

Purpose

SKA requires maintaining the highest ethical standards of all the work performed within the Company. Therefore, this code of ethics is considered as an essential element of performance at SKA. Compliance with the requirements of this code is deemed an employment precondition, as SKA expects its employees to take their responsibilities to the highest ethical and professional levels.

The importance of promulgating the Code is to provide a guideline that assists employees in performing their tasks and achieving the highest level of required personal honesty and professionalism.

Applicability

This Code of Ethics is applicable to all employees, regardless of place of work and inclusive of management. Any employee shall not accept or contribute in any work that violates or contradicts the policies stated in the Code of Ethics. Accordingly, any violation to or contradiction with the policies of this Code shall be reported to the Human Resources department, and necessary disciplinary actions shall be taken, which may consequently lead to employment termination.

Violations

Any employee, who violates any professional ethic, will be subjected to disciplinary actions that may escalate to employment termination. Examples of behaviours that may result in further disciplinary actions are:

- a. Inciting others to violate the Code of Ethics.
- b. Negligence to submit complaints regarding confirmed or potential violation to the Code of Ethics (cheating or stealing).
- c. Refusal to attend investigations regarding breaches to the Code of Ethics.
- d. To mistreat an employee when he submits a complaint regarding a breach to the Code of Ethics.

Values and Ethics

An employee has to act with honesty, integrity and fair dealing with others and shall not make any inaccurate or misleading claims about any matters related to the activities of SKA, which may lead to conflict of interests.

SKA expects its employees to maintain honesty, integrity and good conduct along with complying with applied rules, regulations and policies, in a manner that does not affect the position and reputation of the Company or reflects negatively upon employees'

performance.

An employee of SKA shall persistently provide the highest level quality of services to customers, ensuring that they are satisfied with the provided services and show the positive image of the company.

1. Principle of Equal Employment Opportunities

The Equal Employment Opportunity policy of SKA affirms the right of every employee to participate in all aspects of employment regardless to race, color, nationality, sex, age, marital status, national origin or disability (provided it is not affecting performance).

The Company depends upon qualifications (experience, education, abilities and skills) and all other standards that are adopted as a base for selecting and evaluating employees and applicants. This principle shall be applied to all employment fields.

2. Management Responsibilities

- a. To ensure a work environment that ensures complying with the Code of Ethics, as follows:
 - (i) To directly supervise implementation of policies through holding periodical meetings and continuous monitoring.
 - (ii) Leadership shall be an example for employees through its ethics and behaviours.
 - (iii) Employees shall realise that obtaining results is not more important than complying with the Code of Ethics.
 - (iv) Encourage employees to ask any questions related to honesty or to raise a complaint, in situations where staying quiet may lead to harming the company.
- b. To prevent problems of breaching the Code of Ethics:
 - (i) Ensure identifying problems of breaching the Code of Ethics that may affect performance.
 - (ii) It is essential to ensure communicating policies and procedures related to solving problems of breaching the Code of Ethics.
 - (iii) To disclose problems of breaching the Code of Ethics through providing an efficient system that encourages employees to raise complaints without fear from any reaction.
 - (iv) To respond to problems of breaching the Code of Ethics by providing instant remedial response to solve problems and taking necessary disciplinary

actions.

3. Responsibilities of Employees

Complying with systems & regulations

Employees shall comply with systems and regulations applied at SKA, including those related to discipline, security, protection and policies and procedures of human resources applied in the Company. Employees are expected to fully perform their work, tasks and responsibilities in a manner that does not contradict with the interests of SKA.

Complying with the Code of Ethics:

Upon joining the Company, employees shall comply with the following:

- Read the Code of Ethics and make sure that they fully comprehend all points.
- Make sure that the Code of Ethics is applied on all subordinates.
- Comply with all policies related to the Code of Ethics.
- Not to hide any information related to breaching Code of Ethics by other employees.

Professionalism

Every employee shall perform his duties and tasks to the highest level of quality, honesty and competence.

Receiving Gifts and Tips

Any employee is not permitted to receive gifts, tips or services either given to him or to any member of his family or friends, which is granted as a result of employment with SKA, with the exception of moral gifts granted during work. Employees shall not receive bribes or any financial payments that may affect work decisions. Employees shall not receive any amount or financial compensation related to their job.

4. Employees behaviour

Employees are expected to fully perform their responsibilities and duties including supervisory tasks, professional treatment with others, working as part of the team and maintaining work quality and quantity.

