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**BK Gulf LLC**

# Code of Conduct

Integrity

Teamwork

Excellence

Respect

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# Foreword by Basheer Massad

“The business culture in the world and in the United Arab Emirates has changed and continues to change. Quite rightly, the scrutiny to which companies are subject is increasing and the standards expected of us are rising.

Dubai is reaching out to embrace the standards and ethics of the international markets, especially the United Kingdom and the United States of America. Dutco takes the lead in challenging, confronting and changing outdated thinking, as we recognize that these ethical standards are necessary to protect our reputation. Our key business asset is this reputation for quality, reliability, and fair dealing – indeed it is fundamental to our long-term success. Dutco’s reputation gives our clients, partners, suppliers and employees the confidence to trust us and do business with us.

A good reputation is hard won over many years, but is easily lost. One decision, by one person, can have a far-reaching impact across the Group. It takes only one decision to choose wrong over right and BK Gulf’s reputation will be damaged. We are all associated with and benefit from this good reputation. So let us challenge ourselves to strive for the highest of business standards of conduct.

This Code of conduct is a clear framework for ethical behavior that you are expected to follow. Do not fall into the trap of thinking that practices of years gone by are a measure of what is acceptable and provide justification for actions today. The Code of Conduct is the set of rules against which all of us at every level will all be judged.

Join with me to make sure that all of us, as individuals and as a team, always act fairly and do as we would want others to do to us. I urge you to challenge and report any questionable behavior and speak up when you see things that do not match our standards.”

**If in doubt, always ask.**

**I will always support you for doing the right thing.**



Basheer Massad, General Manager

# 1. Introduction

To sustain our business and allow it to develop and prosper requires that BK Gulf LLC (BKG) member of DUTCO acts responsibly not only by complying with applicable legal and regulatory requirements but also in terms of how we treat employees and business partners as well as how we care for the environment.

A set of business principles underpins our performance consistent with these beliefs. Guidelines to explain how these principles are translated into practice are promulgated in this Code of Conduct, which should be followed, by all employees and staff at BKG and subsidiary undertakings in addition to individual policies and procedures in all areas.

## 2. Purpose

The aim of these guidelines and underlying principles is to provide a framework for good business practices and strategies for preventing bribery, corruption and all other illegal acts, and infringements of human rights. The overall objectives of implementing the Code are to assist in meeting the targets of:

sustainability, good corporate governance and continual improvement in the effectiveness of our processes to reduce risk to the company's performance

eliminating bribery and corruption, including fraud and illegal anti-competitive practices

full compliance with all legal and regulatory requirements in each area of operation

achieving benefits in staff morale and positive feedback on our relationships with employees, business partners and the communities in which we operate

undertaking initiatives to promote greater environmental responsibility

Making a positive contribution to improving business standards of integrity, transparency and accountability wherever BKG operates.

## 3. Integrity and Ethics

### 3.1. Core Business Principle

***To instil a high standard of integrity, ethics and environmental responsibility in all aspects of our business dealings and operations***

We should all recognise and understand that corruption, extortion, dishonesty, bribery and environmental damage are not only unlawful but weaken the business and distort performance and are therefore unsustainable. To this end every one of us must operate all aspects of our business in an ethical manner with the highest integrity. This means treating our customers and their representatives, our subcontractors and suppliers and others with whom we work in a fair and honest way, dealing openly and reasonably with third parties and respecting the environment affected by our operations. We must also provide our shareholders with timely and accurate information relevant to their investment in BKG.

In all business transactions the company prohibits bribery, soliciting any advantage from any person and the offer or receipt of gifts, hospitality or expenses (except under specific circumstances given below).

### 3.2. Bribery and Soliciting, Accepting and Offering Advantages

***We must not offer, give or accept bribes or improper payments or advantages, or participate in any kind of corrupt activity, either directly or through any third party***

#### 3.2.1 No bribes

Under no circumstances may any employee offer bribes to any person or company for the purpose of obtaining or retaining business or an improper advantage in doing business. We must not permit others acting on our behalf to do so either.

#### 3.2.2 What we mean by 'advantage'

We interpret the term "advantage" to include any gift, loan, fee, reward, commission, office, employment, contract, service or favor. Every employee is prohibited from offering, giving, accepting or soliciting any advantage to or from clients, consultants, contractors, sub-contractors, suppliers or any person in connection with Company business. Offering, giving, soliciting or accepting an advantage in connection with your work is strictly forbidden and may be a criminal offence.

