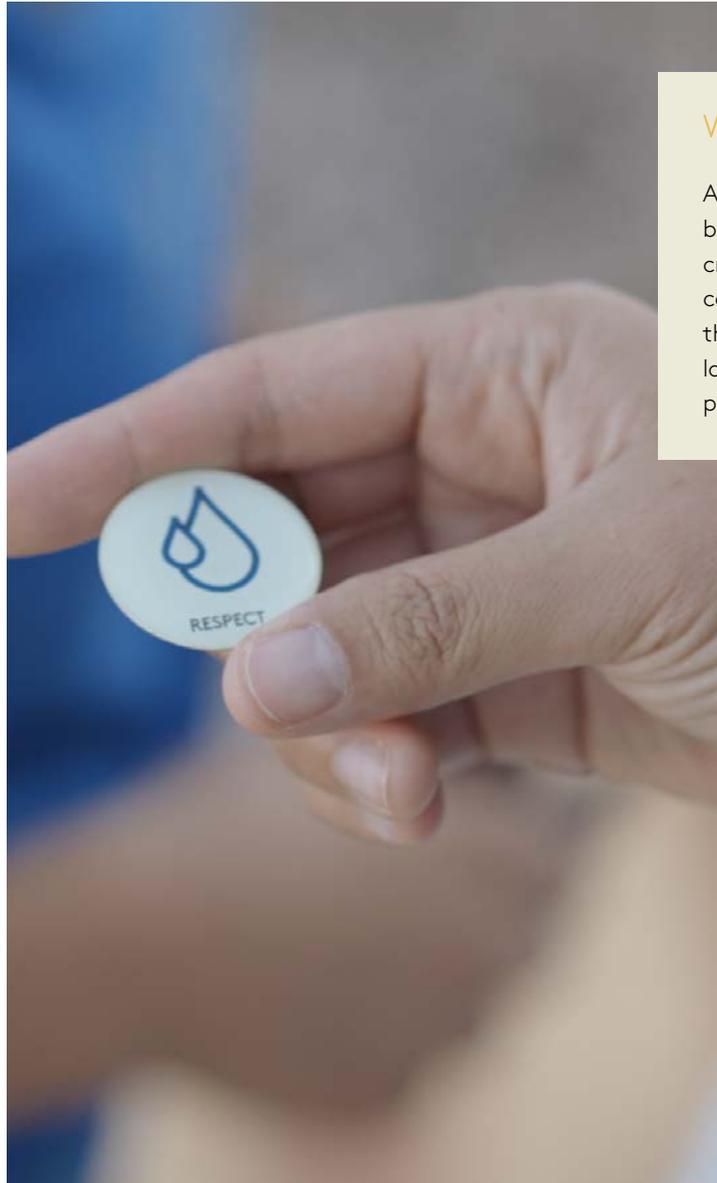
2. Our People

3. Our World

4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources



Why it matters

At NEOM, we want to create a place that is exceptional. In order to achieve this bold vision, we also need to create a great place to work. We need your support to create a culture of integrity, where anyone at NEOM feels confident in raising any concern if they feel something isn't right. If you know of, or suspect, any behavior that goes against this Code of Conduct, our Values, our policies, or applicable laws and regulations, we need you to 'Speak up.' Working together, we can build a place that everyone is proud to be a part of.

Our commitments

As a company, we are committed to:



Creating an open culture where all employees feel comfortable reporting unacceptable behaviors



Not tolerating retaliation against anyone who reports a concern in good faith (if a report is made in good faith, it means the report is sincere and made in the best interests of NEOM, rather than for personal gain)



Raising awareness of the various ways NEOM representatives can report a concern

INTRODUCTION

E Speaking up

Our expectations



As NEOM representatives, we expect you to:



Speak up! And tell us as soon as possible if you have any concerns about potential breaches of applicable laws and regulations, this Code of Conduct, our policies, or NEOM's Values



Report any retaliation against anyone who raises a concern using our Speak Up channel



As an organization, we are committed to transparency. If you raise a concern as part of the Speak Up process, you will receive a guidance note setting out what to expect during and following any investigation resulting from having raised your concern. For reference, this guidance, known as '[What to Expect During a Speak Up Matter](#)', can be found on the Speak Up channel.

In most circumstances, the right thing to do is to talk to your manager. However, if you don't feel able to do this, you can also contact the Compliance, Legal or People departments.

We are committed, as part of our Speak Up program, to protect the confidentiality of anyone raising a concern. Our Speak Up channel will offer you the option to make a report anonymously. However, it's important to remember that anonymous reporting is only an option. If you feel comfortable providing your name, we can take action faster and more effectively.



If none of these options are appropriate, you can also use our Speak Up channel: <https://SpeakUp.NEOM.com>

As long as your report is made in good faith, we will protect you from any form of retaliation – even if your concern turns out to be unfounded.



NEOM

NEOM: Our Code of Conduct

1. OUR VALUES

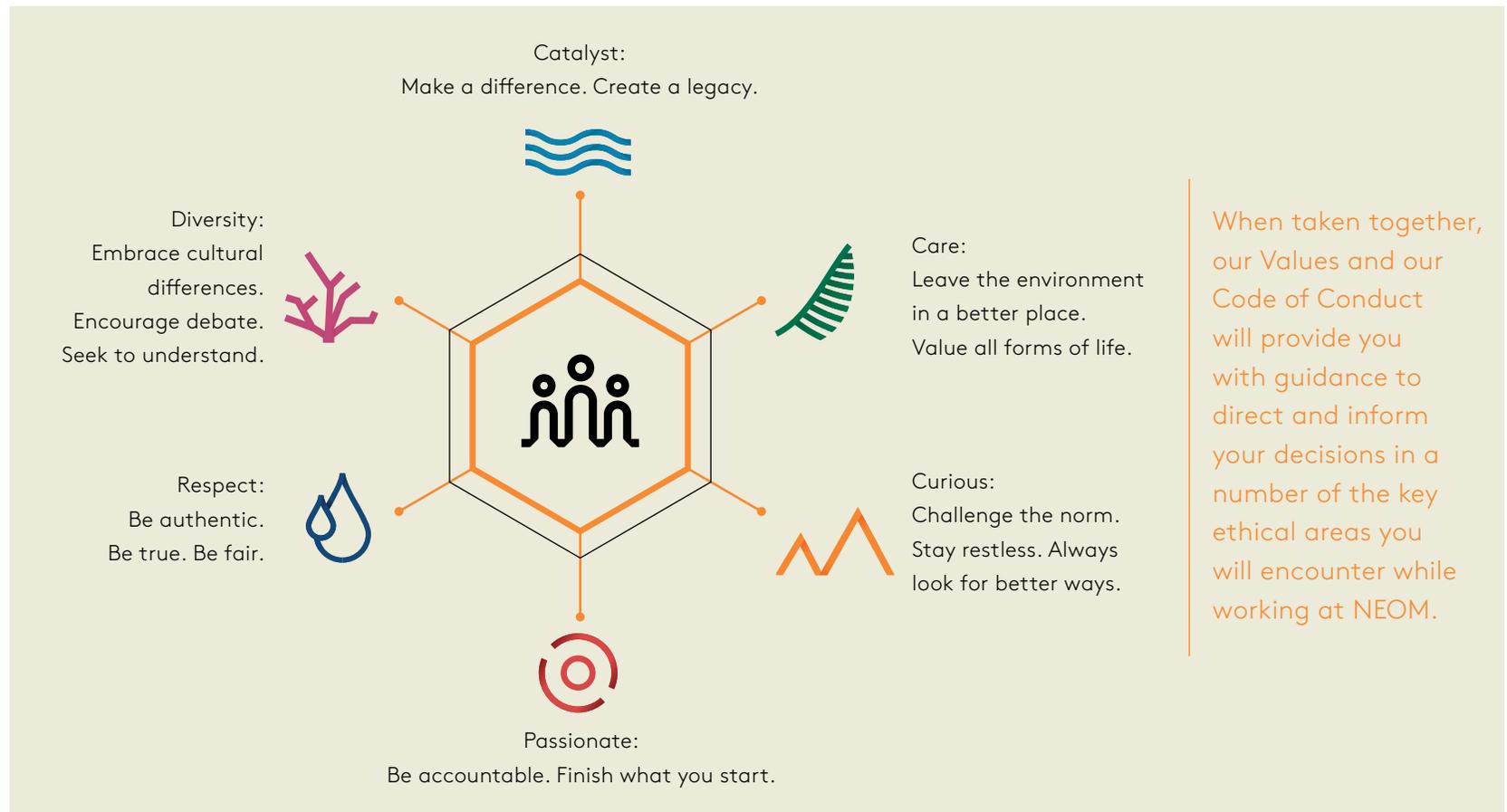


1. OUR VALUES

Our Code of Conduct doesn't exist in isolation. It is underpinned by applicable laws and regulations and our supporting policies, all of which provide you with additional and essential guidance.

We are proud of our NEOM Values and how they inform the expected behaviors we ask everyone at NEOM to uphold. Our Values support the standards set out in this Code and should help provide you with guidance about how you should act and behave.

Your actions should always support the following NEOM Values:



When taken together, our Values and our Code of Conduct will provide you with guidance to direct and inform your decisions in a number of the key ethical areas you will encounter while working at NEOM.



NEOM

NEOM: Our Code of Conduct

2. OUR PEOPLE



2. OUR PEOPLE

A Diversity, equality, and inclusion



Why it matters

For NEOM to become an 'accelerator of human progress,' we need to incorporate and celebrate all that humanity has to offer. This means embracing inclusivity and equality of opportunity, and ensuring that our teams are as diverse as the world in which we live.

Our commitments

As a company, we are committed to:



Creating a working environment and culture that supports, develops, and promotes equality and diversity



Upholding a zero tolerance approach to discrimination based on protected characteristics, such as race, color, religion, gender, or political beliefs



Ensuring all recruitment, training, and promotion opportunities are based solely on merit, talent, and suitability



Listening to all cases of discrimination that are reported to us, and responding to proven cases with disciplinary action

2. OUR PEOPLE

A Diversity, equality, and inclusion

Our expectations

As NEOM representatives, we expect you to:



Treat everyone fairly and never discriminate against others based on protected characteristics, such as race, color, religion, gender or political beliefs



Celebrate NEOM's diversity and help us to create a working environment where everyone is free to be themselves, by valuing different perspectives, identities, and opinions, and encouraging a free and open exchange of ideas (remember that 'Diversity' is one of our Values)



Help us identify behaviors or decisions that go against our commitments to a diverse and inclusive workplace by reporting these to your manager, an appropriate senior colleague, or our Speak Up channel



Talk to us. If you have any questions or are just unsure what might constitute discrimination, you can always speak to your line manager or an appropriate senior colleague.



Further information

More information is available in our:

PEOPLE POLICIES

However, you can also visit our NEOM People Hub or contact the People Department if you have any questions or queries about our approach to diversity and inclusion, or what might constitute discrimination.

2. OUR PEOPLE

B Bullying, harassment, and sexual harassment

Why it matters

At NEOM, we're not only building the city of the future; we're also building a great place to work.

Behaviors like bullying, harassment, and sexual harassment are not aligned to NEOM's Values and violate applicable laws, regulations and NEOM policy. These behaviors damage our culture, undermine our positive working environment, and prevent all of us from achieving our potential.

Bullying, harassment, and sexual harassment can be subtle, obvious, deliberate, or unintended. At NEOM, what we care about is the impact of this behavior – not just the intent.



