

Supplier Code of Conduct

Version December 2024

**DUBAI**
HOLDING

For the Good of Tomorrow

Contents

MESSAGE FROM OUR GCEO	3
WHO WE ARE	4
OUR COMPANIES	5
WHAT IS THE SUPPLIER CODE OF CONDUCT?	6
WHO DOES THIS CODE APPLY TO?	7
HOW IS THIS CODE IMPLEMENTED?	8
PROCUREMENT AND TENDERING	9
EMPLOYMENT PRACTICES	10
Human rights	
Modern slavery and anti-trafficking	
Child labour	
Fair labour	
Discrimination and equal treatment	
HEALTH, SAFETY AND SECURITY	11
Policies and procedures	
Healthy working conditions	
Safety training	
Product safety	
Security	

NATURAL ENVIRONMENT	12
Compliance with environmental laws	
Environment protection	
TRUST AND INTEGRITY	13
Anti-bribery and anti-corruption	
Gifts and entertainment	
Anti-money laundering	
Fair competition	
Confidentiality	
Conflicts of interest	
Tax compliance	
Data privacy and cybersecurity	
Right to audit	
Compliance	
ANNEX 1: THE TEN PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT	15

Message from our GCEO

Dear valued business partner,

At Dubai Holding, and across our companies (**Dubai Holding**), we are dedicated to creating a sustainable future for our stakeholders, the wider community and generations to come. We are committed to acting with honesty, integrity and in compliance with laws and regulations to deliver our purpose, For The Good of Tomorrow. We conduct business responsibly and ethically and expect the same from our suppliers in order to protect our reputation for integrity and to maintain our competitive advantage.

As part of this commitment, we have developed the Supplier Code of Conduct that outlines our expectations of those who wish to do business with Dubai Holding. As such, we require our suppliers to treat their employees and sub-contractors with respect and dignity, to comply with all applicable laws and to provide a safe and healthy work environment. We also expect our suppliers to respect the environment and minimise their environmental footprint.

As a valued supplier of Dubai Holding, I count on you to continuously adopt sustainable business practices, and I look forward to our partnership as we build a strong, ethical and compliant supply chain.