#### 3.2.3 When it is wrong to accept or offer an advantage

If the acceptance of an advantage offered could affect your objectivity or decision-making process or induce you to act against the Company's interests, you should decline to accept. Similarly, if acceptance could lead to questions or complaints of bias or impropriety, the offer must also be declined.

If by offering or giving an advantage, the person receiving the advantage might be considered to be under a sense of obligation to you, or might be induced to act against their employer's interests, then you should not offer or give the advantage.



Where an advantage is offered to you voluntarily, acceptance may be considered only if:

- a. it will not influence your performance; and
- b. you will not feel obliged to do something in return for the offer; and
- c. you are able to openly discuss the acceptance with management without reservation; and
- d. the nature and the value of the advantage are such that refusal could be seen as unsociable or impolite (see Section 3.4) and
- e. you enter the advantage in the Gift and Hospitality Register (see section 3.3).

Where you are considering offering an advantage to the owner or employee of any business connected with the Company's business, or a relative or other person associated with such a business, then you should only proceed (subject to internal authority procedures) if:

- a. it will not influence the performance of the recipient or the business they are associated with; and
- b. the recipient will not feel obliged to do something in return for the offer; and
- c. you are able to openly discuss the offer with management without reservation; and
- d. the nature and the value of the advantage and circumstances in which it is offered are within customary social and cultural norms of courtesy (see Section 3.4) and
- e. you enter the offer or giving of the advantage in the Gift and Hospitality Register (see section 3.3).

### **3.3. Gifts and Hospitality**

#### **3.3.1 When a gift or hospitality is wrong**

You are prohibited from offering, giving or accepting gifts or hospitality whenever such arrangements could improperly affect, or might be perceived to improperly affect, the outcome of procurement or other business transaction and are not reasonable and bona fide expenditures.

You should turn down invitations to meals or entertainment that are excessive in nature or frequency, so as to avoid embarrassment or loss of objectivity when conducting Company business. In other circumstances entertainment is often an acceptable form of business and social behavior and can have positive benefits. All entertainment expenses are subject to monitoring and internal approval.

#### **3.3.2 When a gift or hospitality may be accepted**

In certain circumstances and cultures the nature (e.g. advertising or promotional gift, customary gift given during festive occasions) and the value of the advantage may be such that refusal could be seen as unsociable or impolite. These gifts may be accepted but all gifts will be put into a central pool and distributed among all staff.

#### **3.3.4 Disclosing gifts and hospitality**

All gift and hospitality given or received whose value exceeds a certain minimum amount must be entered on a register.

### 3.4. Conduct outside work

Employees shall take care not to damage or bring discredit to the Company's interests or reputation through inappropriate behaviour outside the workplace.

### 3.5. Conflicts of Interest

Conflict of interest situations may arise when your personal interests compete or conflict with the interests of the Company. You should avoid such situations, actual or potential, which may compromise your integrity and put the Company's interests and reputation at stake.

Employees must declare to the Company and seek approval of any financial interest, direct or indirect, which any employee or members of his/her immediate family may have, in any business or other organisation which competes with the Company or with which the Company has business dealings. All such interests must be recorded on the Company's register of conflicts of interest.

Whilst there are no restrictions on normal bank loans, any employee or his/her immediate family should not grant or guarantee a loan to, or accept a loan from or through the assistance of any individual or organisation having business dealings with the Company.

### 3.6. Outside Employment and Investments

The UAE law and the terms of your sponsorship do not entitle employees to be employed by or perform services for other businesses in the UAE.

You shall refrain from engaging in any outside employment, directorships with other organisations, business investments or activities (whether in the UAE or elsewhere) that might conflict with Company interests. If you wish to engage in activities on behalf of another organisation, either on a regular or on a consulting basis, or invest in any company or establishment other than a publically listed company, then you must seek the prior written approval from the Company before proceeding.

### 3.7. Contributions and Sponsorships to Charities and other concerns

The Company ensures that charitable and community contributions and sponsorships are not used as a subterfuge for bribery. All charitable and community contributions and sponsorships shall be subject to Executive Committee approval (or in accordance with the Group Delegation and Limits of Authority) with clearly expressed objectives, shall be transparent to interested parties including all employees, shall be fully accounted for and made in accordance with applicable law.

