



CODE OF ETHICAL PURCHASING AND SUPPLY



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OUR MISSION

We commit to build profitable relationships with our business partners by investing in our community, employees, and customers in order to make them happy.

OUR VISION

Delivering value
Embracing heritage
Growing together

OUR VALUES

Empowered
Optimistic
Engaged
Excellent
One team

OUR GOALS

Exceed customer's expectations
Becoming an employer of choice
Motivated team of professionals
Enhance shareholder profits

Message from AL Masaood Group Management

Over the last decade or more, Al Masaood has developed to become a highly diversified and dynamic organisation that now enjoys an enviable reputation for quality and reliability.

From its early foundations as a small trading house some 50 years ago, Al Masaood has become one of the largest integrated industrial, commercial and service organisations in the Middle East.

The relationship we have with our suppliers and partners has played a major role in the company growth and become vital to our success.

At Al Masaood we believe that relationships however must be built on a groundwork of integrity and ethics. We believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business.

This document outlines our values of doing business ethically, responsibly and within the law.

We expect you as a partner to share and embrace these values while doing business with Al Masaood or on our behalf. With your help we can continue to grow the Al Masaood brand and to contribute to Abu Dhabi and UAE Economy.

**This Code applies to all suppliers, sub suppliers
and partners of**

Al Masaood Group LLC

and forms part of our contractual agreement.

**We take any breaches of the Code very seriously and as a
result**

**may decide to re-evaluate our business relationship
with you including termination of contractual agreements and
further businesses.**

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1. Complying with Laws

Complying with all applicable laws, regulations and policies is fundamental to how we undertake our work within the Al Masaood Group. This is a critical element of ensuring that all our business is conducted properly.

Acting in violation of any applicable law is unacceptable to the Al Masaood Group, and can risk exposing you and/or your company to legal action. Where there is a difference between a legal requirement and the Code, we seek to apply the higher ethical standard, if we are always complying with the law.

2. Working with our Suppliers

The Al Masaood Group has policies and procedures in place to support the integrity of our sourcing process. Tenders for goods and services are undertaken on a clear and transparent basis. Our suppliers are selected fairly and on merit. We expect our suppliers to align themselves with the principles set out in this Code. The Al Masaood Group has a no tolerance policy to suppliers who fail to act with the level of integrity the Al Masaood Group expects of its own employees. Employees should not accept or solicit any benefit from an existing or potential supplier that might compromise or appear to compromise an objective assessment of the suppliers' products or services

3. Preventing Bribery and Corruption

Bribery is the act of giving something of value in exchange for an alteration of behavior. Fraud is the act of deception to make unlawful gain by falsifying, misrepresenting or distorting information. Corruption is dishonest or fraudulent conduct.

We have a zero-tolerance approach to bribery, corruption and fraud in line with the laws of the UAE and other applicable laws. You must never offer, solicit, give or accept any form of improper payment such as bribes or kickbacks. A bribe or a kickback doesn't have to be cash, it can be

anything of value that is offered in exchange for business favours, information, favourable treatment or similar. As a supplier to Al Masaood Group, you are expected to report any suspicious activity regarding inappropriate payments immediately. Each person who is responsible for the selection and oversight of third parties who act on our behalf is responsible for ensuring that there are processes in place to ensure they have not and do not engage in this kind of conduct.

4. Avoiding Money Laundering

Money laundering is the process by which the source of improperly obtained money is concealed to appear legitimate. The Al Masaood Group is committed to ensuring that its operations do not inadvertently facilitate the process of money laundering. This means we need to know and understand the identity of the people and organisations we do business with. We need to do our due diligence where appropriate, and only do business with customers, suppliers and partners that are reputable and responsible. Any irregular payments or unusual activity should be reported.

5. Complying with Trade Laws

Working and transmitting goods, services, funds and information across international borders can be subject to international trade laws. The UAE, like most countries, has laws regulating import, export and customs procedures and restrictions on dealings with certain countries, entities and individuals. It is fundamental that our suppliers ensure their compliance with applicable international and domestic trade laws. Suppliers responsible for the conduct of Al Masaood Group business governed by internal trade regulations, or that have touch points across international borders, are under a duty to ensure they and their team understand and comply with all applicable laws, regulations and restrictions.

6. Following Applicable Competition Laws

Many countries have laws concerning antitrust and unfair competition that are strict, complex and have international reach with severe penalties for companies and individuals where there is breach. When working internationally or with competitors, you should ensure you understand any competition laws that apply to your business operations.

