

# ***Supplier Code of Conduct Policy Statement***

## **Introduction**

The Supplier Code of Conduct Policy Statement (the Policy) sets forth the principles and standards of ethical conduct, sustainable, and socially responsible business practices that Ittihad International Investment LLC (III) and its subsidiaries (henceforth referred to as 'III' or 'the Group') expect of its suppliers and partners.

The Policy applies to third parties including vendors/suppliers, service providers, and partners (as well as their employees, agents, affiliates, and subcontractors, etc.) that work with III and its subsidiaries. The Policy is in addition to, and not in lieu of, existing third-party agreements and any legal or other obligations independent of such agreements.

## **Policy Commitments**

III aims to build relationships with suppliers and other third parties that share the Group's commitment to the highest standards of ethical, sustainable, and socially responsible business practices. III expects third parties working with the Group to uphold the following principles, which are consistent with those set forth in the Group's Code of Ethics and Business Conduct Policy Statement.

Furthermore, III encourages third parties within the scope of this Policy to define their own Supplier Code of Conduct that adopt similar standards.

### *Business Integrity and Ethical Conduct*

Third parties should take adequate measures to detect, prevent, and report to relevant authorities any form of bribery, corruption, fraud, money laundering and terrorist financing, conflict of interest, extortion, anti-trust and anti-competitive dealing, or any other breach of ethical business conduct, in accordance with applicable laws and regulations.

Furthermore, they should make adequate provisions to encourage whistleblowers to report violations of the above or any breach of ethical business conduct, in confidence and free from fear of retaliation, as long as reports are made in good faith.

### *Human Rights and Ethical Employment Practices*

III encourages third parties to uphold internationally proclaimed human rights, as defined by International Labour Organization (ILO) conventions, including the prohibition of child labour or forced labor acquired through modern slavery or human trafficking.

Third parties should adopt fair compensation and working conditions, in accordance with applicable laws and regulations.

Third parties should commit to being a fair and inclusive employer that treats employees with respect, dignity, and honesty, free from fear of discrimination or harassment.

They should commit to being an equal opportunity employer that hires and promotes based on merit and provides all employees with opportunities to advance their careers.

They should embrace diversity in the workplace and ensure that all employees are afforded the same opportunities, regardless of age, gender, race, religion, citizenship, physical ability, marital status, family situation, country of origin or other factors.

#### *Privacy and Data Protection*

Third parties should take adequate measures to safeguard all proprietary and confidential information, including data belonging to the third-party company, its employees, customers, or other stakeholders, in accordance with applicable rules and regulations and global best practices. Confidential information obtained through a relationship with III should be afforded similar protection and must not be misappropriated or used for personal advantage or for the benefit of third parties.

#### *Environmental, Health and Safety (EHS)*

Third parties should enforce Environmental, Health and Safety (EHS) standards, in line with global best practices and in accordance with all applicable laws and regulations. Third parties may refer to III's dedicated EHS Policy for further details.

#### *Conflict of Interest*

III encourages external parties to avoid conflict of interest in its business dealings and with III, in accordance with applicable laws and regulations in the locations where they operate.

### **Stakeholder Engagement**

III engages with stakeholders to better understand their ethical conduct concerns and endeavours to integrate these considerations into this Policy and its underlying procedures, as appropriate.

### **Training and Awareness**

III encourages third parties covered by this Policy to provide appropriate training and awareness for their employees to enable them to uphold the provisions of this Policy and to understand how violations could negatively impact the III's operations and its stakeholders, as well the operations of the third party.

### **Compliance**

III encourages third parties to read, understand, and comply with this Policy and reserves the right to request third parties to certify compliance with the Policy. Third parties that are unable to comply should inform III promptly. III may re-evaluate its relationship with third parties that fail to comply with this Policy which could result in eventual termination of the business relationship.

Third parties should comply with applicable laws and regulations of the host country of their operations. Third parties registered and operating in countries other than the United Arab Emirates (UAE) should comply with both the laws of the host country in addition to the applicable laws of the UAE, throughout the duration of the contractual agreement and/or business relationship with III.

### **Roles and Responsibilities**

All directors, executives, employees, outsourced employees, or seconded employees working for or on behalf of III should ensure that third parties are aware of this Policy. III encourages authorized representatives of third parties to ensure that their organizations uphold the principles set forth in this Policy.

### **Reporting and Transparency**

In accordance with the Group's Whistleblower Policy Statement, III encourages stakeholders to report any violations or suspected violations of this Policy using the appropriate channels. Any employee or individual covered by this Policy that identifies a violation, or a suspected violation, of this Policy is dutybound to report the matter. The report can be submitted to either the official Whistleblower Service through the following email: [whistleblower.iii@ittihadinvestment.ae](mailto:whistleblower.iii@ittihadinvestment.ae) or to the III Compliance Officer through the following email: [iii.compliance@ittihadinvestment.ae](mailto:iii.compliance@ittihadinvestment.ae). Reports can be submitted in confidence, anonymously, and free from fear of retaliation, in accordance with the Whistleblower Policy.

### **Policy Review**

The Group will review this Policy annually, or sooner if required, and revise this to ensure it remains up-to-date and aligned with the company's Mission, Vision, core values, laws, and regulations of the UAE and/or host country of its operations, and with global best practices. The Group shall make available on the appropriate channels any changes to this Policy, and every version will have an updated effective date.

The Board of Directors has reviewed and approved this Supplier Code of Conduct Policy Statement.