### 3.8. Business relationships

You will adopt a high standard of integrity in business dealings with Customers, joint venture partners, agents, subcontractors, suppliers and other third parties with whom we have business relationships.

#### 3.8.1 Customers

The Company aims to offer quality services which present good value, are reliable and innovative and meet contract requirements. We seek to keep Customers truthfully informed about our capabilities and aspects of performance avoiding misrepresentation or exaggeration.

### **3.8.2 Joint ventures**

We shall undertake due diligence following established guidelines before entering into any joint venture and then on an on-going basis during the period of the relationship as circumstances warrant. The Company shall use all reasonable endeavours to ensure that the conduct of any joint venture partners and of the joint venture itself is consistent with this Code.

### **3.8.3 Consultants, agents, advisors and other intermediaries**

BKG undertake due diligence following established guidelines before appointing any consultant, agent, advisor or other intermediary, and on an on-going basis as situations warrant. Employees shall follow Company procedures when entering into contractual relationships and supervising the conduct of an agent, advisor or other intermediary and ensure all agreements receive prior approval of senior management according to the BKG Delegation and Limits of Authority. You must ensure that compensation paid is an appropriate and justifiable remuneration for legitimate services rendered and is paid through authorised channels.

The Company shall seek to reach agreement with the consultant, agent, advisor or other intermediary to comply with this Code and subsequently monitor their conduct retaining a contractual right of termination in case of conduct inconsistent with this Code. Provision shall be included in agreements relating to ethics and compliance policies, access to records, co-operation in investigations and similar matters.

### **3.8.4 Procurement of goods & services (subcontracts, purchase orders)**

The Company procures goods and services that represent good value and are obtained on fair and competitive terms using an open and transparent selection process and objective selection and performance evaluation criteria. Unless otherwise agreed, employees are to conduct this process using BKG's central procurement services to leverage the greater purchasing power and collective information obtained across the business in order to secure lower rates and charges and potentially less risky, better, safer and environmentally more sensitive services. You should follow the detailed procedures provided by the Company unless deviations have been authorized.

You must not give subcontractors or suppliers any information that will in any way influence the Company's selection of subcontractor or supplier in open tenders, except where expressly defined within a transparent selection or performance appraisal system.

### **3.8.5 Negotiated Contracts**

When circumstances do not allow you to follow the prescribed tender process or for other valid reasons a supplier is selected by a negotiated contract, a proper record of the selection process, the basis of selection and authorized approvals shall be maintained. In all cases you must ensure that the Company is receiving good value on fair and competitive terms.

Where the Company is offered a negotiated contract in circumstances in which you would expect the Company to be part of a tender process, a proper record of the individuals involved in the negotiation and the authorised approvals shall be maintained to ensure that no payments are made to or through intermediaries.

### **3.8.6 Due diligence**

Employees will undertake due diligence in evaluating subcontractors and suppliers not only to ensure they can deliver the required product or services but also to ensure that they are properly licensed for the activity for which they are engaged and will comply with all Labour Law regulations for payment of wages and have effective anti-bribery policies and procedures ensure legal compliance and to control any significant impacts they may have on the environment. The Company shall make known its own policies and this Code and seek to influence the conduct of business partners and shall impose contractual rights of termination in case of conduct inconsistent with this Code.

### **3.8.7 Supplier, subcontractor and other payments**

Compensation paid shall be appropriate and justifiable remuneration for legitimate services rendered and should be paid through authorized channels using accepted accounting policies. We shall discharge our contractual obligations in a fair, reasonable and timely manner without exception. In cases where variations to the work content arise requiring rapid mobilization, employees shall keep an open mind and cooperative attitude in dealing with legitimate appeals and balancing the interests of overall project performance.

## **3.9. Handling Company Property, Confidential Information and Intellectual Property Rights**

### **3.9.1 Use of Company Property**

Unless otherwise permitted under Employment policies, Company guidelines and procedures, the appropriation of Company property by employees for personal use or for resale is strictly prohibited. Similarly you are not permitted to use your authority over other employees to use Company resources for personal use. On termination of and at any other time during your employment when requested, you must hand over Company assets and records stored in whatever format or medium.

You should note that the company reserves the right to retrieve your e-mails and other electronic documents transmitted or stored using the Company's computers or computer systems and to monitor your use of the Internet.

