

Partner Code of **Business Conduct** and Ethics





Emirates Integrated Telecommunications Company PJSC

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Partner Code of Business Conduct and Ethics















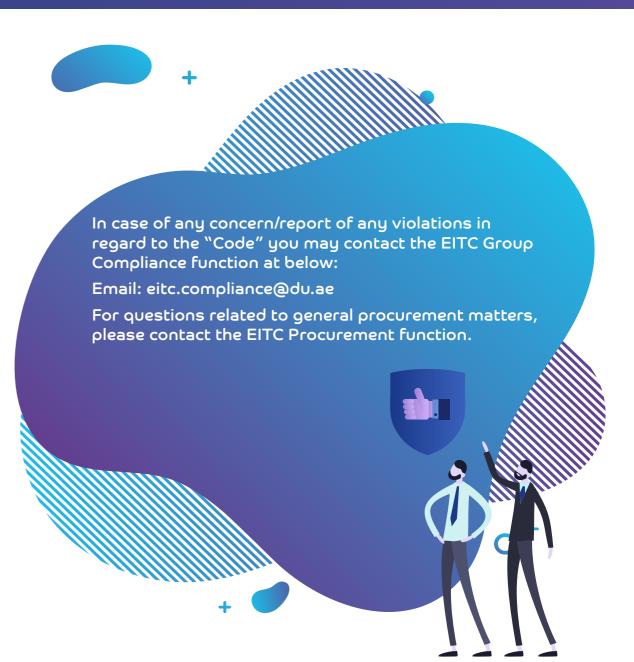
Introduction

The 'EITC Partner Code of Business Conduct and Ethics' (herein referred to as the "Code") applies to all the partners and their employees, agents or subcontractors (collectively referred to as "Partners" who will be working with EITC group, under any capacity or representing EITC).

This code sets out the minimum standards of ethical behaviours and integrity with which we expect our partners ("partner" means any party who supplies goods or provides services to the EITC Group or to another party for or on behalf of the EITC Group) to conduct their business activities. The principles set out in the code also applies to any contractor or subcontractor appointed by the partner, for or on behalf of the EITC Group.

We expect our partners to act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct, while working on our premises, at offsite locations where the EITC groups business is being conducted, at sponsored business and social events, or at any other place where the partner is representing or working for EITC.

Partners should ensure compliance with all applicable laws and regulations and work closely with EITC group in reporting violations and non-compliance to the Code. By doing business with the EITC Group, you are deemed to have gone through, fully comprehend and agreed, to best of their ability, to comply with this "Code".















EITC Group retains the right to amend this Code at its sole discretion. Our partners are responsible for ensuring that their employees, interacting with the EITC group, are familiar with the Code and any applicable requirements, for doing business with EITC. We will update the Code from time to time and the Code will be available on our website at www.du.ae

We request all of our partners to go through the Code and to ensure that all employees working on your behalf with the EITC Group, abide by the requirements and minimum standards set forth in the Code.

Respect

Human Rights

We expect our partners to respect the rights of all the employees and to ensure compliance with all the applicable local and global labour laws (including UAE labour law).

Forced and Child labour

We expect our partners to:

- Not employ any labourer who does not meet the required minimum age criteria.
- Ensure compliance to any other applicable Child Labour Laws/UAE labour law.





















Employment Practices

We expect our partners to honour the contract, you have entered with your employees and treat each and every employee fairly and equally. Partners are expected to:

- Set the minimum working hours and pay prescribed minimum wages to all employees, in compliance to applicable laws and regulation.
- Comply with all applicable national and international human rights laws and regulations.
- Not to discriminate any employees based on race, religion or colour etc. in hiring and employment practices.
- Not to harass, intimidate, threaten, abuse or exploit any employees.

Healthy and Safe Working Environment

At EITC group, we are fully committed to protect the health and safety of our employees and the safety of people at the workplace is a primary concern and we expect the same level of commitment from our partners. Partners are expected to provide their personnel, at minimum, the following:

- Safe and healthy environment.
- Comply with all applicable laws and regulation concerning health and safety of their employees.























Business Integrity

At the EITC group, we are committed to conducting business honestly, ethically and with integrity. We do not tolerate any form of bribery or corruption. Similarly, we strictly prohibit our partners to get involved in any activities related to money laundering, theft and any other fraudulent activities.

Anti-bribery and Anti-Corruption

Partners are expected not to offer or take any gifts in any form or manner and to comply with all applicable anti-bribery and anti-corruption laws and regulations and to behave in ethical manner in all business dealings for or on behalf of EITC group.

Gifts and Improper Payments

Partners are refrained from taking, requesting, offering, accepting, or promising any payments in any form (like any bribes or "kickbacks") either directly or through any other third party to gain any new business or influence any decisions in their favour. Partners should take appropriate steps to ensure that any personnel or agent or any contractor engaged in any form with EITC group also adhere to these mandatory guidelines.

Third-party Relations

Partners should conduct due diligence while selecting any third parties or sub-contractors, before engaging them to perform any work with the EITC group. Partners must ensure that the third parties, sub-contractors, etc. who are engaged in any form with EITC group, adhere to all the ethical and professional standards under the Code. Partners should collect the required information and continuously monitor the third parties to ensure that they are in compliance with the applicable laws and regulations. Third parties, contractors, agents, representatives or subcontractors should only be selected based on merit by conducting adequate background checks to assess the legitimacy of each third-party or subcontractors who are engaged in working with the EITC group.