Bullying and harassment come in many forms, but all have the potential to cause offense or humiliation to another person. Some examples could include:

- Shouting or being aggressive toward someone
- Consistently putting someone down in meetings
- Misusing power or authority to deliberately exclude or humiliate others

Sexual harassment is any unwelcome behavior that is sexual in nature. Like bullying and harassment, it could be directed not only toward employees but also contractors, suppliers, partners, or even those applying to work with us. Sexual harassment can affect anyone and is not gender specific. Some examples could include:

- Repeated requests for romantic dates when the other person has refused
- Unwanted or inappropriate touching, gestures, or staring
- Making sexualized remarks openly about another person's body, clothing, or appearance

Our commitments

As a company, we are committed to:



Providing a safe working environment, designed to foster your well-being, free from bullying, harassment, or sexual harassment



Listening, reviewing, and responding to all reports of alleged bullying, harassment, or sexual harassment, including taking disciplinary action where appropriate

2. OUR PEOPLE

B Bullying, harassment, and sexual harassment

Our expectations

As NEOM representatives, we expect you to:



Understand our position on bullying, harassment, and sexual harassment, and treat everyone working for, or on behalf of NEOM, with dignity, respect, and fairness



Never engage directly or indirectly in any form of bullying, harassment, or sexual harassment (it does not matter whether the behavior is in public or private - NEOM has adopted a zero-tolerance standard)



Help us uphold our commitment to a safe and respectful working environment, by speaking up if you know or suspect that any bullying, harassment, or sexual harassment is taking place (see '[Speaking up](#)' section)



Talk to us. Speak to your line manager, your People Business Partner, or a member of the Compliance Department if you're unsure what behaviors might constitute bullying, harassment, or sexual harassment.

Q

My work takes me to some of our construction sites. Yesterday, I visited one of our sites to drop off an urgent piece of work which my colleague had been requesting. When I dropped it off, my colleague made a joke about my work taking so long to complete and needing extra effort to make it acceptable. This is not the first time he has done this. It's starting to make me feel uncomfortable, but I'm not sure what to do. I don't want to cause any trouble, but value my reputation for doing great work. I think I won't say anything and hope he stops.

A

Wrong. Such conduct might very well amount to bullying and harassment. NEOM takes a zero tolerance approach to bullying and harassment of any kind. Even if you think your colleague is only joking, what's important is how this behavior makes you feel. At NEOM, what we care about is the impact of behavior like this - not just the intent. If you feel subjected to such behavior, you should notify your manager, another senior colleague, or our Speak Up channel as soon as possible. As long as your report is made in good faith, we will protect you from any form of retaliation.

Further information

More information is available in our:

PEOPLE POLICIES

2. OUR PEOPLE

C Promoting safety



Why it matters

At NEOM, we are building a place and creating an environment where humanity can thrive. At a minimum, therefore, we want to preserve the safety of every human being who chooses to live or work with us. We recognize that ours is an industry with big ambitions and significant time pressures to achieve them. However, we also aim to ensure that all of our ambitions are achieved in the safest possible way.

Our commitments

As a company, we are committed to:

- Adhering, at a minimum, to all health and safety laws, standards, and regulations that apply to us and go beyond the basic requirements by using world-class technologies to maintain a safe environment
- Working to reduce any risks of injury or ill health resulting from our activities through the effective implementation of our occupational health and safety management system
- Fostering a culture of openness and transparency, in which those who live and work with us feel able to report health and safety issues or concerns immediately, without fear of blame or retaliation
- Making safety part of our DNA, by ensuring that it is a priority, not just for our dedicated safety teams, but for all of the business functions contributing to our goals
- Providing safety training, utilizing virtual reality, augmented reality, and simulator methods where possible, to ensure all those living and working at NEOM are equipped to uphold our safety standards
- Actively consulting with relevant stakeholders, such as workers and contractors, to understand their safety concerns and engage them in our safety programs
- Providing access to a Worker Help Line and the EnableOn mobile application for the reporting of hazards, risks, concerns (or just any other ideas about how we can improve our safety standards further)
- Measuring our safety performance continuously, so that we can be sure we are always improving
- Making safety part of the entire life cycle of our assets including the development, procurement, operation and maintenance, rehabilitation, and decommissioning phases
- Staying prepared (by continuously improving our emergency response plans)
- Responding appropriately to all accidents, near-misses, and unsafe working conditions, by investigating them thoroughly and putting in place action plans to prevent them from happening again

2. OUR PEOPLE

C Promoting safety

Our expectations

As NEOM representatives, we expect you to:



Help us to uphold a safe working environment by making sure you understand and follow our safety commitments, policies, and procedures



Work safely and in a way that does not put yourselves or your co-workers at risk, for example by properly using all necessary personal protective equipment and devices



Help us to foster a culture of accident prevention within your team, by encouraging open reporting of all accidents, near-misses, and unsafe conditions – as well as recognizing positive safety practices among your colleagues, especially if you are in a leadership position



Report any safety risks, accidents, or questions as soon as possible to your designated Safety Officer, your supervisor, the Worker Help Line or the EnableOn mobile application



Further information

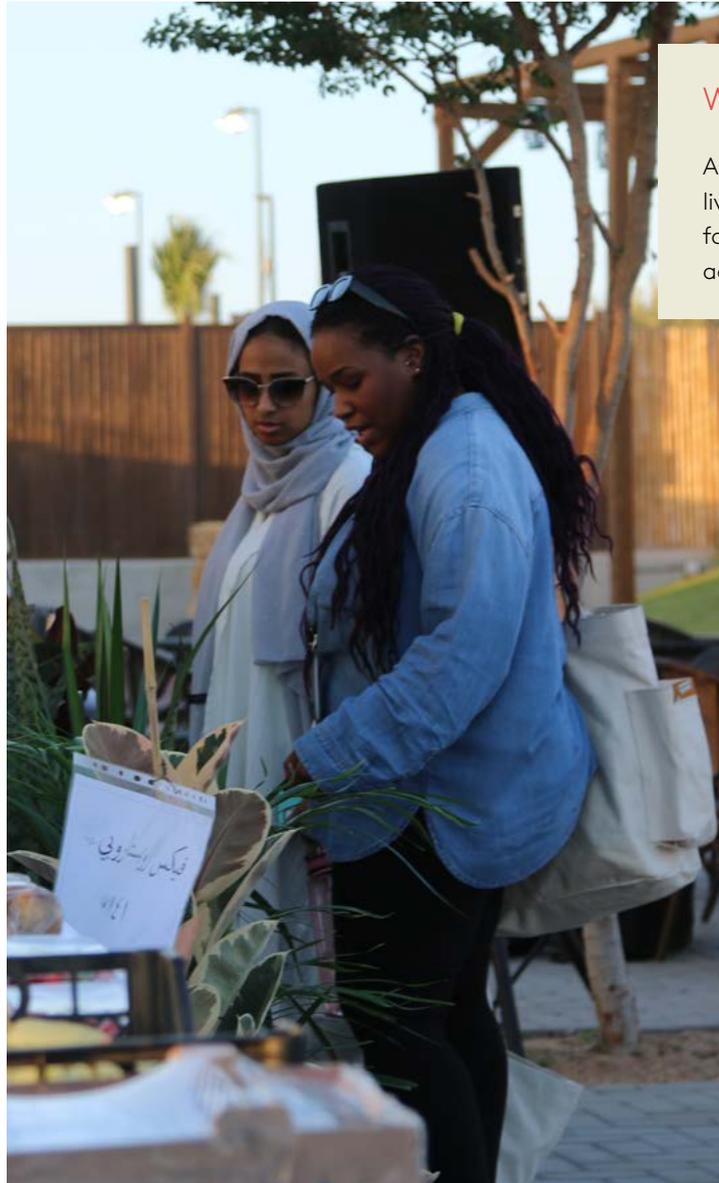
More information is available in our:

[SAFETY POLICY AND EXECUTIVE SAFETY COMMITTEE CHARTER](#)

However, you can also contact NEOM Safety if you want to raise a concern or report anything.

2. OUR PEOPLE

D Health and well-being



Why it matters

As the first human habitat conceptualized, designed, and planned to nurture healthy living, NEOM is 'healthy by design.' For us to live up to this bold design, it's important for us to keep our commitment to a healthier future at the forefront of our daily activities and decision-making processes.

Our commitments

As a company, we are committed to:

- Leveraging innovative technology, research, and education to provide world-class health treatment and care, with an aim to establish ourselves as a global benchmark in this field
- Establishing a place designed to provide those who live and work here with easy access to nature and the associated benefits for physical and mental health
- Creating a working and living environment that optimizes healthy lifestyles and offers a world-class system of personalized health care encompassing both prevention and treatment. This includes a zero tolerance policy to substance abuse
- Maintaining and promoting a health and wellness program for our employees that is benchmarked against the highest standards and best practices from across the world
- Ensuring our worker villages are equipped with fully staffed health facilities, such as clinics, but also include facilities for the maintenance of well-being, such as sports and entertainment venues
- Providing welfare teams to engage directly with workers and contractors on-site and in worker villages regarding issues of health, nutrition, and well-being in addition to safety
- Remaining mindful of downtime and work-life-balance as key factors in the maintenance of well-being, especially for those of us who both live and work on our sites

2. OUR PEOPLE

D Health and well-being

Our expectations

As NEOM representatives, we expect you to:



Understand our commitments to a healthier future and a healthy workplace, and help us to identify any activities or business decisions that go against these commitments



Strive to maintain a sustainable work-life balance, especially if you are both living and working on our sites, and aim to preserve the work-life balance of your team members if you are working in a leadership position



Embody our Values and bring 'Care' to your ways of working – not only for the natural environment but also for yourself and other colleagues



Contact your line manager, an appropriate senior colleague, or our Speak Up channel, if you feel that any aspect of your role is impacting negatively on your physical health, mental health, or well-being



NEOM

NEOM: Our Code of Conduct

3. OUR WORLD



CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources

3. OUR WORLD

A Human rights



Why it matters

Put simply, human rights are the basic freedoms that allow every human being to prosper and thrive. So, at NEOM, we believe in the importance of respecting human rights, as a fundamental aspect of our mission to become an 'accelerator of human progress.'

Our commitments

As a company, we are committed to:

- Adhering, at a minimum, to all applicable local and international human rights laws and regulations (and go beyond these basic requirements by meeting best practice standards wherever we can)
- Promoting and providing a healthy, safe, and secure working environment for all those working with us or for us, ensuring that this environment is respectful, inclusive and based on our Values, and paying particular attention to the rights of vulnerable groups, such as migrant workers
- Making sure, at a minimum, that everyone working on our sites has a contract in line with basic international standards and receives all the benefits to which they are contractually entitled
- Preventing human trafficking, child labor, and modern slavery from taking place in any form across our own business operations and supply chains
- Respecting the rights of individuals whose data we hold in line with applicable privacy laws and regulations, such as the right to obtain copies of personal data and correct or erase personal data (see '[Data privacy](#)' section)
- Assessing our suppliers as needed for compliance with our labor protection requirements and working with our suppliers, where issues are identified, to help them improve
- Monitoring our activities continuously for any new or developing human rights risks we need to be aware of, making sure we respond appropriately to any relevant risks identified

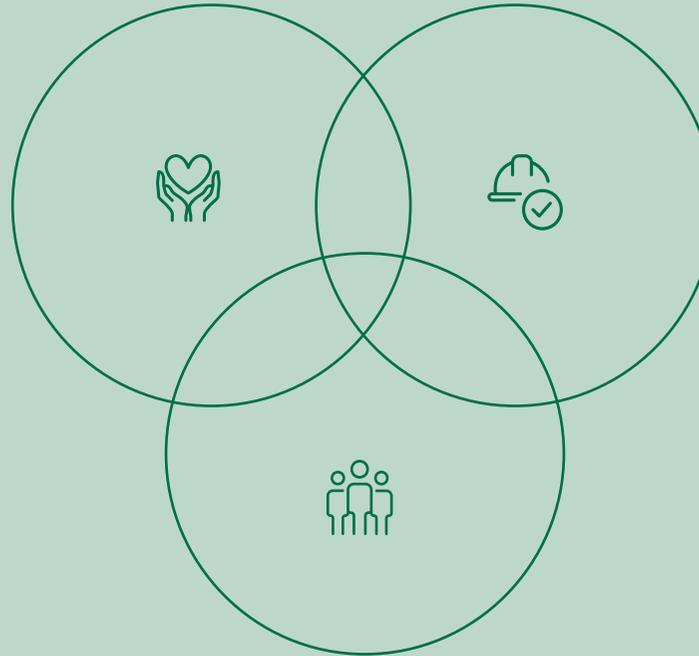
3. OUR WORLD

A Human rights

Our expectations

As NEOM representatives, we expect you to:

Live our Values and ensure that you treat everybody working with us with dignity, respect, and fairness in your daily working life



Understand our commitments to a healthy, safe, respectful, and inclusive working environment, and help us to address any activities or business decisions that go against them, by contacting your line manager, a member of the Compliance Department, or our Speak Up channel with any concerns that you may have

Help us to ensure our partners share our commitments, by assessing and monitoring them (as well as simply talking to them about our standards), if you are working in a related role

3. OUR WORLD

A Human rights

Q

I work on one of our construction sites. We recently engaged a third-party construction company to provide a large number of additional laborers from abroad. We're working against some tight deadlines here and could really use the extra help. Their workers have been on site for a few days now and the results are great – things are moving along so much faster than before! My only concern is that they seem to work constantly. I've never seen them take any breaks, not even during the hottest part of the day. They have their own supervisor, but he tells me that's normal where they come from, and I shouldn't worry about it. I figure he knows better and, at the end of the day, we're talking about third parties here, not NEOM employees. So, I'll put it out of my mind for now and look forward to finishing the project. I mean, it's none of my business, right?