### **3.9.2 Insider Trading**

Use of material information that has not been disclosed to the general public could affect investors' decisions to buy or sell shares in parent companies or business partners. You are not allowed at any time to directly or indirectly disclose any such information to third parties without prior consent, unless it has already been made public. Neither shall you use such information to further personal interest.

### **3.9.3 Confidential and Private Information**

The Company owes a duty to its Customers, shareholders, employees and business partners to protect any confidential, privileged and personal information entrusted upon us. In order to ensure continued confidence in our services, you are not allowed at any time to directly or indirectly disclose any such information to third parties without prior consent.

The Company strictly prohibits any access, usage or disclosure of employees' personal data without legitimate authorisation.

### **3.9.4 Intellectual Property Rights**

The Company will afford full respect to proprietary intellectual property and will refrain from using any ideas, products and goods without proper authorization.

### 3.10. Commitment in respect of the environment

Caring for the environment and sustainability issues increasingly permeate all Company work initiatives and practices as increasingly society expresses a clear demand for more environmentally sustainable practices. We believe that ethical behaviour extends to our responsibility in protecting the environment. We wish to make a positive contribution to sustainable development and are committed to greater self-regulation in this area. Every employee is encouraged to contribute by integrating sustainability issues as they relate to our industry into our business planning, strategies and decision-making.

We shall adopt a precautionary approach in our operations and conduct an environmental review for every new undertaking to identify the significance of impacts associated with the activities under our control. A risk management process will also be applied whereby actions will be taken to identify those potential threats of serious or irreversible environmental damage and to deal with them using best available technology taking into account what is technically feasible and economically viable within our influence and Customer requirements.

Progressively the Company will explore opportunities for the incorporation of environmentally benign material and process inputs and undertake whole life cycle cost assessment for selected products.

## 4. Compliance with all laws

### 4.1. Core Business Principle

***To abide by the legal and regulatory requirements in the countries where we operate***

We are committed to complying with the legal requirements applying in the countries where we do business. We have established policies and procedures to guide the proper management of operational compliance issues as well as systems dealing with financial, taxation and human resources management which enable employees to learn how to comply with all accountability standards, laws, rules and regulations. We shall maintain and continually improve these systems of management and shall ensure that all employees have the information available or are given instruction to know these standards, laws and regulations applicable to them. At the same time you must make yourself aware of these requirements as they apply to you.

### 4.2. Business licenses

The Company establishes, holds and maintains valid business registrations and operating licenses to carry out business activities in each country and where applicable for each type of operation as required by local authorities and laws.

The Company shall only carry out its operations within the scope and conditions of these licenses and registrations and in compliance with any local trade restrictions and export controls. Employees shall provide detailed and accurate information when requested by the Company for the application or maintenance of licenses or registrations.

The Company has established legal experts who you must consult in all cases where you may have doubts or difficulties in understanding, interpretation or application of trading conditions, registration or licenses.

### 4.3. Company Records, Invoices and Accounts

Employees shall accurately enter data into the records and reports established and submitted. Falsifying documents, or furnishing false accounting records, receipts or invoices are considered offences under the laws of most jurisdictions and are strictly prohibited.

The Company shall ensure full compliance with all local tax laws (where applicable) making full reporting of all income and expenditure, completing and submitting timely tax returns and making timely payments of all tax liabilities, making proper declarations for customs import and export duty purposes.

#### 4.4. Employment of illegal workers or working illegally

The Company will ensure that all employees engaged have the necessary visas, work permits, specific registrations, licenses and qualifications needed before they perform the duties assigned to them.

The Company implements access controls to our sites and offices to prevent illegal immigrants or others who cannot be lawfully employed from entering or working on our sites or within offices under our control.

The Company will only work with subcontractors who are the legal sponsors of the workers that they deploy to our sites. We monitor the presence of illegal workers on sites by conducting random checks on all workers, including subcontract workers.

#### 4.5. Insurances

BKG shall arrange all required insurances through local insurance companies in accordance with local legislation including where applicable Employees' Compensation Insurance for all employees; third party vehicle insurance, and construction all risks insurance.

BKG shall ensure that all subcontractors and suppliers, whose workers who enter on its sites, hold Employees' Compensation Insurance in compliance with local laws.

#### 4.6. Safety, Environmental and other laws

We treat compliance with health, safety and environmental protection regulatory requirements applicable to our business as a minimum standard expected to be adhered to by all employees. Management shall ensure that all applicable legal requirements are identified and actions put in place to ensure compliance. You are required to obey the law and follow all applicable regulations.

## 5. The rights of employees and communities

### 5.1. Core Business Principle

#### *To observe the rights of our employees and the communities in which we work*

We offer employment conditions that meet the minimum legislative requirements and accepted conventions and do not employ involuntary labour. We do not allow harassment and, subject to compliance with local legal requirements, provide recruitment and career progression based on objective criteria, individual performance and merit.

We observe the rights of employees and subcontractors to a safe and healthy work place. We continually seek to prevent and minimise the adverse impacts of our activities on the environment and the communities in which we operate, and we will engage with communities to share concerns and identify risks as early as possible.

### 5.2. Equal opportunities

We are committed to providing a workplace environment where tolerance is practiced and diversity of colour, race, ethnic affiliation, religion, nationality, gender, age, marital or family status is accepted. In certain cases however the requirements of safety regulations relating to specific positions within a construction business; immigration laws and visa quotas and Emiratizations and other national policies will take precedence.

We do not employ any person below the legal minimum age and will require commitments from suppliers and subcontractors to refrain from such practices. We comply with the maternity leave laws within each country.

Recruitment, job transfer and progression, remuneration and training and award of discretionary bonuses when applicable are determined solely by the application of objective criteria, fair and unprejudiced opinion, personal performance and merit. We have established guidelines for recruitment, training, and standard terms and conditions for application within each country.

### 5.3. Harassment

Harassment is regarded as any unwelcome conduct, which would be likely to offend, humiliate or intimidate any person or to give rise to an intimidating, hostile or offensive work environment. Employees, including managers shall take positive steps to prevent harassment by setting a good example. Reports of harassment will be treated in the strictest confidence and every effort made to ensure that the victim is protected and not disadvantaged in terms of his employment or working environment. If you raise a complaint of harassment by a third party, the matter shall be investigated and acted upon to ensure you do not continue to experience such behaviour.



## 5.4. Grievances

The Company recognizes the sensitive nature of complaints of unfair treatment or harassment and will ensure that employees who wish to discuss such issues may do so in a consistent and structured format with total confidentiality. Employees will not be penalized for raising grievances.

In the event of a grievance being raised to a manager relating to discriminatory behavior or harassment, the manager must notify the General Manager immediately, irrespective of how trivial the complaint may appear. All complaints will be treated in the strictest confidence.

## 5.5. Exploitation

The Company aims to allocate sufficient resources to manage the business effectively and to meet daily demands. The organizational structure, normal duties and expected working hours for employees are defined. All local official public holidays for the private sector are observed or compensation or time in lieu provided in accordance with the local laws. We also apply local conventions regarding the calculation of the number of days of holidays.

Managers with authority may vary duties from time to time within reasonable limits. Working hours may also be adjusted, subject to compliance with Company guidelines, to suit project working schedules and to meet deadlines and such working hours are monitored and controlled to ensure employees are treated fairly and efforts are recognized. Excessive or prolonged periods of overtime work are not encouraged. Should employees consider their workload to be excessive or their position is being exploited they are encouraged to discuss the matter with their manager or follow the grievances procedure (Section 5.4).

We comply with all laws governing minimum wages, where applicable.

## 5.6. Safe, healthy and secure working environment and conditions

Our vision is to have a workplace without injury or accident. You have a clear duty to yourself, your fellow workers and in many cases the public to take every reasonable precaution to set up and maintain a safe and secure working environment free from hazards. The Company has set up management systems and resources to plan, implement, control and continually improve performance in these areas. Strict wearing of safety equipment when on site and adherence to the policies, manuals, procedures and safe working rules are expected of all employees at all times.

The Company will not tolerate any unsafe work practices or serious infringements or staff being under the influence of alcohol or drugs during working hours. Should such behaviour be detected you will be subject to different levels of disciplinary action including possible dismissal.

## 5.7. Working in the community

As a minimum the Company seeks to engage with the local communities in which we work to find out their concerns related to our operations and where practicable to take actions to alleviate such concerns in a responsible manner. When approached by the media about Company affairs you are to follow the guidelines established and unless otherwise authorised you should direct such enquiries to the General Manager. As a Company we will also use our position and influence within the community to promote health and safety, sustainability and environmental protection.

As a rule you are to treat members of the public with respect, courtesy and due consideration at all times.