7. Conflicts of interest

A conflict of interest may arise wherever an individual's personal, social, financial or other activities or relationships interfere with that individual's objectivity or loyalty to its service of the Al Masood Group.

As one of our suppliers, you must disclose any conflicts of interest and discuss them with Al Masood management for its further review and consideration.

8. Gifts and entertainment

A business courtesy is anything of value that is provided to or received from a third party, or between fellow employees (whether from the same or from different Group Companies), in the context of a business – as opposed to personal interaction. It might be a gift, an offer of hospitality, or something else. Business courtesies can be used to build goodwill, may form part of strengthening existing relationships, or can be an important part of cultural business etiquette. However, any business courtesy that is offered or received inappropriately, particularly with inappropriate intentions, is unethical and in breach of the Code

The Al Masood Group general principles of business courtesies are:

- The giving or receiving of cash or any monetary instrument or remuneration of any kind is never acceptable;

- Any business courtesy that is offered or received must be reasonable, and consistent with ethical, cultural and professional practices, whilst also following applicable policies and local and federal laws;
- Any business courtesy given or received above the value of AED500 must be declared using the Gift Declaration Form;
- Suppliers may not offer any form of business courtesy if it may be intended to influence procurement decisions;
- Suppliers must not seek to influence the decisions of others by using business courtesies;

There are certain common-sense exceptions that apply to these general principles. These include offering of corporate discounts to the organisation (rather than the individual); the giving of awards and honorary degrees in appropriate circumstances; widely attended gatherings and public events; and meals or entertainment at a reasonable cost and frequency where they do not contravene the principles of the Code and applicable policies/procedures. When in doubt, you should contact the Al Masaood Procurement Manager.

9. Health, Safety & the Environment

The Al Masaood Group is committed to protecting the health and safety of its people and protecting the environment. There are specific policies, procedures and codes of practice in place throughout the Al Masaood Group that are designed to help us all achieve these aims. Everyone within the Al Masaood Group including its customers and suppliers should be conscious in their daily activities of their personal responsibility to themselves and to others. They should give due consideration to the prevention of accidents, harm to health, environmental damage or adverse impacts on the community. It is the policy of the Al Masaood Group to promote a smoke-free environment.

10. Keeping business and financial records

It is essential for Al Masaood Group LLC to keep business records in order. Records related to Al Masaood business kept by your company must be correct in all important respects. Do not hide, fail to record information, or make false entries. All financial records must conform to accepted accounting ethics. Whether handwritten, printed or electronic, documents and records are fundamental to our business. Care should be taken from the time of their creation until final destruction. You are responsible for making sure that effective records are kept in appropriate, searchable, useable structures and that their destruction is managed in accordance with applicable internal and external restrictions on the destruction of data. Never falsify documents or records or create documents or records that are deliberately misleading.

11. Labour/Human rights

You are expected to comply with all relevant employment laws and regulations including statutes that prohibit discrimination, human trafficking, slavery and forced labour in the workplace. Al Masaood Group LLC also expects you to comply with all laws and regulations related with fair treatment, minimum wage and other applicable compliance requirements imposed by the applicable laws and regulations.

12. Privacy

Information obtained from or relating to any part of the Al Masaood Group (including persons within the Al Masaood Group) should be considered confidential if it is not officially available in the public domain. You may only treat information obtained from or relating to the Al Masaood Group as non-confidential if you have appropriate approval or authority to do so. As Al Masaood supplier you should take proper measures to safeguard confidential information and data you may be entrusted with. You must also comply with all relevant data privacy laws and only use

personal data for the purpose intended. You must also take care to ensure that Al Masaood's intellectual property rights are protected.

13. Contacts and reporting

Al Masaood Group LLC is committed to doing business ethically, responsibly and within the law. As one of our partners your responsibility begins with understanding and complying with this Code.

If you have observed any breaches of this Code or concerned about any ethical or legal compliance issues, you should bring them forward to Al Masaood's Management

You can reach the Al Masaood Group Procurement Manager or Group Compliance Team at 02-677-2000 Alternatively, you can send an email to riskandcompliance@masaood.com or Sofiya_poland@masaood.com clearly stating the matter and that you are a supplier of Al Masaood Group LLC.

For all confidential concern, breach of supplier code of conduct or unethical behaviors please submit the details via Whistleblower Application by accessing <https://wb.masaood.abudhabi/>

You will be asked to review and sign this Code periodically to ensure compliance at all the times

14. Acknowledgment

Received and accepted by:

Name of supplier:

Date and supplier company seal: