



**TECOM GROUP  
CODE OF CONDUCT**

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TECOM GROUP



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# INTRODUCTION BY CEO

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At TECOM Group, we are committed to providing vibrant world-class business districts where our customers and communities thrive. For more than 20 years, we have built and reinforced our reputation upon the foundations of integrity, reliability and transparency. These are values that we must always strive to protect.

Our commitment to ethical business principles, underpinned by the integrity of all our people, is essential to ensuring that TECOM Group remains a leader in its field. We each have a responsibility to our customers, partners, shareholders and one another to meet the guidelines and expectations set out in this Code of Conduct.

We must never lose sight of the values and culture that have shaped us to the company we are today. Our individual efforts have contributed to a successful whole. As such we are each brand ambassadors and it is imperative that our personal behaviours consistently reflect our values.

I ask for your commitment as we continue our journey to always “do the right thing – even when no one is watching”. That includes speaking up if you see anything that you believe is inappropriate, unethical or unlawful. I urge you to familiarize yourself with the contents of this document and reflect upon the values of our Company.

**Abdulla Belhoul**  
**CEO TECOM Group**







## WHO WE ARE AND WHAT WE STAND FOR

### We have clear vision

to be a world-renowned provider of innovative business ecosystems. Our path to get there is equally clear, we will achieve this by providing customer-centric solutions that address our customers' current and future needs. The value creation for all our stakeholders is based on differentiation and innovation, which will lead to sustainable growth and excellence.

### What we do and who we are doing it for

when existing and potential customers, as well as competitors and the broader commercial real-estate sector think of TECOM Group, they will think of us as the benchmark for providing best-in-class business environments; that we create the best foundations and environments enabling customers to succeed and grow. We believe that our customer's success is our success, and together we make Dubai thrive for generations to come.

### What we believe in

The way we approach everything that we do, and all people that we interact with is based on our core values: Committed to Excellence, Innovative, Authentic and Collaborative. These are not values that change from time to time, situation to situation or person to person, but rather they are the core pillars, the foundation of our culture.





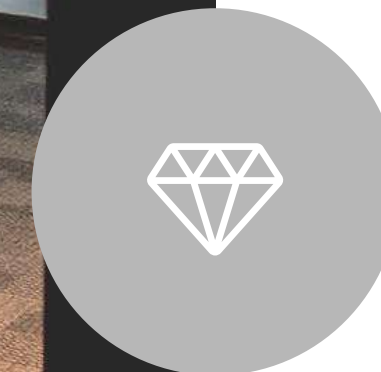
## OUR VISION

World-renowned curator of innovative ecosystems.



## OUR MISSION

Realize Dubai's aspirations by creating sector-focused communities and thriving work environments that enable the success of business and talent in Dubai.



## OUR VALUES

Authentic  
Collaborative  
Innovative  
Committed to Excellence





# OUR VALUES



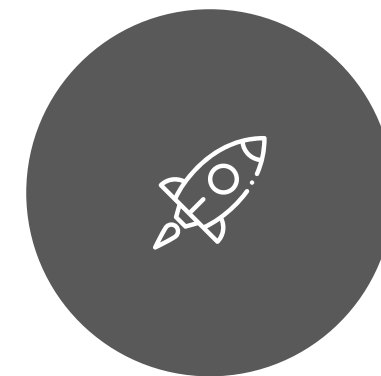
## Authentic

We build trust by being authentic, sincere and honest in all situations, which is the basis for any relationship. It also means that we are true to ourselves and each other, creating a culture of empowerment. Being authentic is also reflected in how we approach and resolve problems and make decisions.



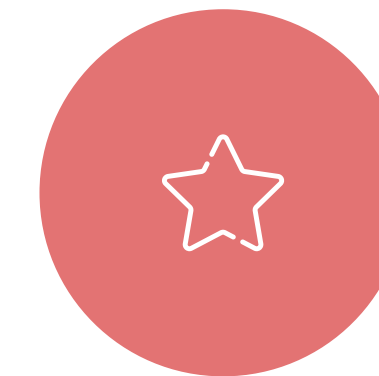
## Collaborative

We exceed the expectations of our customers and stakeholders by working together and creating long-lasting value and growth. We foster an environment where everyone's contribution is valued, and that the diversity of our people represents the strength of Company.



## Innovative

We turn challenges into opportunities through collaboration, empowerment and inclusivity. We approach challenges as an opportunity to innovate, excel and add value to our customers and stakeholders.



## Committed to Excellence

We differentiate ourselves from the competition by providing exceptional services and solutions to our customers. We take pride in what we do and how we do it, regardless for whom we are doing it. All employees, customers, partners and stakeholders are equally important to us.

# SUMMARY OF CODE OF CONDUCT

Our Code of Conduct reflects our commitment to the highest ethical standards and is essential to TECOM Group. Our Code applies to everyone working with or on behalf of Company, including employees, temporary staff, agents, Senior Leadership and the Board of Directors. Our Code of Conduct is based on the following principles:



## **We Foster a Culture of Compliance and Integrity**

To comply with applicable laws and regulations is the foundation for all our business activities, but we hold ourselves to higher standards.

We uphold the highest ethical standards every day at work. If you are unsure of what choice to make, ask yourself not only if it follows our policies or the law, but also whether it would affect the trust customers and other stakeholders place in TECOM Group if it were disclosed in the news.

Speak up when something is wrong or when someone does not act in accordance with our Code of Conduct. If you wish to report an allegation, you may do so through confidential reporting channels such as Trust Line, which can be accessed via TECOM Group's website and intranet portal or designated email, which allows you to raise a concern anonymously.

In addition to the above, you may also confide with the Head of Internal Audit and/or Head of Security. Rest assured that TECOM Group will not tolerate retaliation against anyone who raises a concern in good faith or participates in an investigation.

If you are a manager, you have additional responsibilities to serve as a role model, to act as a brand ambassador, and escalate concerns — and never tolerate retaliation.



## **We Avoid Conflicts of Interest**

A situation when your personal interests may conflict with or may appear to conflict with the interests of TECOM Group, its customers or stakeholders, or your ability to make an objective decision are commonly identified as a conflict of interest and must be avoided.



## **We Protect Our Assets**

Protect, secure and use our assets appropriately for business purposes. This includes physical assets, electronic assets, information systems and intellectual property and confidential business information.



## **We Respect Each Other**

Respecting each other includes customers and any other people we interact with in our capacity as TECOM Group employees. We are proud of the diversity in the Company and believe it is part of our success. We do not tolerate any kind of discrimination, harassment, retaliation or intimidation of any kind.