Appearance

Employees are expected to attend at workplace in suitable clothing and SKA uniform appropriate to their role within the Company.

Attendance

Employees have to come to work on time and not to exceed times given to lunch and rest breaks. Employees are also expected to remain at their workplace to the end of the working day.

Safety

Employees shall perform their work in a safely manner that does not jeopardise other employees. Employees are also expected to maintain safety and health regulations and to immediately report accidents. Employees are to be conversant with the SKA Safety Management System and how it applies to their position within the Company.

Smoking

Smoking is prohibited inside all premises and facilities of SKA, except in designated areas. Smoking is prohibited within the boundary of all airports and airfields.

Behaviours with colleagues

Employees shall encourage their colleagues to comply with the requirements and policies of the Code of Ethics.

Employees shall attribute any achievement to the employee who made such an achievement and not to themselves.

Employees shall support their colleagues for professional progress.

Employees shall not unnecessarily interfere in the work of others.

Employees shall not discriminate between employees or annoy any employee, job applicant, customer or visitor.

Employees are not permitted to refuse working or cooperating with any other employee due to racial discrimination or any other reason.

5. Sexual Harassment Policy

SKA is responsible to provide a sexual harassment-free environment. This policy does not include common compliments accepted by the society, but includes undesired behaviour that may lead to personal injury for another employee and weakening morale, and accordingly, negatively affecting the performance efficiency of the employee and his colleagues. When an employee realises that sexual harassment behaviour has occurred, he shall raise a complaint to the Human Resources Department without fear from any reaction by any other person. The Company encourages reporting misbehaviour as a preliminary step for running an investigation and removing any kind of sexual harassment.

6. Nepotism

The basic criterion of selecting, employing and promoting any employee shall depend on qualifications and performance assessment. Family, marriage or partnership relation shall not grant any preference to or obstruction against employment, which shall depend only upon employment standards set by the Company. The purpose of this policy is not to discourage employing relatives, but to affirm that selection and assessment criteria are qualifications and efficiency.

7. SKA Properties

Employees are deemed responsible for the properties of SKA under their responsibilities such as keys, employees' identification cards and any other devices or equipment given to employees while performing their duties and responsibilities. Computers, faxes and photocopy machines are not restricted to personal usage. It is restricted to sell or exploit any goods or services owned by SKA for personal benefit unless agreed by the Company's management.

8. Conflict of Interests

Employees of SKA are responsible towards the Company, and they are committed not to take any action that may lead to contradiction between their personal interests and the Company's interests. Conflict of interest may arise in any of the following forms:

Any employee shall not to have any direct or indirect financial benefit from any supplier or client of the Company. Any employee shall not gain any discounts or personal benefits not granted to other employees. Any employee shall not be engaged in any outside work, either directly or indirectly, where he may compete or jeopardise the Company's interests and his responsibilities and duties. Any employee shall not be engaged in any part-time job during regular working hours of the Company. Any employee shall not practice any personal works or take advantage of SKA properties for personal purposes. Any employee shall not exploit his position in the Company to gain any privileges or personal advantages. Any employee shall not exploit his authority to gain any advantage, profit or personal benefit for himself or for any member of his family or for a friend.

9. Confidentiality

Maintaining Secrecy

The employee is responsible to maintain secrecy and integrity of all works, activities, business secrets, files and documents related to SKA and avoid illegal disclosure to any other parties. The employee shall not disclose any information related to security or any financial information that has not yet been made public. The said information shall not be disclosed to any other party. The employee shall keep confidential the Company's relationships and trading transactions with suppliers and brokers and any other parties.

Documents' Secrecy

The employee shall not make copies of business letters, documents, files or any other documents related to the business and activities of SKA. The employee shall submit all documents related to the Company's works upon his employment termination.

Client Privacy

The employee shall use any information related to clients that he maintains or has access to for work purposes only. The employee shall maintain documents related to clients and shall not disclose such information in a way that violates SKA's instructions.

10. Customer Satisfactory

Accuracy:

Quotations shall be clear and obvious so that the client can recognise the nature of the work to be done and obligations involved in it.

Response:

All clients' enquiries and all precautions shall be taken into account in order to guarantee maximum customer satisfaction. SKA shall set a proper and efficient technique to deal with customers' complaints.

Fairness:

All sales activities shall be characterised with fairness towards all clients and activities shall be specifically designed to avoid any kind of complaints.