A

Wrong. We are committed to providing a healthy and safe environment for all those working on our sites. This includes third-party contractors. Where migrant workers are concerned, we need to pay particular attention to their working conditions, as they could be more vulnerable than others to mistreatment. If you feel that our commitments to a healthy and safe working environment are not being upheld by our partners, you need to let us know. You can do so by contacting your line manager, a member of the Compliance Department, or our Speak Up channel. If your job involves working alongside third parties regularly, you can also help us to ensure these partners share our human rights commitments, by communicating our standards regularly and helping them to improve.



Further information

More information is available in our:

[SAFETY POLICY AND EXECUTIVE SAFETY COMMITTEE CHARTER](#)
[PEOPLE POLICIES](#)

You can also contact the Compliance Department with any questions regarding our approach to human rights.

3. OUR WORLD

B Environment



Why it matters

NEOM is being designed with the future of the Earth in mind.

As we reach a critical moment in humanity's mission to save the planet, NEOM has a unique opportunity to redesign how we think about our ability to achieve this goal. We need to put this responsibility toward the planet at the forefront of our daily decision-making and working lives. Our environmental targets are ambitious. This means that we will need your support and engagement in order to help us achieve them.

Our commitments

As a company, we are committed to:

- Recognizing and preserving the right to a safe, clean, healthy, and sustainable environment for all those living and working with us
- Working to reduce our emissions, achieving carbon neutrality by 2030, and becoming climate positive thereafter, by removing from the atmosphere more emissions than we produce
- Creating the world's first large-scale 100% renewable energy system, to serve the energy needs of NEOM's residents and industries using entirely renewable resources
- Leading globally in conservation, designating 95% of our marine and land territory as protected areas
- Striving for net positive biodiversity, by rewilding our local habitats with native plants and animals
- Striving to establish a circular water supply to serve NEOM's communities and industries, with zero liquid discharge into our marine environment
- Retaining the value of our resources by establishing a 'circular economy' based on reusing key materials and eliminating waste
- Aiming to ensure that we do not exceed the equivalent of 1 Earth per capita* in the environmental footprint of our residents
- Creating world-class outreach programs to inspire responsible consumption, reaching 100% of our population per year by 2030
- Embedding sustainability into every facet of our development, from concept through to delivery, by aiming to ensure that 100% of developments are built to NEOM's standards of sustainable design
- Ensuring our partners understand these commitments and share our goals

*'Earth per capita' is used to define an individual's environmental footprint. It indicates the number of Planet Earths it would take to support the impact of humanity as a whole if everyone lived like that individual.

3. OUR WORLD

B Environment



Our expectations

As NEOM representatives, we expect you to:

- First, do no harm. Take pride in our environmental commitments and avoid any personal actions or business decisions that could impact negatively on the planet
- Ensure you understand, align with, and act as champions for our environmental commitments in your daily life as an employee and citizen of NEOM – it's the only way that we will be able to make them a reality
- Remember that one of our Values is to 'Care' for the environment, leave it in a better place for future generations, and value all forms of life
- Help us to protect our environmental commitments, by speaking up if you notice any behaviors or business decisions that go against them
- Help us to identify any changes in our working procedures that could serve to make a more positive impact on the environment
- Regularly communicate our environmental commitments and expectations to third parties, to help ensure that our partners understand and share our goals

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources

3. OUR WORLD

C Local communities



Why it matters

For NEOM, stakeholder relationships are the foundation of our success. It is therefore essential that both existing and emerging communities in the NEOM region are treated with respect. While paving the way to a new age, we are fully conscious of our obligations toward the region's traditions and culture.

Our commitments

As a company, we are committed to:

- Respecting existing communities and cultural heritage within our region
- Ensuring that those affected receive timely, accurate, adequate, and relevant information regarding our activities and can participate in transparent stakeholder engagement processes
- Ensuring compliance with international standards such as those of the International Financial Corporation (IFC) for any resettlement practices
- Integrating local community members into the NEOM business ecosystem by creating employment opportunities for local workers through training, upskilling, and placement programs
- Empowering local young people to unlock their potential by providing life-changing education opportunities to prepare them for the jobs of the future

3. OUR WORLD

C Local communities

Our expectations

As NEOM representatives, we expect you to:



Remember that 'Respect' is one of our Values, and you should always act with honesty, integrity, and fairness in your interactions with the communities around us



Apply the highest standards of social responsibility, for example by partnering and getting involved with local charitable organizations wherever possible



Understand our commitments to the communities around us, and report any behavior or business decisions that go against these commitments



Be sensitive to the needs and views of local communities in your daily working life, escalating any related concerns to an appropriate senior colleague or our Speak Up channel where necessary



Further information

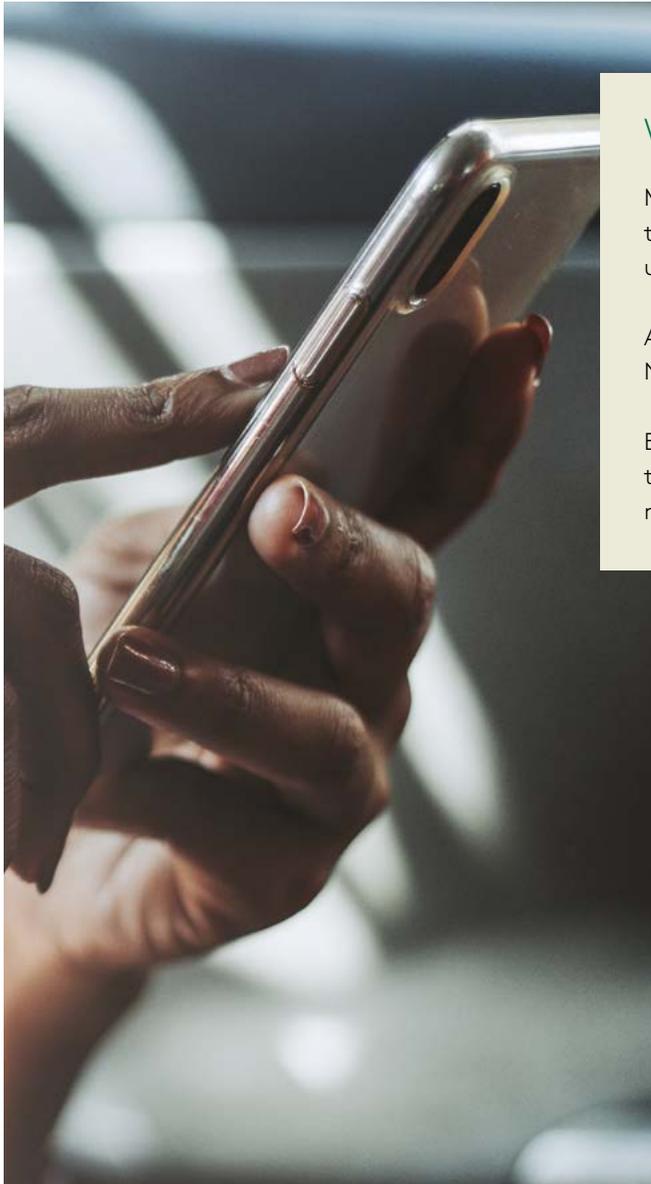
More information is available in our:

STAKEHOLDER RELATIONS POLICY

You can also contact the Compliance Department with any questions regarding our approach to local communities.

3. OUR WORLD

D Communicating with the media and use of social media



Why it matters

Media networks provide NEOM with an important opportunity to share our vision for the future with others. However, they also represent a powerful tool that needs to be used responsibly.

As an ambitious project attracting attention from across the world, it is vital that all NEOM's communications are consistent and align with our vision, strategy, and Values.

Establishing clear processes for interacting appropriately with the media will allow us to communicate our vision in a way that provides the public with clear, accurate, and reliable information.

Our commitments

As a company, we are committed to:



Providing the public with clear, accurate, and reliable information



Establishing strong relationships with external stakeholders based on regular, clear, and open communication



Maintaining and communicating clear internal guidelines for best practice in the use of social media and clear internal policies on how NEOM content can be shared online

3. OUR WORLD

D Communicating with the media and use of social media



Our expectations

As NEOM representatives, we expect you to:

- Ensure that you do not share personal views from your social media account that could appear to be expressed on behalf of the company
- Seek approval from the Marketing and Communication Department if you are unsure about using NEOM-related content on your personal social media channel
- Remember when using social media that you are an ambassador for NEOM, and you should not make any public statements that could cause damage to our reputation
- Never disclose any of NEOM's confidential information when posting online
- Politely decline any approaches from the press, and refer them to the Marketing and Communication Department
- Seek approval from the Marketing and Communication Department, and the Compliance Department, before accepting any speaking engagements

Talk to us. If you are unsure of how to speak about NEOM publicly, contact your manager, or an appropriate senior colleague in our Marketing and Communication Department. For social media content queries, email the Social Media team at socialmedia@NEOM.com.

Further information

More information is available in our:

[MARKETING AND COMMUNICATION POLICY](#)

[CONFIDENTIALITY POLICY](#)

However, you can also contact the Social Media team if you have any questions about the use of social media, or the Communication team, if you have any questions about communications with the media.



NEOM

NEOM: Our Code of Conduct

4. OUR TECHNOLOGY



4. OUR TECHNOLOGY

A Responsible innovation and use of technology



Why it matters

NEOM is being designed with a focus on innovation and technology. As a hub for innovation, entrepreneurs, business leaders, and companies will come to NEOM to research, incubate, and commercialize new technologies and enterprises in ground-breaking ways.

With this unprecedented technological potential comes a duty to ensure that all our innovations are not just achieved, but achieved responsibly. The commitments that follow set out what we mean by this.

As pioneers, we understand that we are operating on the frontiers of what is technologically possible. Although we are therefore often working in an unpredictable environment, our commitment to acting ethically and to responsible innovation and use of technology remains a constant.