## **We Comply with the Law**

TECOM Group is committed to complying with applicable laws and regulations in every decision we make and in every action we take. Consequently, we are not doing business with sanctioned governments, jurisdictions, individuals and entities. We have zero tolerance for bribery and corruption.



## **We Live the Code**

Any violation to our Code of Conduct is acted upon and may result in disciplinary actions up to and including discharge.

# OUR EXPECTATIONS

We are all held accountable for our actions and honor our commitment to act ethically and in compliance with the applicable laws and regulations. We must always strive to demonstrate ethics in every situation:

**01.**

We inspire others and create a work culture that inspires employees to act with integrity and speak up about concerns.

**02.**

We are always honest in our business dealings internally and externally.

**03.**

We are committed to complying with the Code of Conduct, company policies and all laws and regulations.

**04.**

We seek guidance from managers or other company resources when needed.

**05.**

We report suspected violations of the Code of Conduct, TECOM Group policies or the law.

**06.**

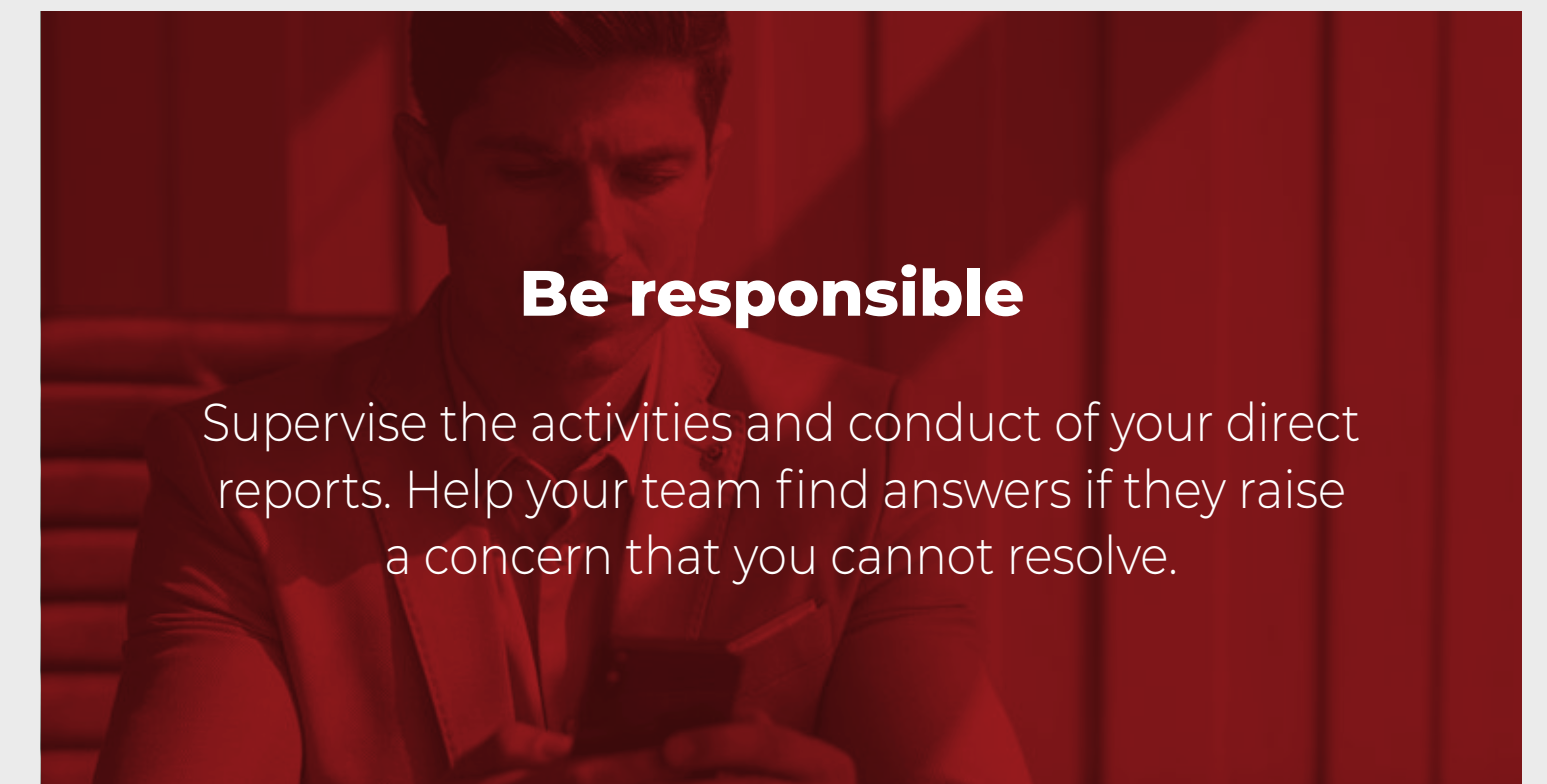
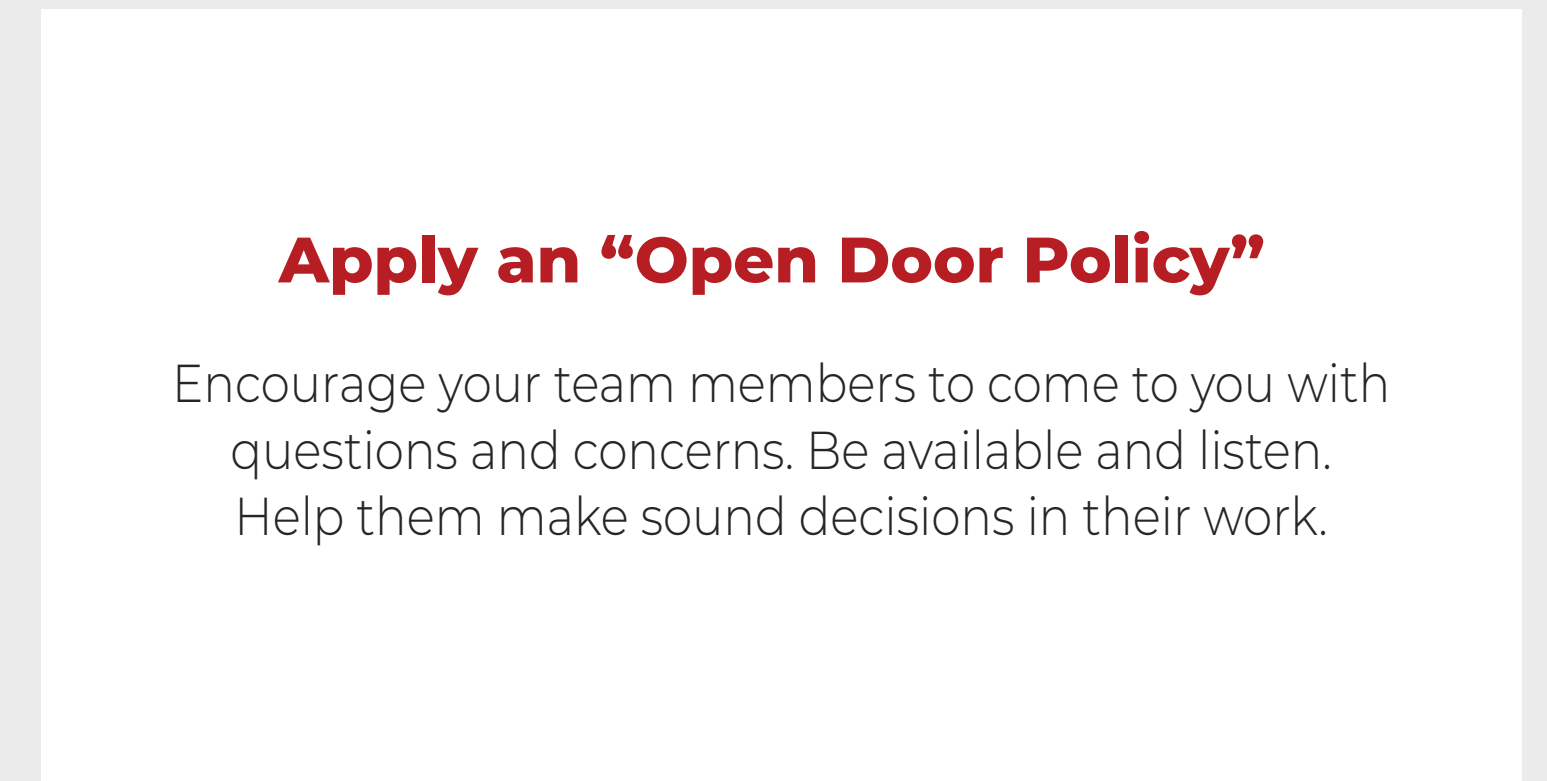
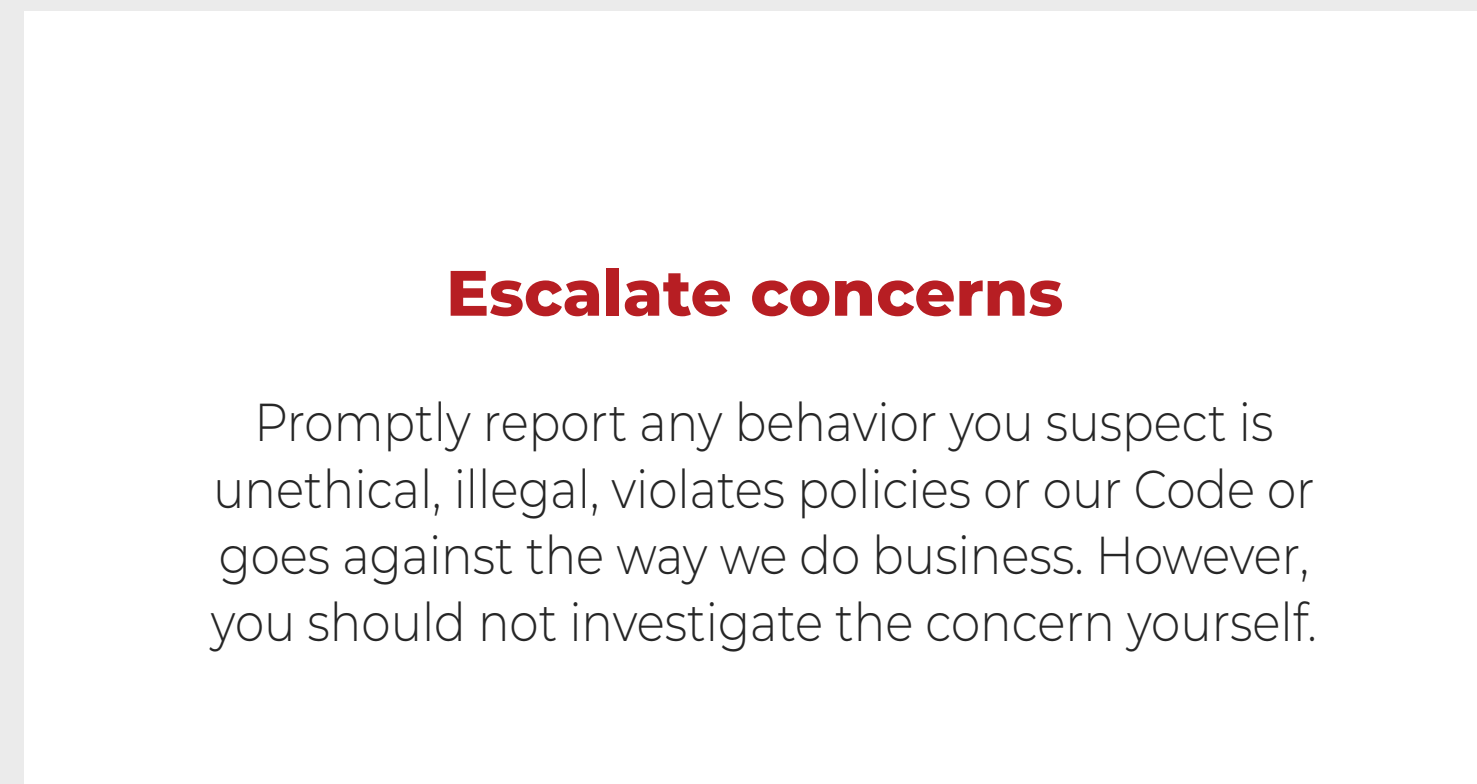
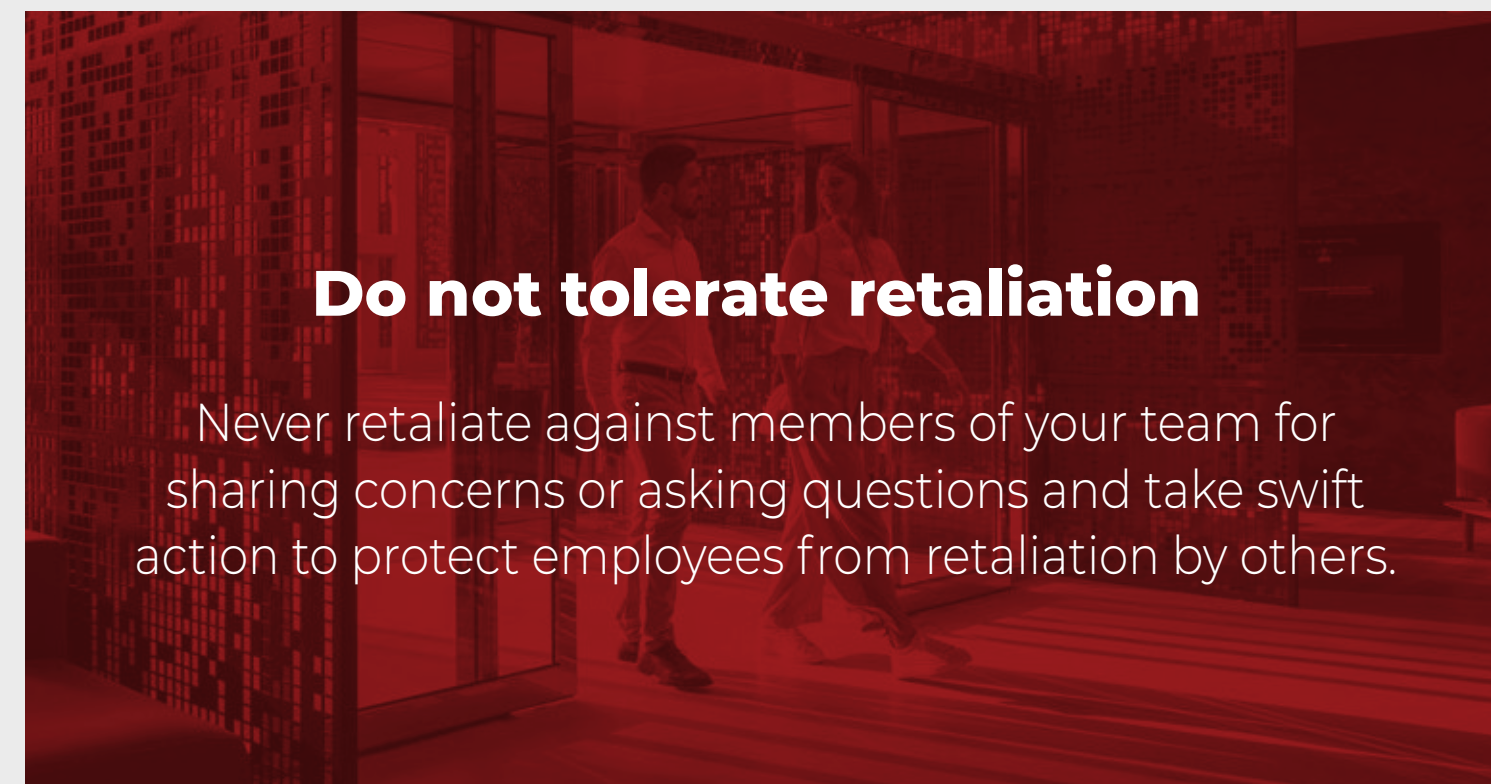
We encourage open communication, including a “Speak Up” culture to raise concerns without the fear of retaliation.