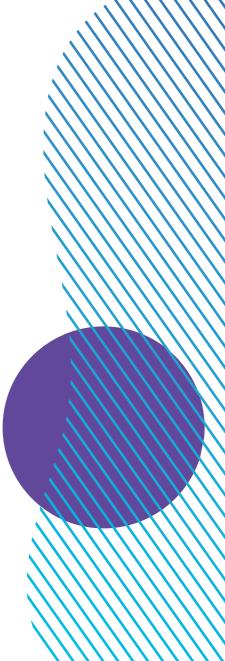


Payments





















Fair Business Practice

Partners should conduct their business in a fair and equitable manner and in compliance with all applicable Anti-Trust laws or any Competition Law. Partners may not collude with any other business partner or your competitor in any way providing with non-public information such as any new contracts, trade policies etc. especially concerning any business activities related to the EITC group.

Partners are required to abide by any international or local import and export laws or any other customs procedures while dealing with certain countries, entities and individuals. Partners should use fair business practices, including transparency and honesty while participating in any tendering or sourcing process, accuracy of information provided and during advertising. Partners are expected to adhere to EITC brand guidelines and should seek prior approval from EITC before any representation in media, advertising or promotion, that references or mentions or has implications on EITC.

Confidential Data and Information

Partners may have gained access to confidential data or information during their course of engagement with EITC. Every partner is expected to protect and safeguard such information, which they may have come across, and adhere to the Information Security and/or any other applicable data security and privacy laws and regulations. Our intellectual property should only be used strictly in accordance with permission provided by EITC.

All information collected must be kept in a secure and safe manner. Only authorised employees of the partner, with legitimate needs, should have access to such information collected. If a Partner generates or receives information, data and/or records pertaining to the EITC group as a result of the work performed by the Partner, the Partner must ensure that those records are returned back, destroyed etc. (as per the guidelines in the applicable Information Security related laws and regulations) to EITC pursuant to the fulfillment of our requirements. Any misuse of such confidential information is strictly prohibited.

Partners should always be careful about inadvertent disclosures that may arise in a social context or in normal discussions and correspondence with our employees. Partners should also avoid discussing confidential information or leaving sensitive information in public areas.

Partners are expected to take appropriate steps to ensure that no employees of Partners, engaged with EITC group, use such information which will harm the business or reputation of EITC, in any way. Using Unpublished Price Sensitive Information to undertake any insider trading and/or using the information to gain advantage over your competitors is unacceptable and strictly prohibited.



Anti-bribery and Anti-Corruption



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Transparency

At the EITC group, we encourage a culture of openness and accountability within the organisation to ensure that we reduce the risk of any of the activities within the business going wrong or by knowingly harboring malpractice. Similarly, we expect our partners to also adhere to a 'culture of openness and accountability' and work together with EITC in a cohesive manner.

Conflict of Interest

We expect our partners to avoid any activity that may create, or has the potential to create, any conflict of interest. In case you come across any such potential conflict, or you have any of your employee or senior leadership including any member of the Board has any relationship with the EITC group, which may resemble a conflict, you should disclose the fact to the EITC Compliance function in a timely and appropriate manner. Refer contact details of EITC Compliance function in the 'Introduction' section.

Conflict of interest may be due to any of the following reasons, including but not limited to: past employment, friends of family members with close interest or relationship with the EITC group, ownership in shares of EITC group, financial interests, board membership etc.

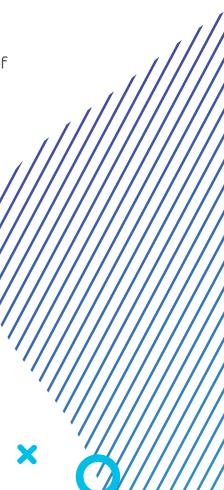
Record-Keeping and Compliance Investigation

Accuracy and transparency are core principles, which we expect our partners to adhere to at all times. This requires our partners to ensure continuous compliance with prevailing laws and regulations and maintain records, in line with applicable laws and regulations.

We expect our partners to report any such suspicious activity related to ethics and compliance to the EITC compliance function. We have the right to inspect your books, records etc., by the EITC group either directly or through any third-party representation for work done on behalf of EITC and expect you to cooperate with any internal or external investigations or any audit only associated with your engagement with EITC.



















Sustainability

We expect our partners to operate in a similar responsible manner and abide, to best of their ability, by not only the applicable health and safety laws and regulations but also internal HSE (Health Safety and Environment) policies, published on our website, within the EITC group.

We expect our partners to work in a responsible manner and consider the protection of the environment by working in an efficient and sustainable manner. Partners will be responsible to ensure that waste produced by the contractor is disposed of, as required by applicable laws and regulations.

Communication

The minimum standards prescribed in this code are critical for the long-term success of the relationship between the EITC group and its partners.

We encourage our partners to cooperate with the EITC group compliance function for resolution of any concerns, compliance investigations etc. by providing them with requested information including, but not limited to, relevant documents, access to employees of partners etc. We also strongly encourage our partners to report any incidents of non-compliance with the standard set forth in the code.

Information that you provide to EITC must be accurate to the best of your knowledge, and EITC expects you to assist us with any investigations of an incident or situation that you report to EITC. Reporting false information to EITC may result in EITC's termination of your business relationship(s) with us, including all related contracts.















Title	Details
Company name	Emirates Integrated Telecommunications Company Public Joint Stock Company
Policy name	EITC Partner Code of Business Conduct and Ethics
Version	1.0
Owner & Custodian of COBC&E Policy	EITC Compliance function
Approver	Audit Committee & Board of Directors of EITC
Contact details	Report any questions or concerns to: eitc.compliance@du.ae