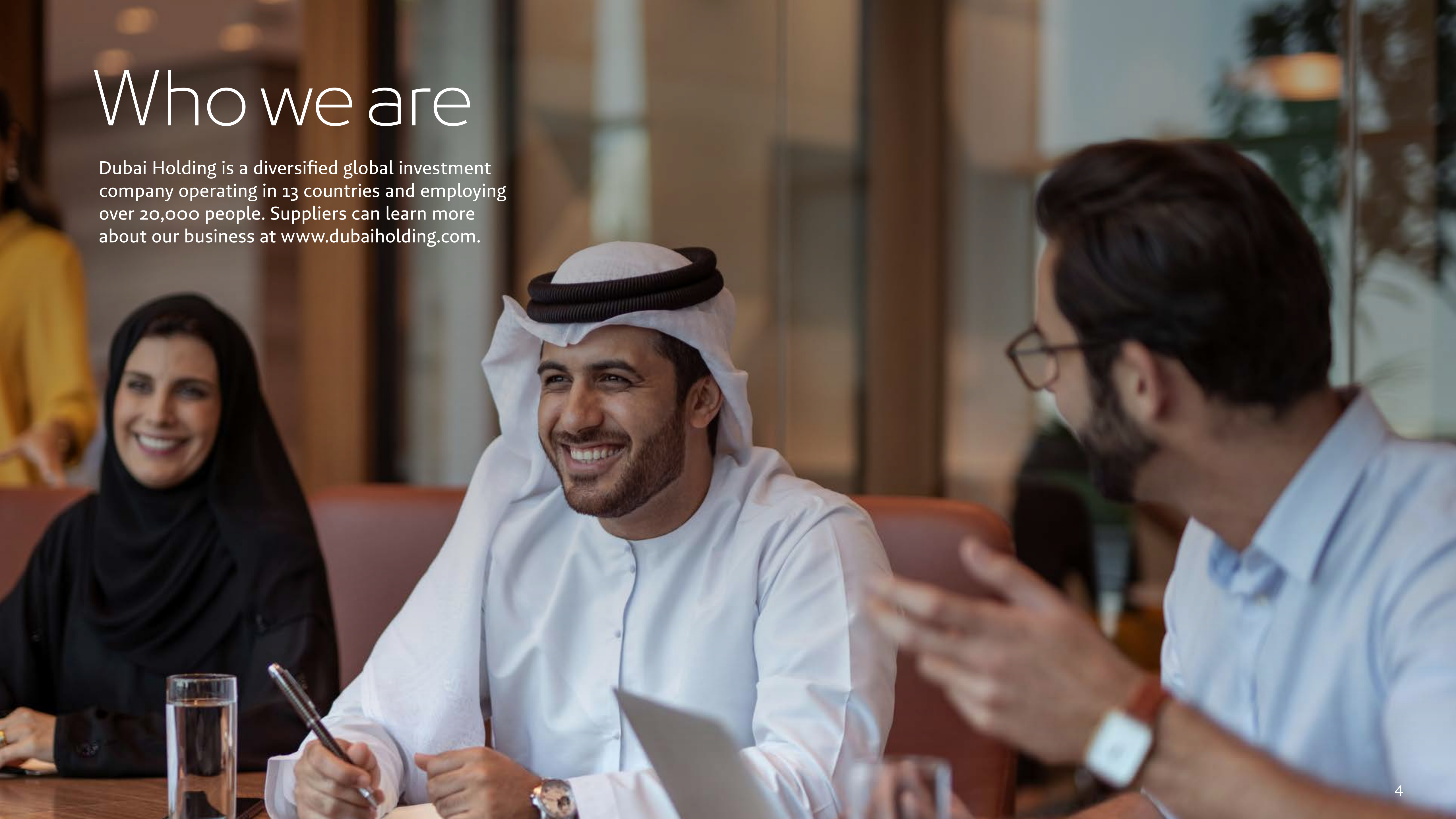
Amit Kaushal

Group Chief Executive Officer
Dubai Holding



Who we are

Dubai Holding is a diversified global investment company operating in 13 countries and employing over 20,000 people. Suppliers can learn more about our business at www.dubaiholding.com.



Our companies

The logo for Dubai Holding, featuring the word "DUBAI" in a bold, black, sans-serif font above the word "HOLDING" in a smaller, black, sans-serif font. A red checkmark is positioned above the letter "A" in "DUBAI".

The logo for Dubai Holding Asset Management, featuring the word "DUBAI" in a bold, black, sans-serif font above the word "HOLDING" in a smaller, black, sans-serif font, with "ASSET MANAGEMENT" in a smaller, black, sans-serif font below. A red checkmark is positioned above the letter "A" in "DUBAI".

The logo for Dubai Holding Real Estate, featuring the word "DUBAI" in a bold, black, sans-serif font above the word "HOLDING" in a smaller, black, sans-serif font, with "REAL ESTATE" in a smaller, black, sans-serif font below. A red checkmark is positioned above the letter "A" in "DUBAI".

The logo for Dubai Holding Hospitality, featuring the word "DUBAI" in a bold, black, sans-serif font above the word "HOLDING" in a smaller, black, sans-serif font, with "HOSPITALITY" in a smaller, black, sans-serif font below. A red checkmark is positioned above the letter "A" in "DUBAI".

The logo for Dubai Holding Entertainment, featuring the word "DUBAI" in a bold, black, sans-serif font above the word "HOLDING" in a smaller, black, sans-serif font, with "ENTERTAINMENT" in a smaller, black, sans-serif font below. A red checkmark is positioned above the letter "A" in "DUBAI".

The logo for Dubai Holding Investments, featuring the word "DUBAI" in a bold, black, sans-serif font above the word "HOLDING" in a smaller, black, sans-serif font, with "INVESTMENTS" in a smaller, black, sans-serif font below. A red checkmark is positioned above the letter "A" in "DUBAI".

The logo for Dubai Holding Land Estates, featuring the word "DUBAI" in a bold, black, sans-serif font above the word "HOLDING" in a smaller, black, sans-serif font, with "LAND ESTATES" in a smaller, black, sans-serif font below. A red checkmark is positioned above the letter "A" in "DUBAI".

The logo for Dubai Holding Community Management, featuring the word "DUBAI" in a bold, black, sans-serif font above the word "HOLDING" in a smaller, black, sans-serif font, with "COMMUNITY MANAGEMENT" in a smaller, black, sans-serif font below. A red checkmark is positioned above the letter "A" in "DUBAI".

The logo for Group Services, featuring the word "Group Services" in a black, sans-serif font. A red checkmark is positioned above the letter "G" in "Group".



What is the Supplier Code of Conduct?

This Supplier Code of Conduct (**Code**) outlines our expectations from our suppliers. Beyond meeting the minimum requirements of adhering to applicable laws in their countries of operation, this Code highlights the importance of meeting the highest ethical standards in terms of performance and acting with integrity.

Who does this Code apply to?

This Code applies to all third parties that supply goods or services to Dubai Holding and any of its companies or entities. It covers the minimum requirements that all suppliers and their sub-contractors are expected to adhere to in order to do business with Dubai Holding. Where a supplier engages a sub-contractor to undertake business for Dubai Holding, that supplier is responsible for ensuring their sub-contractor's compliance with the Code.



How is this Code implemented?