## MANAGER – SPECIFIC RESPONSIBILITIES

Even those in leadership roles sometimes need help. If you are not sure of the proper course of action, seek guidance. Managers and employees in leadership positions have additional responsibilities and serve as role models and TECOM Group brand ambassadors.

Managers are expected to:





# WE APPLY SOUND JUDGMENT

Our Code of Conduct reflects who we are and what we stand for as a company, and our commitment to compliance with laws and regulations and the highest ethical standards. Every action and decision we make at all levels defines who we are, how we are being perceived and our reputation as a company.

Our Code applies to everyone working with or on behalf of TECOM Group including:

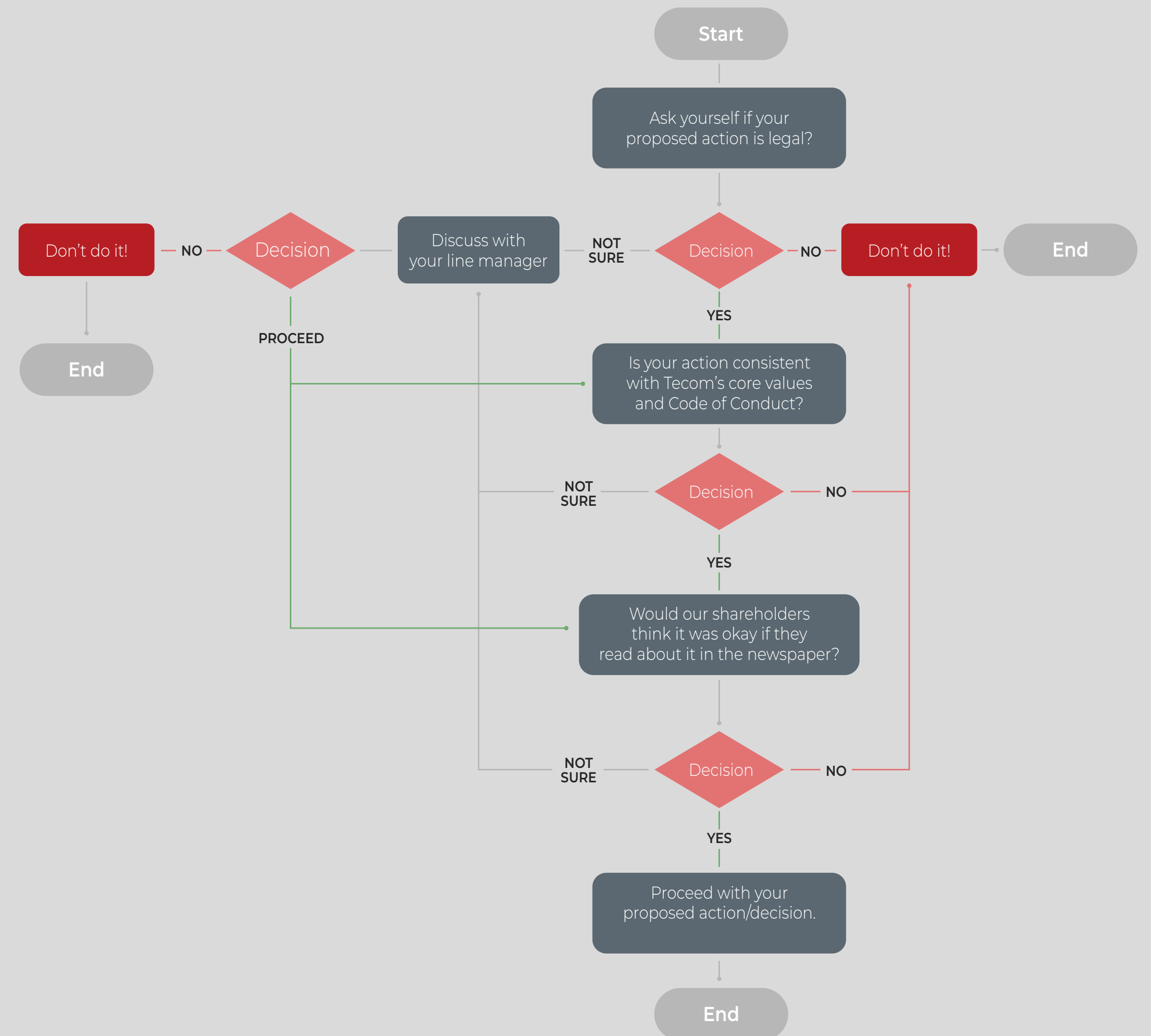
- Employees
- Temporary Staff
- Contractors
- Third Parties
- Management
- Board of Directors