Our commitments

As a company, we are committed to:

- Using our innovations to meet the most pressing global challenges of our time, for example by developing smart, technology-driven climate solutions for local implementation and global export
- Developing human-centered technologies that not only enhance livability but also enable residents and visitors to reduce their negative environmental impact
- Allowing NEOM residents to become participants in the development of new technologies, by establishing ourselves as a 'living laboratory' in which the life-changing technologies of the future can be pioneered
- Developing clean technology screening criteria to ensure our technological developments don't impact negatively on the environment
- Continuously seeking new technologies and advancements that enhance the safety of all those who choose to live and work with us (see '[Promoting safety](#)' section)
- Developing the world's most advanced 'cognitive city,' by acting as responsible stewards of personal data and using data-sharing to produce positive outcomes that change the way we live (see '[Data privacy](#)' section)
- Ensuring all projects involving artificial intelligence (AI) are developed responsibly and used to generate positive human-centered outcomes, such as AI-enabled medical diagnostics

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

4. OUR TECHNOLOGY

A Responsible innovation and use of technology

Our expectations

As NEOM representatives, we expect you to:

- Walk the talk, by maintaining the highest standards of integrity, robustness, objectivity, and transparency in all innovations and collaborations with external partners
- Understand our commitments to responsible innovation and use of technology, and speak up if you encounter any actions or business decisions that go against them
- Ensure that accurate records of our research are maintained, showing how our research has been conducted and used to inform our decisions
- Never collaborate with third parties on new innovations or technologies without the necessary approvals
- Never speak publicly or to third parties about developing innovations or technologies that have not yet been approved for external communication
- Ensure relevant partners understand and follow our commitments on responsible innovation and use of technology, if you are working in a related role
- Ensure that any invention, composition, or other form of intellectual property you create as part of your employment at the company is registered to NEOM

Talk to us. If you have any questions or concerns regarding our commitment to responsible innovation and use of technology, please talk to your line manager, or a member of the Compliance Department.



Further information

More information is available in our:

LEGAL POLICY

ACCEPTABLE USAGE STANDARD

DATA PRIVACY STANDARDS

SAFETY POLICY AND EXECUTIVE SAFETY COMMITTEE CHARTER

You can also contact the Compliance Department with any questions regarding our approach to responsible innovation and use of technology.

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources

4. OUR TECHNOLOGY

B Cybersecurity



Why it matters

As drivers of world-leading innovation, technology is at the heart of everything we do. Cybersecurity is how we protect our technology from unauthorized access and compromise.

Our commitments

As a company, we are committed to:

- Maintaining the highest standards of cybersecurity, in line with all applicable national and sector-specific regulations, as well as relevant international standards and leading practices
- Creating a cyber-secure environment by putting in place security measures that reduce the risk of a successful cyberattack on us and provide a coordinated response to any incidents
- Empowering NEOM representatives to uphold our cybersecurity standards by raising their awareness of relevant threats and how these can be prevented
- Requiring third-party suppliers to provide reasonable assurance of their ability to adhere to our relevant cybersecurity requirements
- Embedding cybersecurity into our entire service life cycle to ensure that compliance is continuous

4. OUR TECHNOLOGY

B Cybersecurity

Our expectations

As NEOM representatives, we expect you to:

- Beware of phishing and other kinds of 'social engineering' designed to trick you into making cybersecurity mistakes, for example by clicking on links or opening attachments from seemingly legitimate sources
- Use appropriate password protection for any files containing sensitive business data, ensuring passwords are secure and regularly updated in line with the guidance set out in our password policy
- Avoid sending external emails containing confidential or sensitive information, and never use cloud storage services to store, alter or exchange company information without the required permissions
- Install only approved software on NEOM devices and ensure the latest security updates are applied to any software being used on our system
- Understand that remote working brings additional cybersecurity challenges and follow all related guidance in our IT Policy when using NEOM devices off-site
- Never use personal email accounts to exchange company information with third parties or forward company related emails to a personal account
- Inform your line manager immediately if you encounter or suspect a cybersecurity breach



Look after your devices.

Protect your NEOM devices from any kind of physical theft or unauthorized access and report any related incidents to the Cybersecurity Department.

Talk to us.

If you have a related question or are unsure how to keep your NEOM devices safe from cyber threats, you can talk to your line manager or contact Cybersecurity Department.

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources

4. OUR TECHNOLOGY

B Cybersecurity

Q

I've been working late a lot recently on a new project with some third-party contractors. It's Thursday night and I'm finally about to leave for the weekend. All I need to do is send some project information to our external partners, so that they can review it first thing on Sunday morning – but the attachments are too big! My colleagues have already left and I'm eager to leave as well, but I can't figure out how to make my attachments any smaller. Then I remember that my personal cloud storage account allows me to upload files and share them through a link, without the need for any attachments. Great! I'll send the files that way, then get out of here. It's the best thing I can do in the circumstances, right?

A

Wrong. As part of our cybersecurity controls, we never use cloud-based data storage services to upload or share company-related information. Your manager would rather have you do the right thing – if you are struggling to send the materials through our email system due to their size, you should wait for Cybersecurity Department support on Sunday rather than sending the attachments out of compliance with our procedures.



Further information

More information is available in our:

CYBERSECURITY COMPLIANCE FRAMEWORK

IT POLICY

ACCEPTABLE USAGE STANDARD

However, you can also contact the Cybersecurity Department with any concerns or queries regarding our approach to cybersecurity, or the IT Department for other IT-related concerns or queries.

4. OUR TECHNOLOGY

C Data privacy

Why it matters

As pioneers of the world's most advanced 'cognitive city,' NEOM will be entrusted with a large amount of personal data. We therefore have a duty to act as responsible stewards of this data, maintaining trust and transparency with those whose data we handle.

At NEOM, we believe in data-sharing for good and this means using data to produce outcomes that benefit humanity and make the world a better place. We also need to remember that 'Respect' is one of our Values, and we should ensure that this Value is upheld when we receive and process the personal data of others.

By 'personal data,' we mean any information that relates to a living person and that, when put together, could be used to identify them or make their identity available.



Our commitments

As a company, we are committed to:

- Maintaining the highest standards of data privacy, ensuring all personal data is collated and processed in compliance with applicable data privacy laws and regulations
- Holding personal data, according to defined retention periods, to satisfy the legitimate purposes for which it was collected
- Sharing personal data only where necessary and in line with all applicable laws and regulations
- Respecting the rights of individuals whose data we hold in line with applicable laws and regulations, such as the right to obtain copies of personal data and correct or erase the personal data we hold
- Using technology to increase transparency around the personal data processing we undertake, and empowering those whose data we handle by improving their ability to monitor and select how their data is used
- Training our colleagues on our data privacy standards so that they understand the company's approach to respecting personal data (we can't maintain our high standards without you)
- Ensuring that any third parties handling personal data on our behalf understand and apply our data privacy standards, for example by signing a data processing agreement
- Protecting the personal data of our partners as if it were our own
- Taking data privacy into account from the start, by ensuring that all new technologies we develop follow our high data privacy standards from day one
- Taking a risk-based approach to processing personal data, making sure that the highest-priority data is subject to any additional controls necessary to keep it secure
- Maintaining robust cybersecurity controls to protect the data we hold from any form of unauthorized access (see '[Cybersecurity](#)' section)

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources

4. OUR TECHNOLOGY

C Data privacy

Our expectations

As NEOM representatives, we expect you to:



Understand our data privacy commitments, ensuring you handle all relevant personal data responsibly and in compliance with all applicable data privacy laws and regulations



Treat the personal data of others with the same care and privacy as if it were your own



Inform your line manager or use our Speak Up channel if you encounter or suspect a personal data breach, or any behaviors that go against our data privacy commitments



Talk to us. If you have any queries about our data privacy standards, you can contact your line manager or the Data Privacy Office.



Further information

More information is available in our:

DATA PRIVACY STANDARDS

IT POLICY

**ACCEPTABLE USAGE
STANDARD**

However, you can also contact the Data Privacy Office with any queries related to our data privacy commitments.



NEOM

NEOM: Our Code of Conduct

5. OUR RESPONSIBLE BUSINESS PRACTICES



5. OUR RESPONSIBLE BUSINESS PRACTICES

A Anti-bribery and anti-corruption

CONTENTS

Introduction

1. Our Values

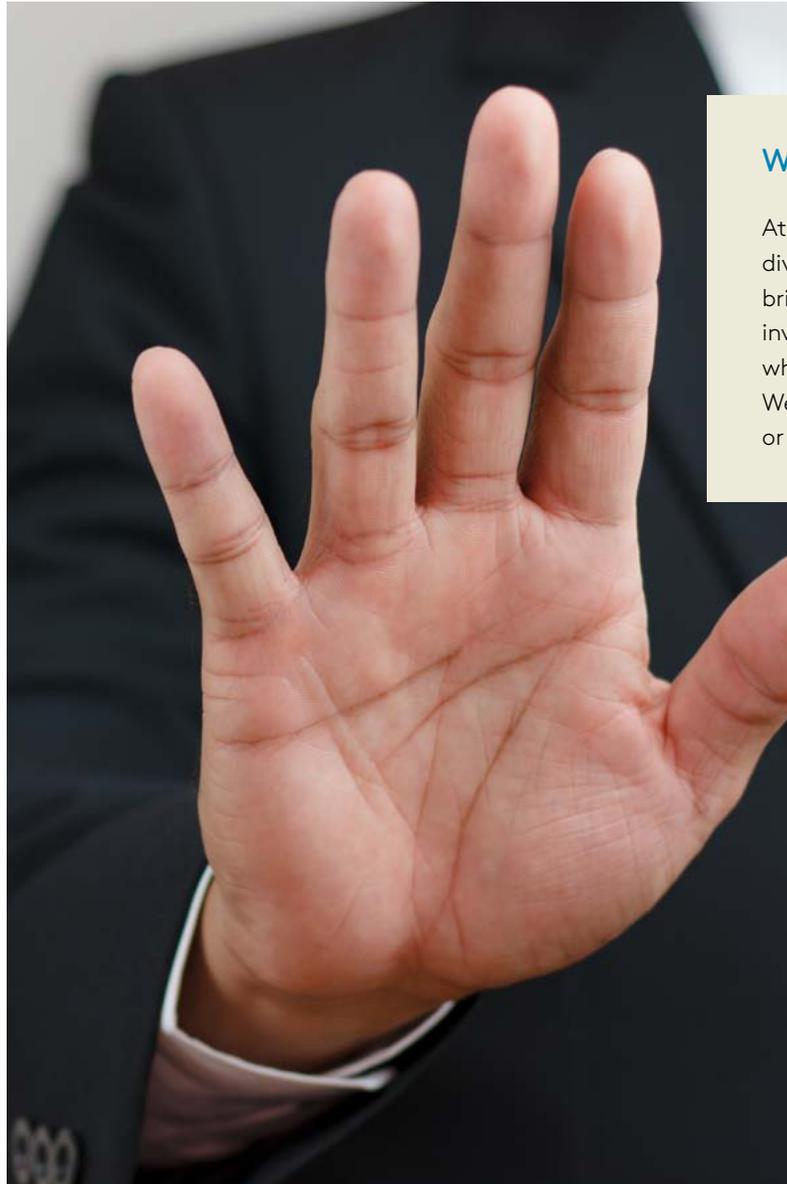
2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources



Why it matters

At NEOM, we recognize that bribery and corruption have the potential to divert resources, prevent development, and make societies less fair. Any acts of bribery or corruption would also damage our reputation, destroy stakeholder or investor trust and harm our ability to set a global example as 'a new vision of what the future could be.'

We are therefore committed to a zero tolerance position on bribery or corruption in any form.

A bribe is anything that has a value to the person receiving it and that could be seen as an attempt to influence them into providing favorable treatment. Bribery is not just about cash. It could also include gifts, entertainment, charitable donations, or other favors.

Facilitation payments are another type of corrupt payment. They are (usually) small sums paid to public officials as a way of encouraging them to carry out their ordinary duties, or carry them out more quickly. This might be a payment made to a border official, for example, to obtain customs clearance in a shorter time than normal.

5. OUR RESPONSIBLE BUSINESS PRACTICES

A Anti-bribery and anti-corruption



Our commitments

As a company, we are committed to:

- Implementing the highest standards of integrity and complying with applicable anti-bribery and anti-corruption laws and regulations
- Establishing and maintaining anti-bribery and anti-corruption policies and procedures that set out the guidance to be followed by employees in preventing, detecting, and responding to all cases of bribery and corruption
- Responding with disciplinary action, up to and including termination, when faced with cases of bribery or corruption, and referring relevant cases to the public authorities for criminal prosecution where appropriate
- Ensuring all charitable contributions made by NEOM follow strict procedures designed to prohibit donations that could be seen as an attempt to improperly influence others in our favor
- Reinforcing our anti-bribery and anti-corruption standards to all employees and third-parties, through training and communication, and ensure they are totally supported if they resist a request to pay a bribe
- Conducting regular risk assessments to monitor our exposure to bribery and corruption risks, helping us to ensure that we understand these risks and that the mitigations we have in place are sufficient
- Monitoring our relationships with public officials, and any lobbying activities in particular, to ensure that these interactions remain free from facilitation payments, inappropriate gifts and hospitality (see '[Gifts and hospitality](#)' section) or any behavior that could be considered an attempt to gain an unfair advantage
- Assessing our third parties for bribery and corruption risks and ensuring third-party relationships are subject to additional due diligence, review, and approval where required
- Monitoring our third-party relationships through automated screening and daily adverse media checks to ensure that our understanding of relevant bribery and corruption risks is up to date
- Thoroughly investigating any cases of bribery and corruption reported to us, applying appropriate disciplinary measures to proven cases, and passing relevant cases to the public authorities where applicable

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

A Anti-bribery and anti-corruption

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

Our expectations

As NEOM representatives, we expect you to:

- Understand our zero tolerance stance against bribery and corruption of any kind, and help uphold our commitments in this area, by setting an example for others in ensuring you adhere to all applicable regulations and procedures
- Promote and uphold a culture of integrity at NEOM
- Never give, offer, or accept a bribe or corrupt payment of any kind, unless there is an imminent threat to your freedom or physical safety
- Follow all procedures designed to prevent charitable contributions from being used for corrupt purposes, if you are working in a related role
- Ensure our bribery and corruption commitments and the associated legal liabilities are communicated to our external partners, if you are working in a related role

Report any known or suspected cases of bribery or corruption as soon as possible, by contacting your line manager, a senior member of the Compliance Department, or our Speak Up channel.

Talk to us. If you have any questions, or are unsure what could constitute a bribe or corrupt payment, speak to your line manager or a senior member of the Compliance Department.



Further information

More information is available in our:

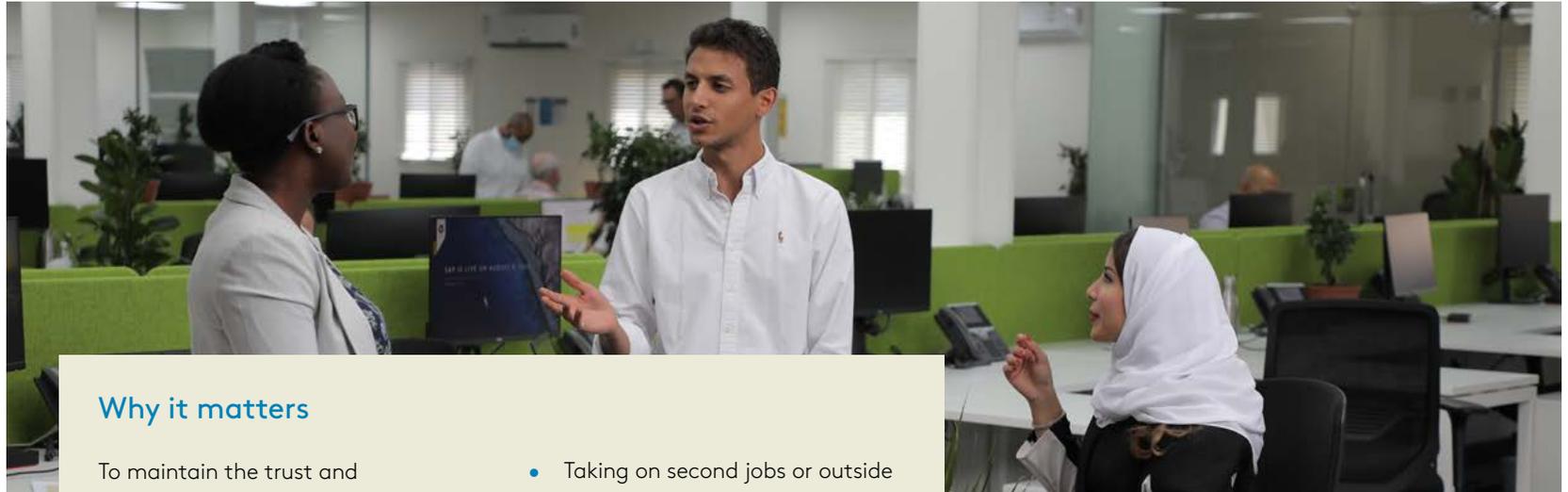
[ANTI-FINANCIAL CRIME POLICY](#)

[ANTI-BRIBERY AND CORRUPTION MANUAL](#)

However, you can also contact the Compliance Department with any queries or concerns you may have about bribery and corruption.

5. OUR RESPONSIBLE BUSINESS PRACTICES

B Conflicts of interest



Why it matters

To maintain the trust and confidence of our stakeholders, we need to ensure we always make decisions in NEOM's best interest. A conflict of interest is when our personal motivations conflict with NEOM's best interests as a company. A conflict of interest can take many forms but situations that could lead to a conflict of interest include:

- Line managing a relative or family friend
- Making procurement decisions regarding companies from which you profit personally
- Making recruitment decisions regarding candidates to whom you are personally connected

- Taking on second jobs or outside activities whose aims are in competition with ours
- Accepting the offer of becoming a member of a board, or sitting as a member, without prior approval

It doesn't matter if our intentions are good. Even a *perceived* conflict of interest can lead to accusations of unfairness, and even corruption, if not properly managed.

So, it's essential for us to declare all conflicts of interest, or situations that might lead to a conflict of interest, as we seek to maintain a workplace based on trust, fairness, and transparency.

Our commitments

As a company, we are committed to:



Properly recording and managing any conflicts of interest declared to us, in order to help us mitigate the risk of any unfair treatment or undue influence occurring as a result



Acting with fairness and ensuring that everyone gets the same opportunities at NEOM regardless of their personal connections or relationships



Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

B Conflicts of interest

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

Our expectations

As NEOM representatives, we expect you to:

- Protect our reputation and make all business decisions in the best interest of NEOM
- Avoid any situation or action that may lead to a potential or actual conflict of interest
- Never engage in outside activities or interests, such as second jobs, whose objectives compete with ours

Use good judgment and disclose any conflict of interest or potential conflict of interest to the Compliance Department, so that it can be properly managed.

Talk to us. If you have any questions or are unsure what could constitute a conflict of interest, talk to your line manager or a senior member of the Compliance Department.

Q

I work as a manager in our Marketing team. I've just been told that we'll be taking on a new staff member very soon and I couldn't be happier about it (things have been really busy around here!). The only issue is that my friend's daughter is applying for the job. My friend keeps reminding me about it, as if I'm going to make sure she gets hired, but I would never do that. I'm a professional. Yesterday, my boss asked me to help out with the selection process. I know this will probably involve interviewing my friend's daughter, but I have no intention of letting the relationship affect my decision-making, so I figure I'll keep it to myself. I mean, it's irrelevant, right?

A

Wrong. It doesn't matter if your intentions are good. If you get involved in the selection process and your friend's daughter is hired, it could lead to the accusation that you influenced the decision-making in her favor. If your boss is asking you to help out with this selection process, you should notify them, or a senior member of the Compliance Department, that this could lead to a perceived conflict of interest. You may then need to be separated from any decision-making involving your friend's daughter. However, this will help to keep our recruitment processes transparent and protect you from any accusation that you acted improperly.



Further information

More information is available in our:

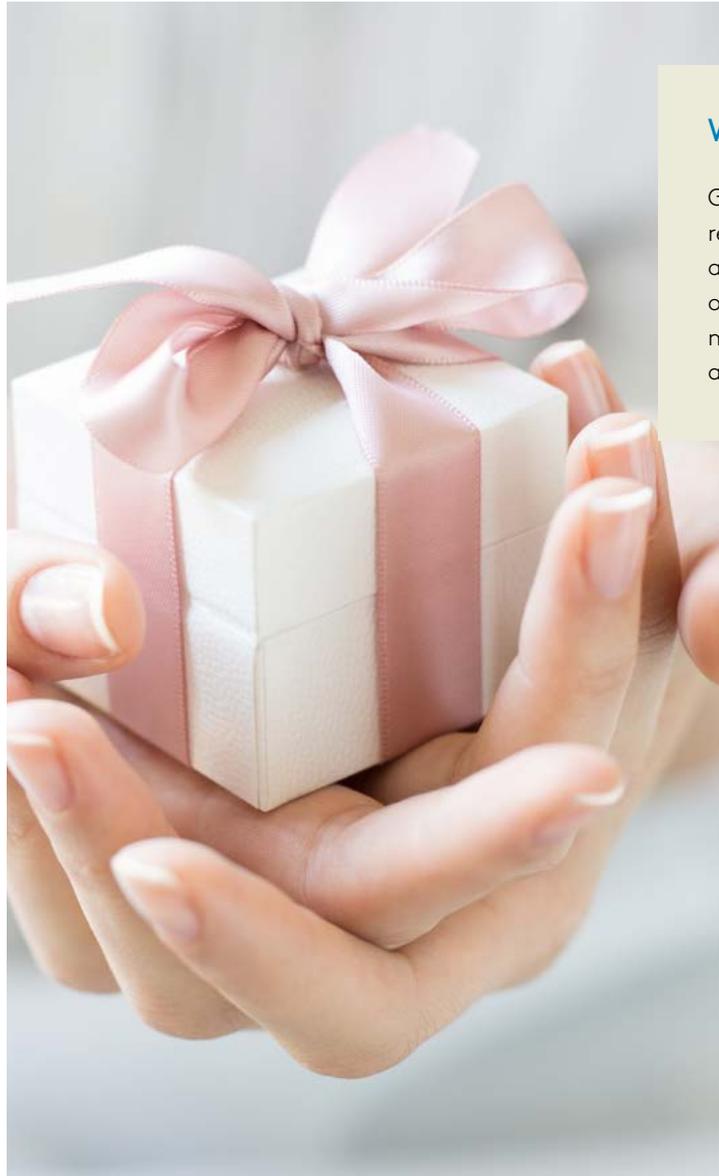
CONFLICT OF INTEREST POLICY

ANTI-BRIBERY AND CORRUPTION MANUAL

However, you can also contact the Compliance Department with any queries you may have about conflicts of interest.

5. OUR RESPONSIBLE BUSINESS PRACTICES

C Gifts and hospitality



Why it matters

Gifts and hospitality are often used by companies as a way of strengthening their relationships. However, they can also be seen as a way for companies to gain unfair advantage. At NEOM, we want to build relationships based on trust, integrity, and our vision of a new future unlike anything the world has seen before. Although we may sometimes be exposed to them in the course of our working lives, we believe in a responsible approach to gifts and hospitality, based on fairness and transparency.

Our commitments

As a company, we are committed to:



Ensuring that any exchange of gifts or hospitality in which we are involved is not conducted with the intention of receiving or providing an unfair advantage and does not exceed the thresholds specified in this Code without having first obtained the necessary internal approvals



Maintaining a central register allowing all gifts and hospitality to be transparently recorded and monitored



Conducting selective, risk-based monitoring of employee expenses in order to identify any lavish or excessive gifts or hospitality exchanged on the company's behalf



Investigating cases in which gifts or hospitality are found to be undeclared, excessive, or exchanged with the intention of receiving or providing unfair advantage, and following up with appropriate disciplinary measures and any other liabilities

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

C Gifts and hospitality

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

Our expectations

As NEOM representatives, we expect you to:

- Never accept gifts or anything of value that could be seen to affect your decisionmaking in relation to a third party, such as from current or prospective suppliers seeking to do business with us
- In certain circumstances, you may be able to accept low value gifts or 'giveaways' such as branded pens or coffee mugs or hospitality where:
 - this does not influence your decisions
 - the value of the gift or hospitality does not exceed SAR 400
- Never accept gifts in the form of cash or cash equivalents (e.g., shopping vouchers)
- Ensure any gifts or hospitality you offer are appropriate and in line with NEOM's policies. This applies equally to gifts and/or hospitality given or received internally within NEOM
- Take particular care in your interactions with public officials, ensuring that these interactions are fully transparent, properly documented and do not involve any exchange that could be seen as an attempt to gain preferential treatment or unfair advantage. You are permitted to accept gifts presented to you on official occasions involving governmental bodies, as a matter of courtesy and/or protocol. Official occasions can include meetings between NEOM and any state bodies. Such gifts may not be in the form of cash, and must not exceed a cash equivalent value SAR 400



Record any gifts or hospitality you offer or receive in the course of your work on the Gifts and Hospitality Register found on the NEOM Disclosures Platform, so that these can be properly recorded and monitored



Seek approval if any gift or hospitality you receive in the course of your work is over the value of SAR 400 in accordance with the [Gifts and Hospitality Policy](#)

5. OUR RESPONSIBLE BUSINESS PRACTICES

C Gifts and hospitality

Q

I work as a member of our Procurement team. I'm pretty new but everyone around here seems really nice – including our suppliers! I've been getting to know some of them quite well over the last few weeks, as we've been working on a big new tender, and they all have lots of questions to make sure they get their proposals just right. One of my regular contacts even sent me something for my birthday. Don't worry, it wasn't money. It wasn't even really a gift. They just sent me some online vouchers I can use next time I need to get some new clothes. I'd never let this kind of thing influence my decision-making (I'm better than that) – but I could really use a new pair of jeans. So, I think I'll use the vouchers, then let them know it was a really nice gesture, but it's not going to affect the outcome of the tender. It's the most responsible thing to do, right?'

A

Wrong. You should never accept anything of value that could be seen to affect your decision-making at NEOM, especially when this involves current or prospective suppliers seeking to do business with us. It doesn't matter if your intentions are good. If you accept the voucher and then this supplier wins the tender, you could be accused of providing unfair preferential treatment in exchange for the gift. It also doesn't matter that this gift didn't come in the form of cash or items purchased by your contact. You should never accept gifts in the form of cash equivalents, including shopping vouchers. In this scenario, you should politely decline the voucher and point out to your contact that NEOM's responsible business practices prevent you from accepting gifts from current or prospective suppliers during a tendering process. You should also record the offer of the voucher in line with the provisions of the [Gifts and Hospitality Policy](#). If you still have any questions, you can speak to your manager or the Compliance Department.



Further information

More information is available in our:

[GIFTS AND HOSPITALITY POLICY](#)

[ANTI-FINANCIAL CRIME POLICY](#)

[ANTI-BRIBERY AND
CORRUPTION MANUAL](#)

[CONFLICT OF INTEREST POLICY](#)

However, you can also contact the Compliance Department with any questions regarding our approach to gifts and hospitality.



Introduction

1. Our Values

2. Our People

3. Our World

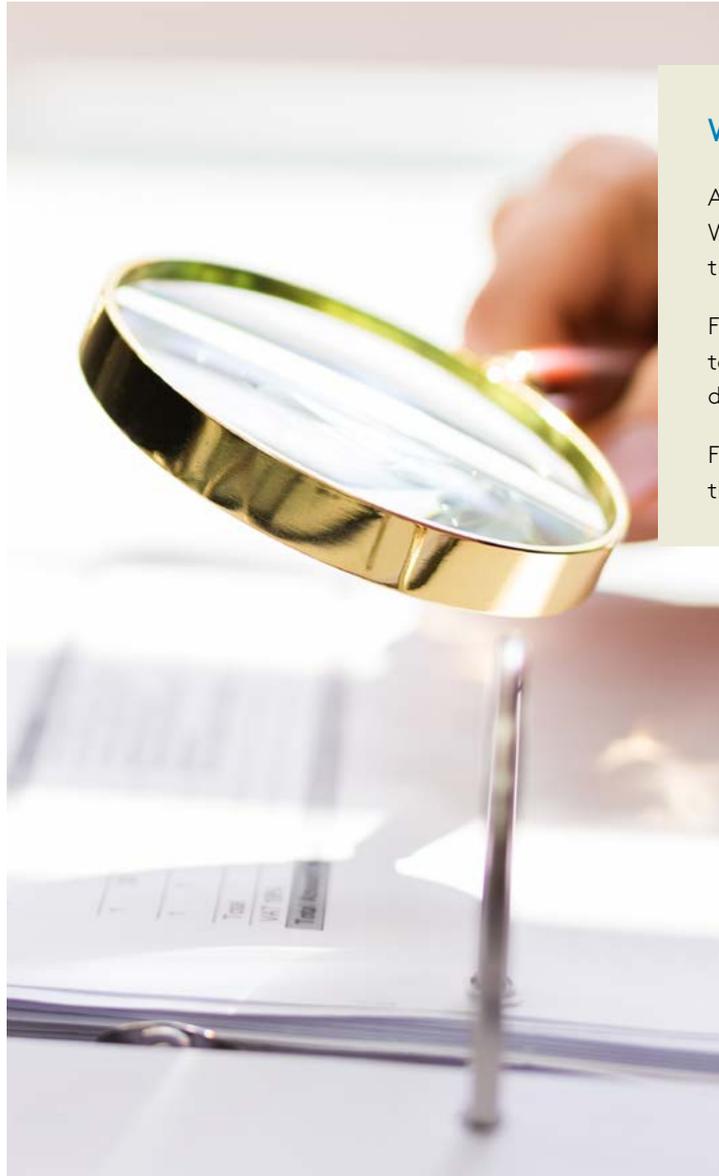
4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

D Countering fraud



Why it matters

At NEOM, our ambitions cannot be realized without the trust of others. We therefore have a duty to earn that trust every day, by operating with integrity, transparency, and honesty in everything we do.

Fraud is any act of deception intended to achieve personal gain or cause loss to others. Examples of fraud at work include embezzlement, theft, falsifying of documents, and misuse of NEOM assets, such as computers.

Fraud, and fraudulent activities, have the potential to damage our reputation and therefore our ability to win the trust on which our long-term goals depend.

Our commitments

As a company, we are committed to:

- Promoting honesty, integrity, and a zero tolerance stance against fraud of any kind
- Adhering to all applicable laws and regulations in relation to fraud and fraudulent activities
- Establishing and maintaining an anti-fraud policy that is aligned with applicable laws and regulations and sets out the rules to be followed by employees in preventing, detecting, and responding to any instances of fraud
- Adopting appropriate segregation of duties in our accounting practices, to help reduce the risk of fraudulent activities going unnoticed due to collusion or the actions of individuals
- Thoroughly investigating any cases of fraudulent activity reported to us, applying appropriate disciplinary measures to proven cases, and passing relevant cases to the public authorities where applicable

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

D Countering fraud

Our expectations

As NEOM representatives, we expect you to:

- Promote a culture of integrity at NEOM where fraud in any form is not tolerated
- Understand our zero tolerance stance against fraud of any kind, and help uphold our commitments in this area, by setting an example for others in ensuring you adhere to all applicable regulations and procedures
- Ensure that all NEOM property, such as computers, phones, and other hardware, is protected from theft and only used for legitimate work-related purposes in NEOM's best interests

Speak up! Contact your manager, a senior member of the Compliance Department, or our Speak Up channel as soon as possible if you know or suspect that any fraudulent activity is taking place.



Further information

More information is available in our:

[FINANCE AND ACCOUNTING POLICY](#)

[ANTI-FINANCIAL CRIME POLICY](#)

[ANTI-FRAUD MANUAL](#)

However, you can also contact the Compliance Department if you have any questions or concerns about fraud or potentially fraudulent activities within the company.



Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

E Fair competition

CONTENTS

Introduction

1. Our Values

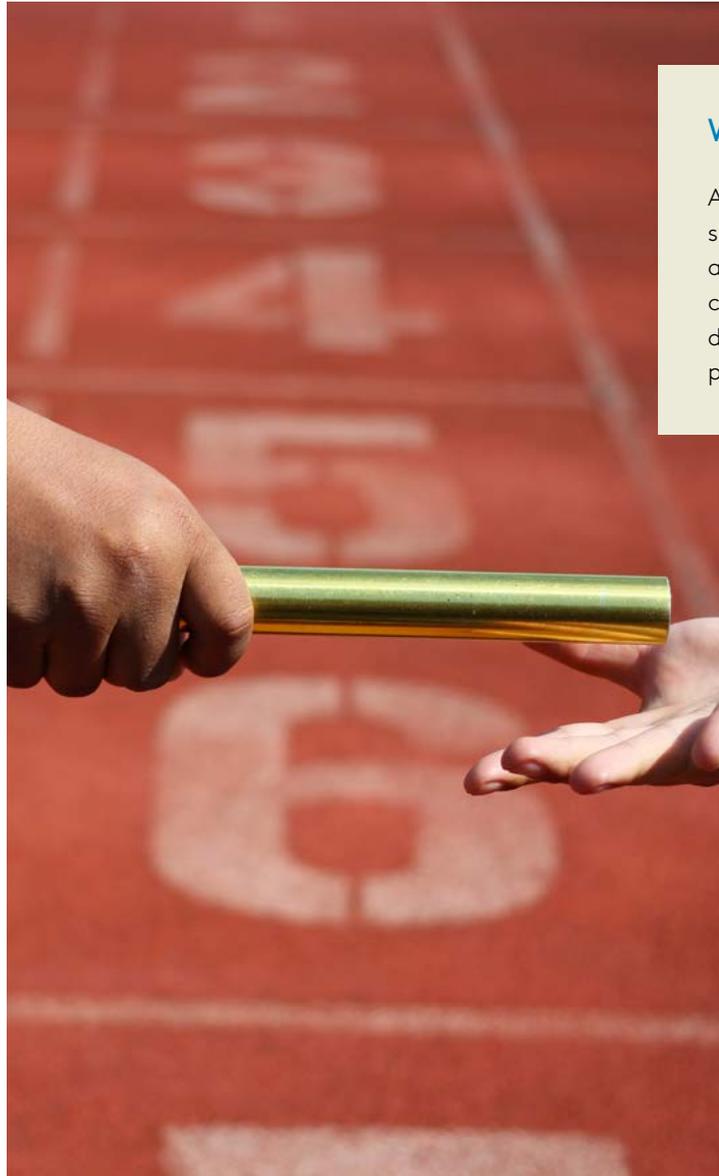
2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources



Why it matters

At NEOM, we want to build relationships based on quality, transparency, and a shared vision of what the future could be. It is therefore essential that we maintain a healthy spirit of competition in our processes for selecting third parties. Anti-competitive practices are not only illegal, but they also have the potential to damage our reputation and our ability to achieve our goals by selecting the best possible partners to work alongside us.

Our commitments

As a company, we are committed to:



Fostering a spirit of healthy competition in our procurement practices, with the goal of ensuring that our relationships are based on fairness, integrity, and transparency



Ensuring we only engage with third parties that share our standards regarding fair competition



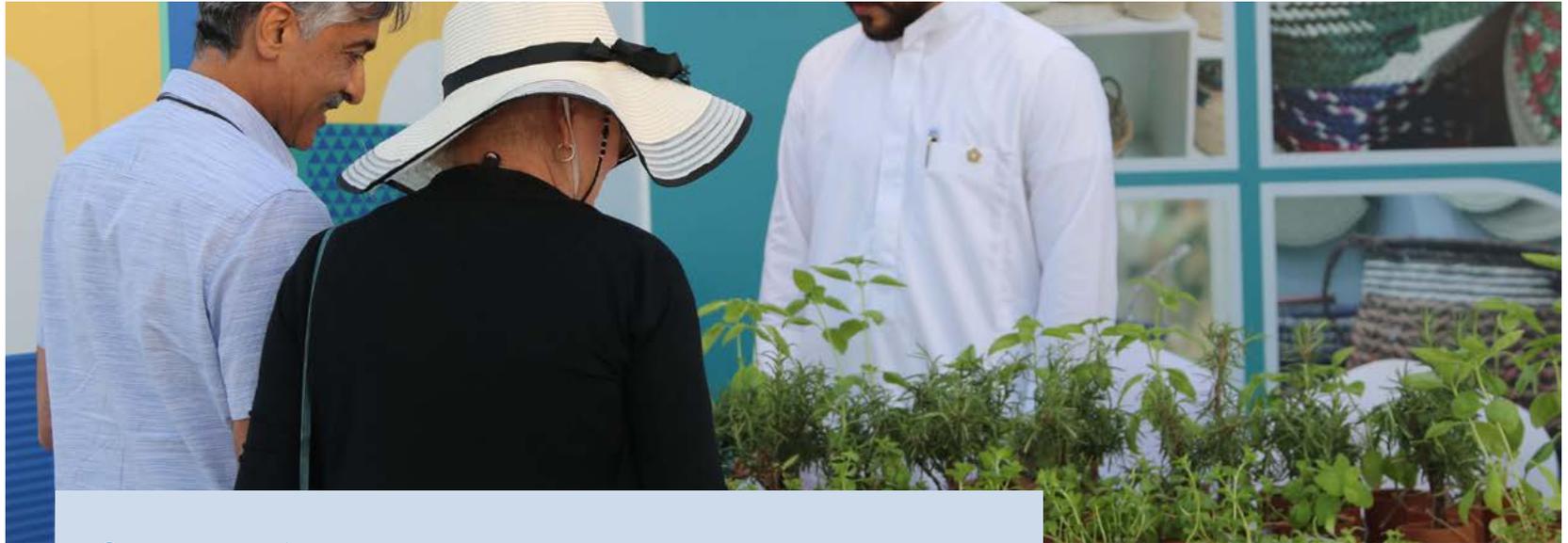
Upholding the integrity of our procurement practices and maintaining fairness in our treatment of third parties, allowing them to compete for NEOM's business on a fair and transparent basis



Not tolerating any form of anti-competitive practices among our current or prospective third parties

5. OUR RESPONSIBLE BUSINESS PRACTICES

E Fair competition



Our expectations

As NEOM representatives, we expect you to:



Understand our commitments to fair, honest, and transparent third-party selection processes, and ensure you always deal fairly with our third-party business partners and suppliers



Help us to uphold these commitments by communicating them to existing and prospective third parties if you are working in a related position



Handle confidential information with care, and never share confidential information regarding our existing or prospective partners with other third parties competing to work for us

Further information

More information is available in our:

PROCUREMENT POLICY

However, you can also contact the Compliance Department if you have any questions or concerns about our approach to fair competition.



Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

F Accurate books and records

CONTENTS

Introduction

1. Our Values

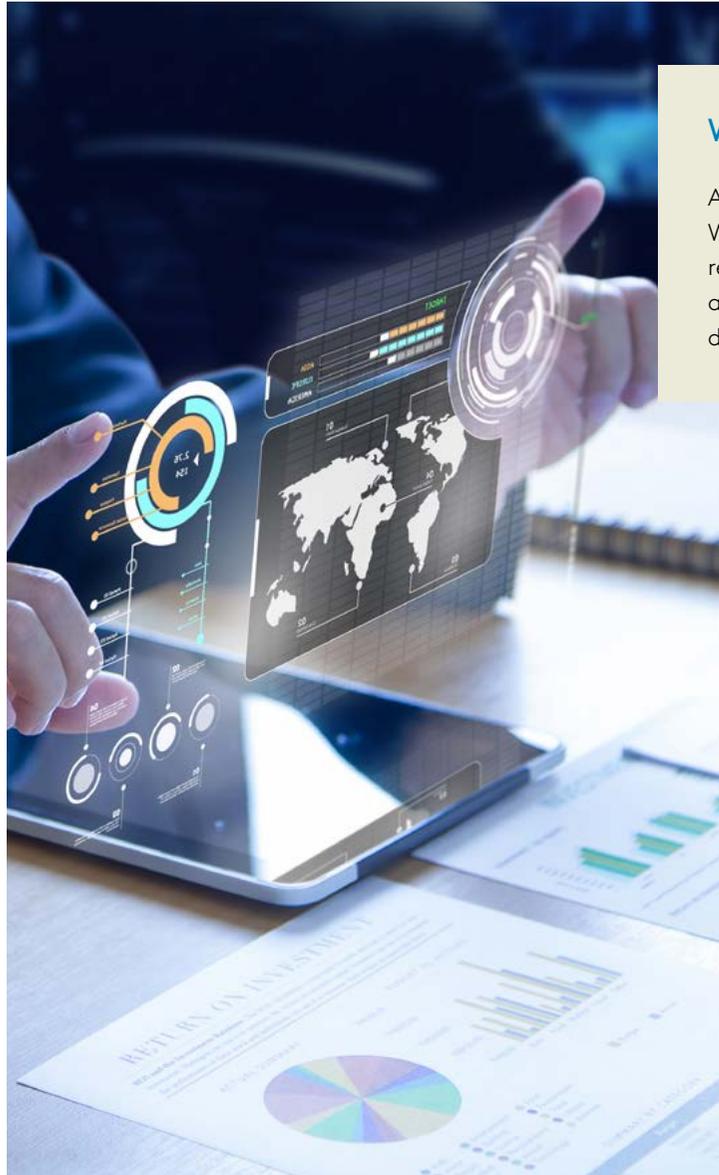
2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources



Why it matters

At NEOM, we believe in promoting honesty and integrity in everything we do. Without these crucial factors, we would be unable to win the trust we need to realize our big ambitions. This means committing to robust standards of precision and transparency, not only in our announcements to the media, but also in our daily maintenance of accurate books and records.

Our commitments

As a company, we are committed to:



Ensuring all transactions are clearly and accurately recorded in the necessary general ledgers and accounts, with no off-the-books accounts or transactions



Segregating our processes of record-keeping between various teams and team members, as per our delegation of authorities matrix, to help maintain accuracy and reliability



Ensuring all reports, documents, and communications disclosed to the public are full, fair, accurate, timely, and understandable

5. OUR RESPONSIBLE BUSINESS PRACTICES

F Accurate books and records



Our expectations

As NEOM representatives, we expect you to:



Do your part to ensure all NEOM's books, records, accounts, and reports are true, accurate and complete



Never falsify information or misrepresent material facts as you develop and maintain documents at work



Cooperate fully if an auditor reviews your team's financial statements or operations

Further information

More information is available in our:

[FINANCE AND ACCOUNTING POLICY](#)

[ANTI-BRIBERY AND CORRUPTION MANUAL](#)

[ANTI-FRAUD MANUAL](#)

[CONFIDENTIALITY POLICY](#)

However, you can also contact the Compliance Department if you have any questions or concerns about our approach to books and records.



Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

G Shareholder reporting

CONTENTS

Introduction

1. Our Values

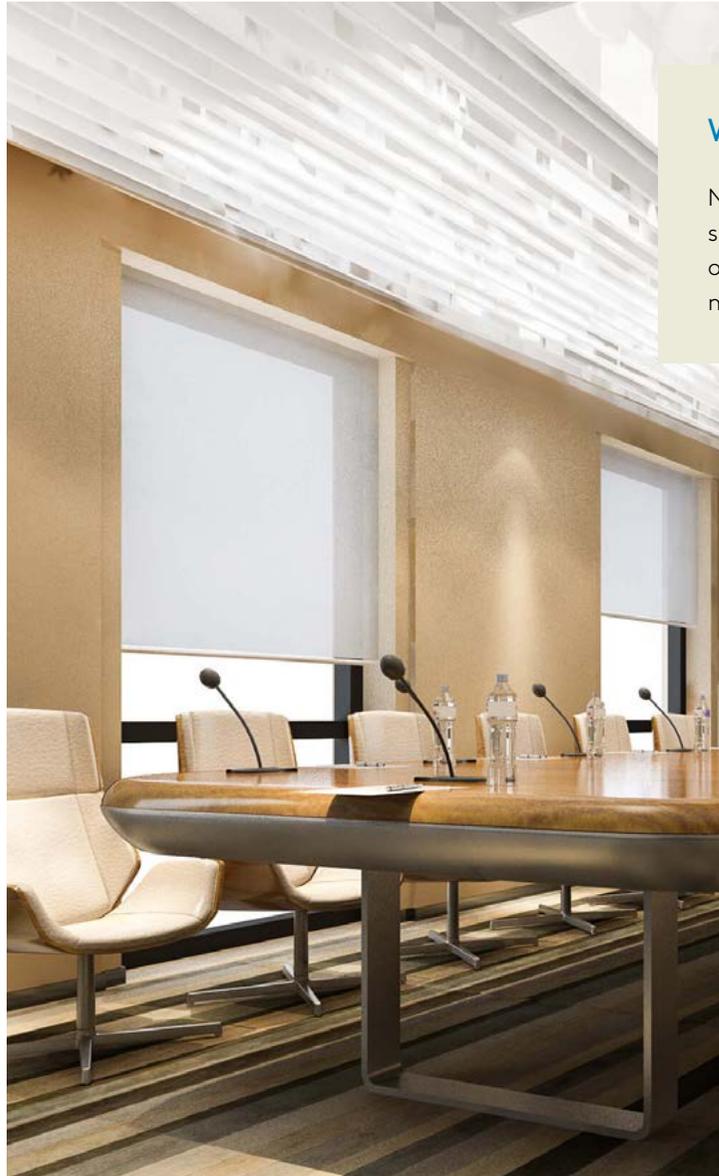
2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources



Why it matters

NEOM is committed to acting in the best interests of its shareholder and creating sustainable shareholder value. A fundamental part of this process involves providing our shareholder with the timely, transparent, and accurate information it needs to make decisions.

Our commitments

As a company, we are committed to:



Providing our shareholder with relevant information about our regular activities and business, such as our financial performance, in a timely and accurate manner



Keeping our shareholder informed of any fundamental developments at NEOM, such as the activation of a new sector or region, or the announcement of a new strategy



Proactively seeking feedback and suggestions for improvement from our shareholder and ensuring that there are no limitations for our shareholder to access information related to NEOM

5. OUR RESPONSIBLE BUSINESS PRACTICES

G Shareholder reporting

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources



Our expectations

As NEOM representatives, we expect you to:



Help us provide our shareholder with accurate information by maintaining accurate records of your work



Never communicate company information to NEOM's shareholder unless authorized to do so



Cooperate where necessary with the General Secretariat, which is authorized to communicate with our shareholder on our behalf

Further information

More information is available in our:

[DISCLOSURE AND TRANSPARENCY POLICY](#)

[STAKEHOLDER RELATIONS POLICY](#)

[MARKETING AND COMMUNICATION POLICY](#)

However, you can also contact the General Secretariat if you have any questions regarding our approach to shareholder reporting.