## 6. Implementation of this Code

### 6.1 Core Business Principle

***To create the means to effectively make the Code of Conduct an integral part of daily practice***

We will endeavor to ensure all employees are familiar with this Code and are informed of all matters material to its effective development and implementation through appropriate monitoring activities and communication with relevant interested parties.

### 6.2 Organisation and responsibilities

The senior management is responsible for overseeing the development and implementation of this Code of Conduct and management should provide leadership, resources and active support for implementation and shall demonstrate visible and active commitment to the implementation of the core business principles.

### 6.3 Training

Employees shall receive specific training on the Code tailored to relevant needs and circumstances. Where appropriate, subcontractors and suppliers shall also receive instruction or briefings on the Code. Training activities shall be assessed periodically for effectiveness.

### 6.4 Raising concerns and seeking guidance

We encourage employees and others to raise genuine concerns about failure to follow this Code verbally or in writing to responsible managers as early as possible to enable the Company to take appropriate action in an ethical manner. The Company provides secure and accessible channels through which employees and others can raise concerns and report potential malpractice in confidence and without risk of reprisal.

Employees can in the first instance raise issues with their responsible line manager or the manager responsible for their business unit or department. However, if employees believe that they cannot raise their concerns to the responsible manager or, having raised the issue, believe it is not being dealt with appropriately, then employees may approach the Compliance Officer or General Manager, on a confidential basis, who will deal with the matter promptly and fairly.

To further encourage employees to raise concerns and report potential malpractice, the Company has implemented an ethics helpline service, which will provide a confidential channel by telephone or email. Details of the ethics helpline will be published in the Company's Ethics Helpline Procedure.

Employees may, if they consider it necessary, report matters anonymously via the ethics helpline which will be monitored by representatives of the shareholders and the Compliance Officer, although it is preferred that employees identify themselves to facilitate investigation and resolution of matters raised or reported.

Examples of the types of matters that employees are encouraged to report are matters:

posing a danger to the health and safety of an employee or any other individual; or

causing actual damage to the environment; or

constituting harassment of an employee; or

involving the commission or likely commission of a criminal offence, such as misappropriation of Company property or other dishonest acts; or

involving acts of corruption (such as bribery or fraud) by or against the Company;

involving undisclosed conflict of interest or self-enrichment;

involving failure to comply with a legal obligation (under any decree, regulation, rules or contract); or

interfering with proper judicial process (such as, for example, giving false or misleading evidence to a court expert in proceedings involving the Company); or

involving financial irregularity or misreporting; or

involving a material breach of the Code of Conduct; or

involving a deliberate "cover-up" of any of the above.

It is the Company's policy to protect and support anyone who reports genuine (non-malicious and non-vexatious) matters of concern, but employees should be aware that the identity of the person reporting the matter will need to be disclosed to the relevant authorities should legal or criminal proceedings result from the report or may in any event be revealed by the information provided in the report.

Anyone reporting matters of concern who is treated detrimentally is encouraged to report this to Compliance Officer and /or the General Manager or if necessary the Executive Committee of the shareholders.

Matters brought to the Company's attention will be investigated thoroughly and sympathetically and be brought to the attention of management at its regular meetings. Where appropriate and practical, feedback may be given to the employee who reported the matter. These ethics helpline channels are not for raising grievances, which should be handled in accordance with the procedures for handling grievances referred to in Section 5.4.

## 6.5 Internal controls

The ***Company*** shall maintain accurate books and records, which properly and fairly document all financial transactions, selection processes, formal agreements and other records required under this Code and reference guidelines and procedures. We shall not maintain off-the-books accounts.

The Company shall maintain an effective system of internal controls, comprising regulatory, financial and organizational checks and balances over our accounting and record keeping practices and other business processes related to implementation of this Code.

We encourage feedback from employees on the procedures to support continuous improvement and shall subject the internal control systems, including the accounting and record keeping practices, to regular audits to verify compliance.

## **6.6 Disciplinary action**

The Company shall apply appropriate sanctions for violations of this Code of Conduct, up to and including termination of employment or engagement under certain circumstances. Breaching the Code may also in some circumstances lead to prosecution.

## **6.7 Legal rights and obligations**

The Code does not affect the rights or obligations of any employee at law including his/her rights or obligation in respect of the reporting of a criminal matter and the disclosure of such matter to an external party as may be required by law.

A breach of the Code may lead to prosecution and conviction under UAE federal law and equivalent legislation in other jurisdictions.