This Code will be communicated to new and existing suppliers who will be requested to acknowledge the Code as part of doing business with Dubai Holding. We may systematically review the compliance of our business partners against the Code as part of our supplier management process. We may require our high-risk suppliers to conduct an assessment of their sustainability performance. This is an important step in improving sustainability performance, whilst recognising that our business partners are at different stages of maturity in their sustainability journey. We are committed to working together with our partners to ensure they understand the terms of the Code and comply accordingly to drive continuous improvement.

We may update the Code from time to time, and suppliers should refer to our website to ensure they are aware of the terms prescribed under the Code at all times.

We maintain a secure and independent communication channel to report any concerns or business practices which breach the spirit and requirements of this Code. We encourage suppliers to share their concerns through these channels:

Online: www.trustline.ae (anonymous reporting option is available)

Email: trustline@dubaiholding.com

Phone: +971 (0)4 362 2000
Ask to speak with Dubai Holding's Head of Internal Audit or the Head of Security.

In person: Dubai Holding Head Office, Umm Suqeim Road, Dubai, United Arab Emirates. Ask to speak with the Head of Internal Audit or the Head of Security.

Procurement & tendering

Dubai Holding has implemented policies which ensure that the procurement process and selection of suppliers is conducted in a manner which is fair, transparent and auditable. Wherever possible, we seek to prioritise local suppliers as well as small and medium enterprises.

During the tendering process, suppliers are required to communicate through the channels provided by Dubai Holding's Procurement Team to maintain the integrity of the process. Suppliers are also required to comply with Dubai Holding's procurement process. Failure to do so may lead to disqualification from participating in a tender or being blacklisted from Dubai Holding's supplier register.

Employment practices

We require our suppliers to adhere to all local labour laws in relation to their employees. We also expect our suppliers to comply with international labour and human rights standards as defined in the Ten Principles of the United Nations Global Compact, which is included in Annex 1.

Our minimum requirements are the following:



Human rights

Our suppliers should adhere to international standards of human rights. Any non-compliance with human rights standards is considered in direct breach of this Code and may result in termination of our business relationship.

Modern slavery and anti-trafficking

We condemn all practices of involuntary labour and modern slavery across our value chain and supplier community. No one should be forced to work under threat of penalty, forced overtime, human trafficking, debt bondage or any other form of modern slavery. We expect that our suppliers take all necessary precautions to prevent human trafficking and forced labour in their business operations, including in sub-contracted activities.

Child labour

Use of child labour by suppliers, in any element of their supply chain, will not be tolerated. All workers across our supply chain must be at least the minimum age as required by applicable legislation and only work the permitted number of hours relating to their age. Workers under the age of 18 should only be engaged in activities that do not interfere with and/or impact their compulsory education.

Fair labour

Suppliers are expected to engage in fair labour practices and comply with all applicable labour and employment laws, including ensuring employees are paid in accordance with their contractual terms, receive timely and fair payment and do not suffer any unlawful deductions. Suppliers should provide just and equitable working conditions, where employees are not subject to exploitation.

Discrimination and equal treatment

We promote diversity and do not tolerate any act of discrimination including, but not limited to, nationality, religion, disability, gender or other legally protected status. We expect the prevention of discrimination to be a priority in every workplace, and we encourage our suppliers to implement policies and training that support a respectful, diverse and inclusive work environment.

Health, safety & security

We are committed to providing a healthy, safe and secure working environment for employees across our business, and we expect the same standards from our suppliers and sub-contractors.

Policies and procedures

In addition to adherence to all applicable laws and regulations, our suppliers are expected to systematically manage all health and safety risks and demonstrate continuous improvement. Suppliers are expected to have health and safety policies in place and support procedures commensurate with risk levels.

Healthy working conditions

Our suppliers are required to provide a safe and healthy workplace for their employees and sub-contractors, including the provision of personal protection equipment (PPE) appropriate to the nature of the work. These requirements extend to workers' areas of accommodation, if accommodation is provided by the supplier. The living conditions of workers are expected to at least meet the minimum legal requirements.

Safety training

Training workers on health and safety systems is critical to prevent any incident and empowers workers to report unsafe practices without fear of reprisal. Our suppliers are encouraged to maintain training records in order to provide them upon request, so as to satisfy compliance requirements.

Product safety

Suppliers must ensure that all products offered in their business dealings with us are safe and in accordance with the applicable laws of use and supply. Suppliers are expected to provide safety information as well as adequate training on the handling of their products.

Security

Dubai Holding does not tolerate threats, intimidation or acts of violence towards its employees by suppliers. Engagement in such activities will result in potential criminal prosecution as well as immediate blacklisting from Dubai Holding's supplier register.





Natural environment

As a responsible corporate citizen, Dubai Holding strives to minimise the impact of our business operations on the environment and to manage our environment-related impacts.

Compliance with environmental laws

Our suppliers are required to comply with all applicable laws and regulations related to environmental management and protection, as well as with all relevant international standards where applicable.

Environment protection

We encourage our suppliers to systematically manage their environmental impact related, but not limited to, biodiversity, air emissions, waste generation and water discharge.

Trust & integrity

Dubai Holding suppliers are required to comply with applicable anti-bribery and anti-corruption laws, rules and regulations and uphold the highest standards of ethical behaviour when conducting their business.

Anti-bribery and anti-corruption

Dubai Holding has zero tolerance for bribery and corruption. Bribery includes offering, giving, receiving or soliciting anything of value, such as cash or cash equivalent, business hospitality or contributions. Our suppliers must not participate in any form of bribery, extortion or fraud. We do not tolerate illicit enrichment and facilitation payments. Suppliers and those acting on their behalf are prohibited from offering facilitation payments to any Dubai Holding employee to expedite their routine duty or processes. Any such conduct will result in immediate blacklisting from Dubai Holding's supplier register.

Suppliers are requested to have structures, policies and controls in place to monitor, manage and prevent bribery and corruption in their operations and those of their sub-contractors.

Gifts and entertainment

Gifts and entertainment include anything of value given by a supplier to a Dubai Holding employee, such as meals, products, discounts and tickets to entertainment or sporting events. Giving or receiving gifts may be intended to influence Dubai Holding's business decisions. Only token low-value gifts of less than

AED 500 or foreign currency equivalent (subject to local legal requirements), can be accepted by Dubai Holding employees.

Anti-money laundering

Money laundering is the process by which criminals attempt to disguise or conceal the proceeds of crime to make it appear to have come from a legitimate source. Money laundering is illegal and can result in significant criminal and civil penalties such as imprisonment and fines. Dubai Holding actively monitors its businesses for suspicious transactions and activities. Any suspicions of money laundering in our supply chain should be reported via the established reporting channels.

Fair competition

We are committed to fair competition, and we respect competition laws that promote and maintain the benefits of free market, healthy competition and prevention of anti-competitive conduct. As such, our suppliers are expected to conduct their business fairly and competitively. Adherence to applicable anti-trust and competition laws is a minimum requirement to doing business with us.





Confidentiality

When competing for or conducting business with us, our suppliers must not discuss nor disclose any confidential information belonging to Dubai Holding, including but not limited to intellectual property, non-public information in respect of our customers, employees or our businesses. After our business relationship ends, suppliers are required to continue protecting our confidential information. Suppliers are not allowed to use the Dubai Holding logo or name publicly without prior written consent, nor are they allowed to make any representations or statement on behalf of Dubai Holding

Conflicts of interest

Suppliers must avoid any situation or relationship that may involve an actual or perceived conflict of interest with Dubai Holding. Suppliers and future suppliers of Dubai Holding should disclose in writing any situation that may create an actual or perceived conflict of interest to Dubai Holding prior to signing any contractual agreement or as soon as the potential conflict is identified.

A conflict of interest may encompass various situations, including but not limited to, the following instances:

- Holding a significant ownership stake or possessing substantial financial interests in any entity that stands to gain from the supplier's business association with Dubai Holding.
- Providing Dubai Holding employees with consultancy services, directorship positions, freelance commercial opportunities or other financial or professional prospects.
- Employing individuals who have close ties or connections to government officials with the ability to influence matters that could reasonably impact Dubai Holding's business operations.
- Engaging the services of a company owner or representative who previously worked for Dubai Holding.
- Having a company owner or representative who shares an immediate familial relationship with any Dubai Holding employee.

Tax compliance

We hold our suppliers to high standards of tax compliance, expecting adherence to both the explicit requirements and the underlying principles of applicable tax laws in all operational jurisdictions. It is imperative that suppliers refrain from violating or enabling the violation of applicable tax laws, including any activities that could aid in the evasion of owed and payable taxes or concealment of information from tax authorities.

Data privacy and cybersecurity

Personal data is any type of information that can identify an individual such as name, date of birth, email address, telephone number or IP address. We comply with applicable personal data protection laws and local regulations, and we expect our suppliers to do the same. In addition, suppliers are expected to implement necessary measures to protect data in their possession against cyberattacks, while reporting any suspected breach in accordance with requirements and best practice.

Right to audit

We may reserve the right to audit our suppliers' compliance to this Code, in accordance with the applicable contract. Suppliers are encouraged to maintain proper records of their receipts, reports and any other relevant documentation to support audits or assessments for a minimum of 7 years or the statutory requirement, whichever is higher.

Compliance

We expect our supplier community to adhere to the applicable laws of their country and the laws of the countries where they do business. Beyond adhering to the applicable law, our suppliers are encouraged to act with integrity and highest ethical standards.



Annex I:

The Ten Principles of the United Nations Global Compact

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

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