## REMEMBER



- Refer to the Code to make the right decisions.
- Use sound judgment to uphold the highest ethical standards and protect the brand.
- Seek help and guidance if you have questions.

If you are faced with a compliance concern or an ethical dilemma, the Code provides you with easy-to-understand information that will help guide your decisions. If you are unsure how to act or what decision to make, you can as a first step apply the **“Headline Test”**:





## REMEMBER



You should not investigate any suspected violation or breach yourself – always report it in accordance with this Code of Conduct.

Other anonymous ways  
to report concerns:

[trustline@tecomgroup.ae](mailto:trustline@tecomgroup.ae)  
[tecomgroup.ae/trustline.html](https://tecomgroup.ae/trustline.html)

For further Information refer  
to the intranet portal:

**TECOM Whistleblower Policy.**

# WE ACT WITH INTEGRITY

If you are asked to do something that makes you feel uncomfortable, or you witness or suspect activity that goes against our Code, the law or our values, let our internal independent functions know.

**In person report to** – Head of Internal Audit.  
Head of Security.

### Co-operate:

Be sure to cooperate in any misconduct investigation. Failure to cooperate or interfering with an investigation may result in disciplinary action, up to and including termination.

### No Retaliation:

We do not tolerate retaliation against anyone who participates in an investigation or raises a concern in good faith. Retaliation may result in disciplinary action, up to and including termination

Our goal is to ensure a safe and respectful environment where everyone can “speak up.” When we learn of a potential violation of the Code of Conduct or other TECOM Group policy by Staff or contracted third parties, a confidential, professional investigation is conducted. We address misconduct through a formal resolution process and confirmed violations of our Code and other company policy may result in corrective action, up to and including termination of employment.



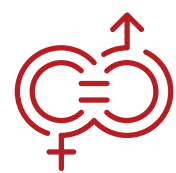
# WE DO NOT TOLERATE HARASSMENT OR DISCRIMINATION



Promoting a culture of compliance requires all of us to demonstrate ethical behaviour, sound judgment and trust. This shared commitment is integral to protecting our company and its stakeholders. We prohibit discrimination, harassment or intimidation that is unlawful or otherwise violates our policies, whether committed by or against a manager, co-worker, client, supplier, or visitor.



We value the individual differences, experiences, and capabilities of each employee. Our collective strength is based on Inclusion — enhanced by the diverse backgrounds and perspectives of our teams — makes TECOM Group a better place to work and a better business partner for our customers and business partners. We are strongly committed to equal opportunity in all employment decisions and promote a culture where everyone is treated with dignity and respect. Maintaining an inclusive environment also involves removing barriers experienced by employees with disabilities by providing reasonable accommodations when needed.



TECOM Group prohibits any form of harassment or discrimination, including but not limited to race, color, sex, religion, beliefs, age, marital status, national origin, ancestry, medical condition, citizenship, physical or mental disability and any other characteristic unrelated to the ability to fulfil the role and assigned responsibilities.

## REMEMBER



We take appropriate measures to protect employees, clients, suppliers or visitors from being threatened, abused or assaulted at work and promptly investigate allegations of harassment or discrimination and take appropriate disciplinary action to the fullest extent permitted by local law.

[trustline@tecomgroup.ae](mailto:trustline@tecomgroup.ae)  
[tecomgroup.ae/trustline.html](https://tecomgroup.ae/trustline.html)

For further Information refer  
to the intranet portal:

**TECOM Whistleblower Policy**  
**TECOM Human Capital Policy**



## REMEMBER



We have identified and notified all people considered as “insiders” and required those to sign a formal declaration acknowledging possession of Unpublished Price Sensitive Information (UPSII).

If you are uncertain whether you are an “insider” or believe you should be added to the list of “insiders,” contact the TECOM Investors Relations Officer.

[www.moj.gov.ae/en/laws-and-legislation.aspx](http://www.moj.gov.ae/en/laws-and-legislation.aspx)

For further Information refer to the intranet portal:

**TECOM Delegation Of Authority Policy**  
**TECOM Signing Authority Matrix Policy**  
**TECOM Corporate Compliance Manual**  
**TECOM Anti Bribery and Anti Corruption Policy**  
**TECOM AML CFT and Sanctions Manual**

# WE COMPLY WITH LAWS AND REGULATIONS

We are committed to complying with applicable laws in every decision we make and in every action we take. It is part of our shared commitment to compliance and integrity.

- All our employees must comply with applicable laws and regulations, as well as our internal policies, including the Code of Conduct.
- We do not expect all our employees to be legal experts, but we do expect that you are familiar with the laws and regulations associated with your role and the duties you perform. You may access Local Laws and regulations through the Ministry of Justice’s official portal.
- If you see or otherwise encounter an actual or suspected breach do not hesitate to report the matter as per this Code of Conduct through appropriate in-person or anonymous reporting channels.

## We Do Not Engage in Insider Trading

Not only is insider trading unethical, but it is also illegal.

While working at TECOM Group, you may have access to material, non-public information (also referred to as (“Unpublished Price Sensitive Information, UPSII”) about the Company or you may learn of material, non-public information about other companies such as our customers or business partners.

Information is considered “material” if there is a substantial likelihood that a reasonable investor would consider it important in deciding to trade in the shares of the company. This type of information is often referred to as “inside information,” and people who have access to this type of information are often referred to as “insiders.”

You shall not use, share or otherwise divulge any sensitive information which may be used to make investment decisions.

## Examples of potential material, non-public information include:

- Mergers or acquisitions
- Expected or actual financial performance
- Significant changes in executive management
- New products or services
- Cybersecurity breaches



# WE DO NOT TOLERATE BRIBERY AND CORRUPTION



We are committed to winning business through fair and honest competition in the marketplace. Never offer, promise or pay anything of value to someone with the intention of improperly influencing an action or business decision to secure a business advantage. TECOM Group is subject to local anti-corruption laws and have adopted international best practices. The consequences for giving or accepting a bribe can be severe for the Company and for you as an individual. Be particularly careful when interacting with public officials, including employees of state-owned companies.

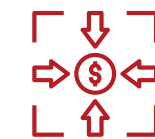


Remember, third parties cannot be used to make offers or payments that TECOM Group cannot lawfully make itself. You must never offer something of value to a third party if you suspect it may be passed along to a public official or a key decision maker in a pending business deal to improperly influence their decision making. We will take necessary actions to confirm third parties working on our behalf are not making unlawful payments without our knowledge. To protect yourself and the Company, follow our procurement procedures that vet and authorize the use of third parties. If you suspect a third party is misusing funds from TECOM Group (or its own funds) to make illicit payments, report the matter as per this Code of Conduct through the appropriate in-person or anonymous reporting channels.

We believe that the right way to do business is the only way to do business. We have zero tolerance for bribery and corruption because we are committed to fair and honest competition.



A small gift can strengthen a relationship but if excessive or too frequent it crosses the line. Knowing and following guidance for gifting and entertainment protects our brand and our reputation.



Gifts and entertainment should only be offered or received if they are within the authorized limits set out in TECOM Groups's policies. If the value exceeds AED 500 (or local currency equivalent) they must be declared and approved in writing by your manager and final written approval given by the Human Capital Department.



Accepting and providing business hospitality, such as meals or refreshments, is permitted when it is in the context of a business meeting. Token low value (under the AED 500 limit) gifts like branded pens, notebooks, other branded items can be accepted.

## REMEMBER



Giving or receiving cash or cash equivalent items like cheques, money transfers, and pre-paid gift cards are always prohibited.

Anything of value exceeding AED 500 must be declared and subject to approval.

If you believe that a gift or entertainment is being provided with an intention, or could give a perception, to influence a business decision or action you must immediately report it.

[trustline@tecomgroup.ae](mailto:trustline@tecomgroup.ae)  
[tecomgroup.ae/trustline.html](https://tecomgroup.ae/trustline.html)

For further Information refer  
to the intranet portal:

**TECOM Whistleblower Policy.**  
**TECOM Marketing Guidelines.**  
**TECOM Anti Bribery and Anti Corruption Policy**



# WE DO NOT ENGAGE WITH ILLICIT FUNDS

We do not do business with criminals, terrorists and sanctioned governments, entities or individuals. We are all responsible for identifying and reporting any suspicious activity to TECOM Group's Anti-Money Laundering (AML), Combating Financial Terrorism (CFT) and Sanctions Policy.



TECOM Group is committed to complying with applicable anti-money laundering, counter-terrorism financing and sanctions laws and regulations. When requested, it is imperative that you assist the AML and Sanctions Compliance Office in carrying out the controls we implement to comply with these laws and regulations. Failure to do so may result in reputational harm and financial losses for the Company.



Money laundering is the process of hiding the proceeds of crime or making the source appear legitimate. Terrorist financing is the solicitation, collection or provision of funds from both legal and illicit sources to support terrorist acts or organizations.



Sanctions restrict TECOM Group's business dealings with specific governments and jurisdictions, as well as individuals and entities designated under programs related to terrorists and international criminal organizations, weapons of mass destruction, narcotics trafficking and more.



TECOM Group conducts its business in compliance with applicable anti-money laundering, anti-terrorist financing and economic sanctions laws and regulations. Our decision to do business with various partners and engage with customers is guided by an interest in following applicable laws and protecting our reputation.

## REMEMBER



Cash payments exceeding the threshold of AED 55,000/- either individually or cumulatively through a series of payments shall not be accepted.

If you do come across any such transactions, this should be reported to the compliance function.

Be wary of high volumes of business through a single customer, with complex transactions that can disguise the source of funds and are at odds with the Business Partner's profile.

Be alert for third-party payments, customers from high-risk countries known for corruption and most importantly overpayments and refund requests.

[trustline@tecomgroup.ae](mailto:trustline@tecomgroup.ae)  
[tecomgroup.ae/trustline.html](https://tecomgroup.ae/trustline.html)

For further information refer  
to the intranet portal:

**TECOM Whistleblower Policy**  
**TECOM AML, CFT and Sanctions Policy and Manual**



## REMEMBER



Avoiding conflicts of interest is an important way we can demonstrate our commitment to TECOM Group's Code of Conduct and support our strong ethical culture.

You must immediately declare your conflict of interest, abstain from any participation in the matter, transaction or business relationship and let another employee handle it.

You must never recommend to our Business Partners any service providers by colluding with a contractor and / or consultant.

The Conflict of Interest Declaration Form can be accessed on the Employee Services portfolio by logging on to the Oracle Portal.

For further information refer to the intranet portal:

**TECOM Related Party & Conflict of Interest Policy**  
**TECOM Human Capital Policy Manual**

# WE AVOID CONFLICT OF INTEREST

TECOM Group's reputation for excellence is a key competitive advantage and we must never do anything to put that reputation at risk. You must be sensitive to any activities, interests or relationships that might interfere with, or even appear to interfere with, your ability to act in the best interests of TECOM Group and our clients.



TECOM Group has a Conflict-of-Interest Policy to help us avoid conflicts of interest, actual or perceived, and the appearance of conflicts between our personal interests and those of the Company.



As TECOM Group employees, we share a common interest in protecting our company. We are transparent in our business dealings and avoid situations that put our personal interests in conflict with those of TECOM Group or lead others to question our business or professional objectivity.



If you become aware of a potential conflict, you have an obligation to disclose it. It is impossible to outline all potential situations where an actual or perceived conflicts of interest situation may arise, so we must use sound judgment in our day-to-day activities.



Conflicts of interest includes outside business interests or activities that compete against TECOM Group's business or where the time that you spend on them interferes with your work. This includes owning a business, serving as a director or advisor to another company, undertaking a second job, or being involved with a competitor business.



Personal relationships in the workplace such as: hiring or working closely with your Family (Spouse, siblings, children, parents, grandparents, grandchildren, aunts, uncles, nieces, nephews, cousins, step-relationships and in-laws and any other dependents) or friend; forming a romantic relationship with a colleague or with a business partner that you work closely with.