5. OUR RESPONSIBLE BUSINESS PRACTICES

H Confidential information

CONTENTS

Introduction

1. Our Values

2. Our People

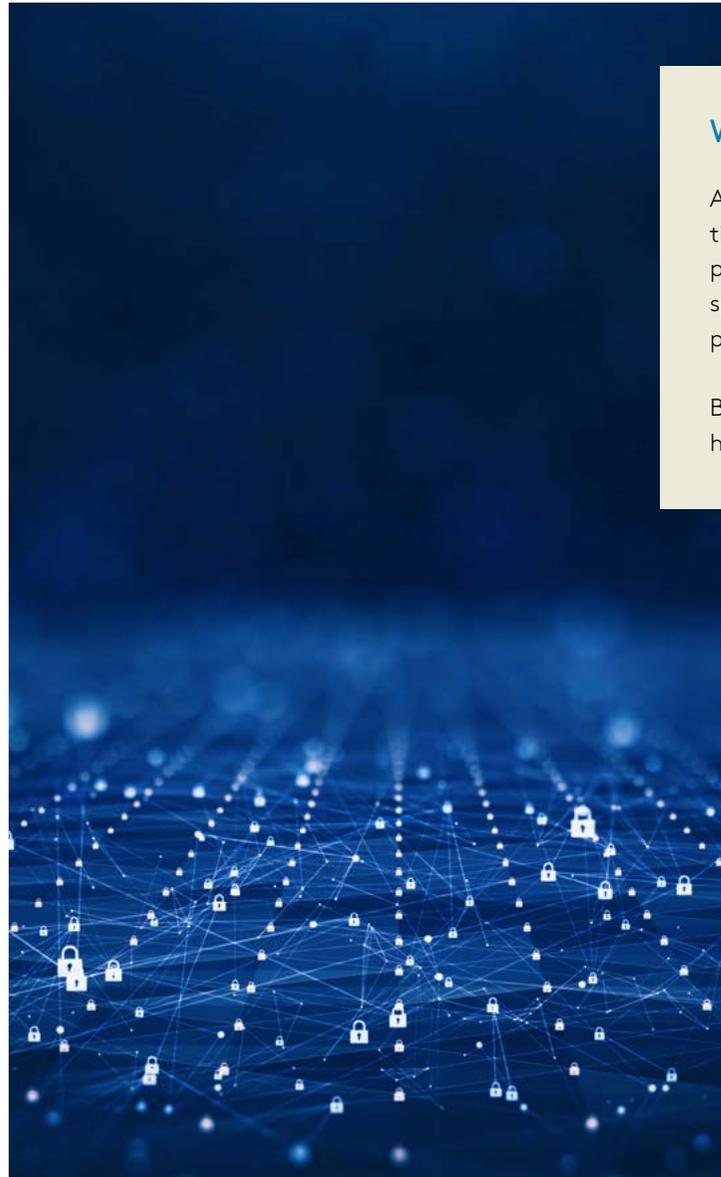
3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

NEOM: Our Code of Conduct



Why it matters

At NEOM, information and ideas are some of our most valuable assets. Ideas need time to grow. We therefore need to make sure we do not share ideas or information prematurely with others. When information is designated as confidential, it requires specific handling in order to ensure it does not set false expectations, affect our project launches, damage our reputation or impact negatively on our partners.

By confidential information, we mean all non-public information that may be harmful to NEOM or our stakeholders if disclosed.

Our commitments

As a company, we are committed to:



Maintaining policies and procedures to ensure that confidential information is handled appropriately and that employees understand their responsibilities in relation to these policies and procedures



Investigating all reported cases of confidential information being shared or handled inappropriately, and following up with appropriate disciplinary measures where necessary



Creating a robust cyber-secure environment to protect the confidential information we hold from unauthorized access or compromise (see '[Cybersecurity](#)' section)



Protecting the confidential information of our third parties as if it were our own (see '[Data privacy](#)' section)

5. OUR RESPONSIBLE BUSINESS PRACTICES

H Confidential information

Our expectations

As NEOM representatives, we expect you to:



Do your part to help us ensure that confidential information is protected, by understanding our commitments and following all related approvals, policies, and procedures



Take responsibility for the protection of any confidential information available to you and ensure it is not disclosed to any unauthorized person (inside or outside the company) or used for your own benefit, even after your employment with NEOM is over



Seek advice from NEOM Legal if you have confidential information related to potential partnerships, acquisitions, or deals NEOM is working on, and are considering buying or selling securities in any of those companies



Treat the confidential information of our partners as if it were our own, if you are working in a related role



Talk to us. Speak to your line manager or an appropriate senior colleague if you're unsure what might constitute confidential information or how it should be handled.



Further information

More information is available in our:

- [CONFIDENTIALITY POLICY](#)
- [INFORMATION CLASSIFICATION GUIDANCE](#)
- [IT POLICY](#)
- [DISCLOSURE AND TRANSPARENCY POLICY](#)
- [ACCEPTABLE USAGE STANDARD](#)

However, you can also contact the Compliance Department if you have any questions or concerns about our approach to confidentiality.

CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

1 Money laundering, terrorist financing, and sanctions

Why it matters

As we establish ourselves as a key economic player in the region, we have a duty to maintain visibility over our business relationships and transactions.

In particular, we need to be alert to the risks associated with money laundering, terrorist financing, and economic sanctions. Remaining vigilant to these risks will not only help us to ensure we comply with the law and regulations, but also to ensure we maintain a positive economic impact on the world around us.

Our commitments

As a company, we are committed to:



Meeting our obligations under all applicable national and international laws and regulations related to money laundering, terrorist financing, and economic sanctions



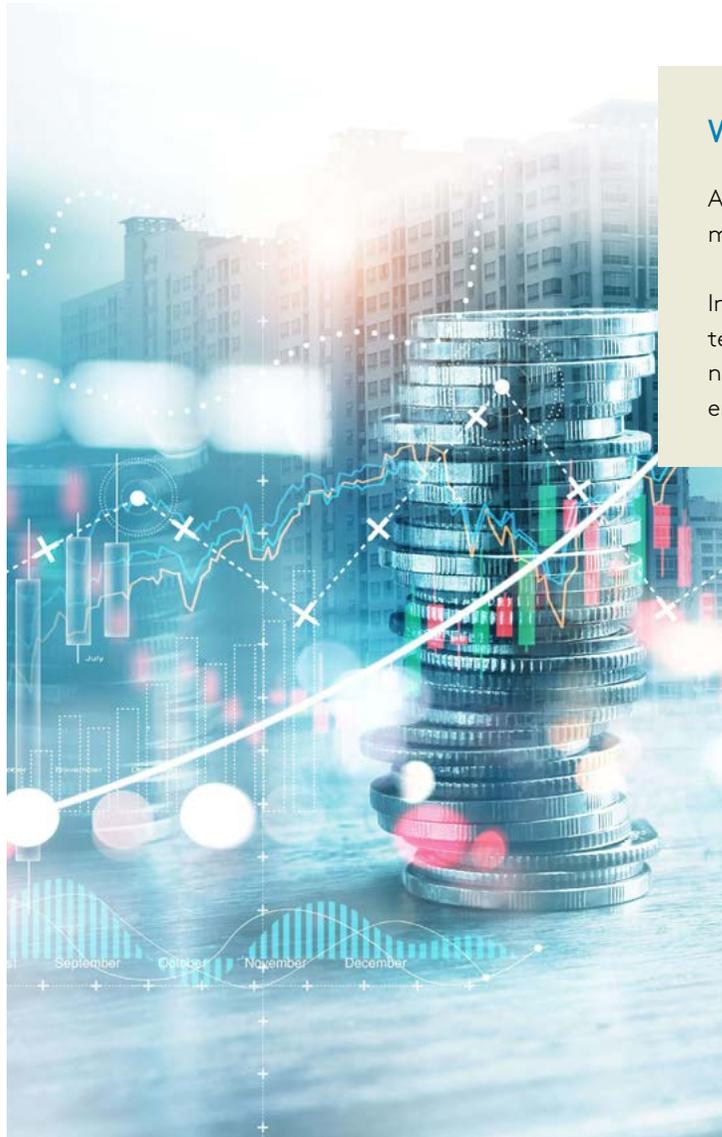
Implementing effective processes to identify and manage our exposure to risk in these areas and conducting regular testing of these processes to ensure they remain fit for purpose



Providing training and communication for employees in relevant positions regarding our money laundering, terrorist financing, and sanctions risks, and the processes we have in place to mitigate them



Conducting investigations in relation to any actual or suspected breaches of economic sanctions or applicable laws and regulations in the area of money laundering or terrorist financing



CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible Business Practices

Further Information and Resources

5. OUR RESPONSIBLE BUSINESS PRACTICES

1 Money laundering, terrorist financing, and sanctions

Our expectations

As NEOM representatives, we expect you to:



Understand our commitment to abide by all applicable laws and regulations related to money laundering, terrorist financing, and economic sanctions



Ensure you conduct the required training and follow our processes to identify and manage our exposure to risk in these areas, if you are working in a related role



Promptly report any money laundering, terrorist financing, or economic sanctions concerns to your line manager, an appropriate senior colleague, or our Speak Up channel



Speak up! If you are aware of any actions or business decisions that go against our commitments in this area, you should use the Speak Up channels set out in the 'Speaking up' section.



Talk to us. Speak to your manager or an appropriate senior colleague if you have any questions regarding our commitments or approach to money laundering, terrorist financing, or economic sanctions.



Further information

More information is available in our:

ANTI-FINANCIAL CRIME POLICY

However, you can also contact the Compliance Department if you have any questions or concerns regarding our approach to money laundering, terrorist financing, or sanctions.



NEOM

NEOM: Our Code of Conduct

FURTHER INFORMATION AND RESOURCES



FURTHER INFORMATION AND RESOURCES

More information on each of the subject areas covered in our Code of Conduct can also be found below.

SUBJECT	RESOURCES
The role of managers	<ul style="list-style-type: none"> People Policies
Diversity, equality, and inclusion	<ul style="list-style-type: none"> People Policies
Bullying, harassment, and sexual harassment	<ul style="list-style-type: none"> People Policies
Promoting safety	<ul style="list-style-type: none"> Safety Policy and Executive Safety Committee Charter
Human rights	<ul style="list-style-type: none"> Safety Policy and Executive Safety Committee Charter People Policies
Local communities	<ul style="list-style-type: none"> Stakeholder Relations Policy
Communicating with the media and use of social media	<ul style="list-style-type: none"> Marketing and Communication Policy Confidentiality Policy
Responsible innovation and use of technology	<ul style="list-style-type: none"> Legal Policy Acceptable Usage Standard Data Privacy Standards Safety Policy and Executive Safety Committee Charter
Cybersecurity	<ul style="list-style-type: none"> Cybersecurity Compliance Framework IT Policy Acceptable Usage Standard

SUBJECT	RESOURCES
Data privacy	<ul style="list-style-type: none"> Data Privacy Standards IT Policy Acceptable Usage Standard
Anti-bribery and corruption	<ul style="list-style-type: none"> Anti-Financial Crime Policy Anti-Bribery and Corruption Manual
Conflicts of interest	<ul style="list-style-type: none"> Conflict of Interest Policy Anti-Bribery and Corruption Manual
Gifts and hospitality	<ul style="list-style-type: none"> Gifts and Hospitality Policy Anti-Financial Crime Policy Anti-Bribery and Corruption Manual Conflict of Interest Policy
Countering fraud	<ul style="list-style-type: none"> Finance and Accounting Policy Anti-Financial Crime Policy Anti-Fraud Manual
Fair competition	<ul style="list-style-type: none"> Procurement Policy Confidentiality Policy
Accurate books and records	<ul style="list-style-type: none"> Finance and Accounting Policy Anti-Bribery and Corruption Manual Anti-Fraud Manual

 CONTENTS

Introduction

1. Our Values

2. Our People

3. Our World

4. Our Technology

5. Our Responsible
Business Practices

Further Information
and Resources

FURTHER INFORMATION AND RESOURCES

SUBJECT	RESOURCES
Shareholder reporting	<ul style="list-style-type: none">• Disclosure and Transparency Policy• Stakeholder Relations Policy• Marketing and Communication Policy
Speak Up matters	<ul style="list-style-type: none">• What to Expect During a Speak Up Matter
Confidential information	<ul style="list-style-type: none">• Confidentiality Policy• Information Classification Guidance• IT Policy• Disclosure and Transparency Policy• Acceptable Usage Standard
Money laundering, terrorist financing, and sanctions	<ul style="list-style-type: none">• Anti-Financial Crime Policy

Should you have any further questions or queries in relation to this Code, please contact the Compliance Department.

COMPLIANCE
MADE FOR GOOD