Guarantees:

The contracting activities shall not include any warranties that provide the customer extra privileges not provided by SKA

11. Relationships with Suppliers

Ethics of dealing with Suppliers

Transactions with suppliers shall be characterised with honesty, fairness and legal integrity. Suppliers shall be selected according to efficiency and quality in supplying service, technology and reasonable price. Provisions and obligations shall be exchanged between SKA and suppliers and shall be agreed upon during the suppliers' selection process before starting the business. Such provisions shall include payment and secrecy policies adopted by the Company. Certain provisions in dealing with suppliers:

- Employees of SKA shall not take advantage of suppliers' errors.
- Employees of SKA shall not disclose secret information of the suppliers.
- Employees of SKA shall maintain secrecy of important information related to prices, technology or any other information, and they shall not disclose such information without a written approval.
- Employees of SKA shall solve all conflicts, disputes and claims based upon facts.

Requirements

SKA shall follow approved purchasing systems when buying services and goods for the Company. SKA shall undertake maximum precautions to guarantee that the supplier is supplying his goods according to highest quality and at ideal cost and delivery conditions.

SKA shall deal with the supplier who observes legal and local requirements and any other

standards related to labour, environment, health and security. SKA procurement employees shall avoid the following:

- Selecting a supplier not from the approved list of suppliers.
- Conflict of interests when selecting suppliers. This includes accepting gifts. Selecting a supplier and cooperating with him just because his company is owned by a relative or a friend
- The Supplier who does not provide sound or unfair work conditions.

13. Procedures of financial control

All accounting data entries shall be documented either by contracts or by invoices. It is prohibited to falsify financial data or input false and misleading data. Any funds shall not be maintained without registering it in the approved financial records. Employees of SKA shall pay attention to any forgery in financial documents or recording exaggerated fees, such as travel and accommodation fees or invoices, or any forgery in attendance record. Separate procedures shall be provided related to fees, obligations and personal financial compensations. The following actions will require stringent punishments:

- Purchasing materials unnecessary for operations of SKA.
- Expenses registered against purchases that have not been made.
- Exaggerated prices for materials that could have been obtained at lower prices from another supplier

12. Information Technology

Usage of information technology and the Internet

SKA makes the Internet available for its employees to enhance efficiency and effectiveness. However, although this tool aims at assisting employees to complete their duties, they may misuse it. The Company is allowed to monitor the Internet and e-mails and to examine existing files. Employees are permitted to use the Internet to communicate with clients, suppliers, colleagues, other companies, governmental authorities and any work-related authority for research and information exchange purposes for the interest of the Company, and not for personal interest during work hours. Computer services of the Company shall not be used in a way that violates systems and regulations applied in any country.

Upon using the Internet, the employee shall identify himself and his Company when sending e-mail messages, and shall not send spam messages. It is prohibited to distribute and store any kind of improper or offensive images on the premises of SKA. Such a behaviour is deemed a violation to the sexual harassment policy.

Internet Security

SKA is allowed to prevent any employee from visiting any website or any server.

Employees are not allowed to use the Internet for spreading any virus or software that may

breakdown the computer software or the network. They are also not allowed to stop any antivirus program that protects other users.

13. Environment, Health and Safety Policy

SKA is dedicated to secure and apply sound environmental, health and safety conditions. This obligation is applicable to all employees.

SKA is working hard to provide healthy work environment and to prevent work injuries or damages to the environment and society.

SKA is required to maintain safe operations that fulfil regulations of environment, health, safety and security applied in the country.

SKA has a commitment to high ethical standards. We expect our employees to show integrity in the workplace and when conducting business on SKA's behalf. We want all our employees to obey the law and also assist SKA in obeying the law.

SKA will always make an effort to understand what the law requires of us - by engaging and getting appropriate advice.

SKA will embark on educating employees on SKA compliance program on Code of Ethics. I urge all employees to pay close attention and to contact the Legal Department if you have questions. I am counting on your help in this very important effort.

Please join me, the senior management team, in giving your full support to our compliance program.

SKA is determine to run our operations to the highest ethical and professional standards. In practical terms every business transaction we undertake must be conducted in compliance with increasingly complex laws and regulations.

It is up to each employee to understand their responsibilities with regards to compliance with our Code of Ethics. Your support and commitment to meeting the highest standards of corporate governance, integrity and ethical conduct in all our business activities is very much valued.



Mike Douglas
President & CEO



Vanessa Douglas
Senior VP/Director HR&Admin