Conflicts of interest need to be declared to the Human Capital department using the Conflicts of Interest Form and are reviewed on a case-by-case basis so that appropriate guidance can be given on how to manage them.



The following illustration provide some examples detailing situations where it is considered a conflict of interest may or may not arise or exist. It is impossible to define all the potential areas where a conflict of interest may arise and therefore if a staff member has any doubt as to whether a conflict may exist, they should seek advice from their Line Manager.

### Example 1

Activities / Situations that clearly present such serious problems/issues as to be incompatible with TECOM Group policies, such activities are prohibited and should be reported immediately to the concerned authority for final decision on required rectification:

Being a partner, a consultant, an employee, or a member on the board of directors or any other committees of a competitor.

Accepting in any form whatsoever any remuneration or compensation from current or potential customers / suppliers / contractors or competitors.

Having a family member reporting directly to you.

Use of TECOM Group unpublished information for personal profit or assisting an outside organization by giving it unreasonably exclusive access to such information.

Using TECOM Group assets for your personal gain or for the benefit of others unless the same is authorized through a contractual arrangement or Policy.

Assuming responsibilities for an outside organization that diverts his attention from your TECOM duties or creates other conflicts of loyalty. These could be paid or unpaid positions.

### Example 2

Activities that appear to present potential conflicts of interest or commitment, in such situations/circumstances the Responsible Employee shall strictly exclude him/herself from any discussions, negotiations, voting or decision making related to the concerned transaction and shall declare the conflict of interest to the concerned authority for declaration/approval:

Being part of the decision making related to the provision of goods or services to TECOM Group while at the same time having a financial or other interests in one of the proposed suppliers (i.e., being a partner or a member of the board of directors, having one of his / her first relatives as a partner, an employee or member of the board of directors ...etc.);

Being part of the negotiation and decision making related to the provision of products or services to a customer while at the same time you or any of your first relatives having interest with such customer (i.e., partnership, a member of the board of directors, employment...etc.);

Being part of the decision making related to approvals of acquisitions, investments, or divestments while at the same time you or any of your first relatives having a financial interest or any other material interest in the other party.

Being part of the decision making related to recruitment, promotion, evaluation, grievance, termination, transfer or selection for training courses or study trips, where one or more of the nominees / candidates / employees is a family member to you.



# WE PROTECT OUR ASSETS AND INFORMATION

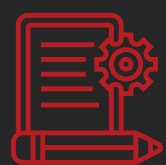
By protecting our physical assets, intellectual property and confidential business information and maintaining accurate financial records according to established guidelines, we ensure TECOM Group's continued business operations and success.



## DATA PROTECTION

The information entrusted to us by customers and other business partners together with the information we generate internally are vital assets and critical to our business. Our assets are vulnerable to security risks. Personal Data must be kept private, used for legitimate business purposes only, should not be disclosed, except as permitted by law or our policies and before sharing it you need to make sure that the recipient knows the information is confidential and understands how it is to be used or disseminated.

TECOM Group Subscribes to the International General Data Protection Regulation (GDPR) and the UAE's Federal Data Protection Law. The UAE Data Office acts as the central data protection regulatory authority. We ensure compliance to regulatory agencies by strictly enforcing the 'Data Governance Framework'.



## INTELLECTUAL PROPERTY

The innovative ideas we develop in our work, such as strategic document, business plans and the TECOM Group brand, are all forms of intellectual property. Protect our intellectual property — never disclose it to a third party without approval.

Also, remember that anything you create, design or develop within the scope of your work for TECOM is the sole property of our company. Our responsibilities also include respecting the intellectual property rights of others. We take care not to infringe copyrights, trademarks or other rights. Intellectual property is a critical component of our business and the business of others. We all must do our part to ensure that it is protected.

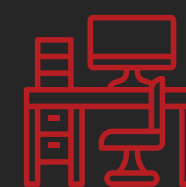


## DIGITAL ASSETS

Our technology resources, including computer hardware, software, mobile devices and tablets, are important to the work we do at TECOM Group. We rely on you to protect, secure and use them appropriately for business purposes. TECOM Group has strict rules about securing electronic assets in the office and while traveling.

Occasional personal use of things, like email or the web, is generally permitted, but use good judgment, and never access unauthorized websites (e.g., gambling or adult content). Understand that anything sent, received or downloaded on our systems is company property, in accordance with applicable law.

In addition, TECOM Group may review the contents of the information stored and processed on any systems at any time. Be careful in how you use our electronic assets and never use them to engage in illegal activity that violates our policies or anything that would negatively affect our company or its reputation.



## PHYSICAL ASSETS

Tangible assets like furniture, funds, supplies and facilities should be treated with care and measures need to be taken to prevent them from being lost, stolen or damaged.

Unless specifically authorized the use of company resources (office equipment, supplies, vehicles, machinery, etc.) or services (software, email, internet, etc.) paid for with official money for personal purposes or gain is prohibited.



# WE PROTECT OUR ASSETS AND INFORMATION

## Confidential Business Information

TECOM Group prohibits you from sharing confidential company data, including but not limited to financial information, about our customers or other business partners. This information provides TECOM Group with a competitive advantage and could cause harm if made public without permission. We all have a responsibility to protect confidential information from unauthorized access and disclosure.

### Some examples of confidential company data includes:



Financial records and information that may, if disclosed, be used to manipulate the share price



Personally Identifiable Information subject to Data Privacy/Protection laws and regulations



Business and marketing plans



Unpublished data and reports, including Financial Statement, Governance Reports, Appointments



Intellectual property

We all have a responsibility to protect our confidential business information. This responsibility does not end when you leave our company, you are still legally obligated to protect confidential information. Do not share it with any current, former or future employers. We depend on you to do what is right and take appropriate measures to preserve our confidential business information.

## TECOM Group Information Classifications

As a TECOM Group employee, you help protect the company and ensure its continued success by handling information according to established guidelines. Doing so helps the Company to comply with relevant laws and regulations and meet the expectations of customers, business partners and other stakeholders. We have deployed a measure to ensure all our information is labelled in accordance with TECOM Group Information Classification Policy. When prompted to classify an email or document in accordance with the content as Internal, Confidential, Secret or Public.

## REMEMBER



Treat our confidential business information with care — just as you would your own personal information.

Never install unapproved software, applications or hardware.

Never use unauthorized devices to access our network.

Never access unauthorized websites.

Never share passwords or access codes

Never share or disclose any internal, sensitive or confidential information with external parties, unless you are authorized to do so.

Never open suspicious or unsolicited emails.

You must immediately report any instance of theft, damage, or misuse of company assets, including information and data, and remember to maintain confidentiality.

It is prohibited to use private email accounts for business related purposes, or to share or forward business related information, including customer data, to personal email accounts.

For further information refer to the intranet portal:

**TECOM Data Protection Policy**  
**TECOM Information Security**  
**TECOM IT Policy Manual**  
**TECOM Data Governance Policy**  
**TECOM Record Retention Policy**  
**TECOM Facilities Management Standard**



## REMEMBER



Do not backdate contracts or any other legally binding documents.

Do not alter records or make false or misleading entries. Disposal of or destroying records that are required to be kept as per Retention Policy results in disciplinary and/or legal actions.

Do not sign any documents that you are not authorized to sign. If uncertain whether you can sign or not, check the Delegation of Authority (DOA).

For further information refer to the intranet portal:

**TECOM Document Retention Policy**  
**TECOM Document Management Policy**

# WE KEEP AND MAINTAIN IMPORTANT RECORDS

Keeping accurate records of TECOM Group's business activities is essential to meet our legal and regulatory obligations and for management purposes. Accurate record keeping and retention, particularly in respect of financial records in support of maintaining book of accounts and financial statements, is also a requirement under UAE law and the laws in the countries that we operate.



As a publicly traded company even our internal business records and communications may become public, which is one of the reasons why it is important to avoid exaggerated information, inappropriate language or characterizations or guesswork in our recordkeeping.



If accessing records is a regular part of your job, watch for any irregularities that might signal fraud, bribery, or other illegal activity. This includes false entries, discrepancies, omissions, misleading entries, or unrecorded funds. Raise a concern about any unusual activity immediately.



We should demonstrate our commitment to corporate governance, risk management and compliance by establishing proper controls towards the management, accessibility, and modifications of records.



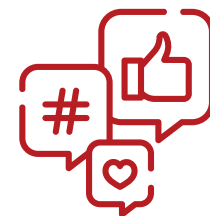
# WE SPEAK ON BEHALF OF TECOM ONLY IF AUTHORIZED

We are all stewards and brand ambassadors of the TECOM Group brand. We always strive to protect our brand and reputation. Everything we say on behalf of the Company affects our reputation. Anyone who speaks on behalf of TECOM Group must be authorized to do so by our Marketing & Communications team and ensure all messages are accurate, aligned with our brand and legally approved.



## Media and Press Inquiries

If a member of the media or someone from a research, industry analyst or investor firm contacts you with a request for a statement, comment, opinion or position on any topic, please refer these inquiries to the Marketing & Communications team. Any investor related inquiries should be directed to the Investor Relations Officer. You may not speak on TECOM Group's behalf without prior authorization and approval.



## Social Media

Social media is widely used socially and professionally. However, be thoughtful, respectful and cautious about what you choose to share online. Social media should never be used in a way that violates any TECOM Group policy or other legal or ethical obligation. Discriminatory remarks, harassment, threats of violence or other inappropriate or unlawful conduct will not be tolerated and may result in disciplinary action.

We expect you to use good judgment when you post information online about our company, fellow employees or your job. Always protect our confidential business information, ensuring you follow TECOM Group policies. You are responsible for any content you publish, and you may not speak on behalf of the Company without receiving prior approval.

## REMEMBER



Be clear when you post online that your opinions are your own and not those of TECOM Group.

Do not publish any confidential information online.

Do not disclose anything that could violate the privacy of our employees or clients.

Always be thoughtful and respectful.

Any derogatory comments about the Company, its Employees or Customers will render in disciplinary actions.

For further information refer  
to the intranet portal:

**TECOM Communication Policy**  
**TECOM Marketing Guidelines**



## REMEMBER



Employees must report all instances where they believe a risk to health and safety exists and is not covered under existing arrangements.

It is the responsibility of all employees to comply with all instructions and orders relating to health and safety in the workplace; including, the use of protective equipment.

Anti-social behavior including threats, intimidation or acts of violence are illegal and are prohibited.

Consuming or being under the influence of alcohol or illegal substances in the workplace, during working hours or while conducting business is dangerous and is prohibited.

Gambling or betting in or from the workplace or with work colleagues is prohibited.

The use of the Group's technology assets to access websites or applications or to share material that is illegal, offensive, or obscene is prohibited.

For further information refer to the intranet portal:

**TECOM Human Capital Policy**  
**TECOM HSE Policy**

# WE FOSTER A CONDUCTIVE WORKPLACE ENVIRONMENT

TECOM Group ensures a conducive working environment that ensures the protection and safety of all employees and visitors. Hence, it is imperative that all employees acquaint themselves with all the relevant rules, regulations, and obligations to maintain and sustain a safe work environment.

When it comes to health and safety concerns, compliance with legal requirements represents a minimum. When necessary and appropriate, we establish and comply with standards of our own, which may go beyond legal requirements. In seeking ways to protect health and safety, the issue of cost should not rule out consideration of any reasonable alternative.

In cases of accidents that result in injury, regardless of how insignificant the injury may appear, employees are required to immediately report any unsafe condition to the respective Line Manager. Such reports are mandatory to comply with regulations and to initiate workers' compensation.

Employees who violate safety standards (as communicated or described in safety manuals of the building or Real Estate Management Company), cause hazardous or dangerous situations, or fail to report such situations may be subject to disciplinary action, up to including termination of employment.

## We should ensure a good working environment is:



Fair and equitable.



Safe and supportive.



Free of alcohol and drugs.



Free of harassment and unjustified discrimination.



Free of smoking in areas where smoking is prohibited.



Values individual differences and cultural diversity.



Provides honest performance feedback and development opportunities.



Seeks staff co-operation in the decision-making process.



## FOR MORE INFORMATION

Our Code of Conduct outlines our principles and is not meant to be a guide for every possible situation you may encounter while working at TECOM Group. You may be facing difficult or complex situations and would like to discuss the matter. The first contact when seeking guidance should be your Line Manager.

However, there may be situations that warrant a discussion with someone else. Use any of the following resources to your questions and raise concerns if you see or suspect any activity that violates our Code.

[trustline@tecomgroup.ae](mailto:trustline@tecomgroup.ae)  
[tecomgroup.ae/trustline.html](http://tecomgroup.ae/trustline.html)

### REMEMBER



Always act with integrity and be honest.

Use sound judgement.

When in doubt, seek guidance.

Report any breaches.

Do the right thing, even when no one is watching.

Please access the SharePoint Portal 'The Hub' to refer to all relevant policies and procedures.





TECOM GROUP



@tecomgroupdubai