

CODE OF CONDUCT

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POLICY OVERVIEW

The standards upheld by EMAAR INDIA are fundamental to our business success. It is essential that all employees understand and adhere to these standards, both as individuals and as members of a team.

This policy defines the expectations for acceptable business conduct and the consequences of any behaviour that does not align with the company's values.

EMAAR INDIA is committed to maintaining the highest levels of professionalism, integrity, honesty, and fairness, ensuring a work environment that is free from discrimination and harassment. Employees are expected to conduct themselves in a manner that reflects these values and to avoid any actions that could harm the company's interests or reputation.

GLOSSARY OF TERMS

#	TERM	EXPLANATION
1.	Code of Conduct	A formal document outlining the ethical principles, expected behaviors, and compliance standards employees and business partners must follow
2.	Company	Refers to Emaar India Limited, including all its subsidiaries and affiliated entities. The definition of 'Company' shall be applied accordingly across all policies
3.	Company Property	Refers to any physical or other property that is legally owned and controlled by the company, including accommodation premises and information
4.	Confidential Information	Refers to Confidential Information, which includes (without limitation) all and any information in any shape or form, whether on paper, electronic means or otherwise, relating to the financial position, market position, business strategy, business plans, maturing new business opportunities, research and development projects, sale statistics, marketing surveys, marketing plans, costs, profit or loss, prices and discount structures, technical data, business methods, the names, addresses and contact details of business contacts, business partners, customers and potential customers, existing and respective clients, suppliers and potential suppliers, contractors, and employees and any other information related to EMAAR INDIA
5.	Business Partners	Includes entities and individuals serving as vendors or channel partners for Emaar India
6.	Employee	Refers to any person working for a wage of any kind, in the service or under the management or control of the company, (Including outsourced staff)
7.	HR (Human Resources)	Refers to HR Business Partner
8.	Gross Misconduct	Any act of serious wrongdoing or a severe violation of Company policies that can cause reputational, financial, or operational damage.
9.	Local Laws	Refers to laws applicable in India
10.	Manager	Refers to a person of authority who is responsible for supervising the department employees
11.	Culture	Refers to the set of values, beliefs and relationships that guide the decisions of the company in order to achieve its goals and objectives

12.	Compliance	Refers to the obligation of employees and business partners to adhere to applicable laws, regulations, and Company policies.
13.	Policy	Refers to a set of basic principles and associated guidelines, formulated and enforced by the Company, to determine the implementation of strategy and to direct the plans, decisions and actions of employees towards the achievement of company objectives
14.	Recording	Refers to the use of any device to capture images or voices, regardless of whether in person, by telephone or by other means, such as videoconferencing, screen shots, click-to-chat/messenger or in writing
15.	Social media	Refers to internet-based tools including but not limited to internet forums, networking sites such as Facebook, Twitter, Instagram, LinkedIn, TikTok, Snapchat, Signal, Telegram, YouTube, Google Plus, Web Casts and blogs, etc.
16.	Insubordination	Refers to the refusal to comply with reasonable and lawful instructions from superiors, which may be considered gross misconduct
17.	Watch Outs	Refers to specific behaviors, actions, or situations outlined in the Code that employees must avoid to ensure ethical and legal compliance.
18.	Termination	Refers to the process of the company ending an employee's services
19.	Family	Refers to an employee's immediate family members, including spouse, children (biological or adopted), parents, siblings, in-laws, and siblings-in-law.
20.	Workplace	Workplace includes Emaar India's buildings, offices, project sites, and any premises where employees, contractors, or service providers work, as well as any place visited in connection with employment. It also includes Emaar India-provided transportation, business travel for meetings, conferences, exhibitions, workshops, or training, Emaar-sponsored events such as offsites, parties, picnics, and educational trips, digital workspaces such as virtual meetings, emails, phone calls, video calls, and messages, and Emaar India-provided facilities or accommodation such as cafeterias, gyms, and guest houses.
21.	Post-Employment Restriction Period	Refers to the period of twelve (12) months immediately following the cessation of an employee's employment with the Company, howsoever arising, during which the post-employment obligations set out in this Code shall remain in force.

WHY THE CODE?

This Code serves as the cornerstone of our organization's commitment to ethical and responsible business practices. It is designed to provide clear guidance and principles that govern how we conduct ourselves as committed employees of the company, ensuring that every member of our team understands and upholds our core values. Our Code is essential for promoting transparency, maintaining trust with our stakeholders, and safeguarding our reputation. It sets the standard for integrity, accountability, and compliance, which are vital for our continued success and the prosperity of all those associated with our business. Whether we face an everyday dilemma or something more serious, as individuals or as a business, Our Code is here to help us:

- Make good decisions and do what's right.
- Remember that each of us is committed to our actions and that the ethical choice is always the best choice.
- Provide a roadmap for how we govern our business.

- Encourage employees to ask questions when in doubt, raise concerns or issues, and provide clarity on those questions relating to ethical conduct.
- Help you deal with any questions or concerns, fast and efficiently, that you may have related to our business conduct.
- Create a collaborative and honest environment where we can achieve our best work legally and with integrity.
- Foster strong relationships among our employees and business partners through trust.

Please take time to familiarize yourself with Our Code, discuss it with your colleagues, and refer to it whenever you need further guidance.

WHO IS OUR CODE FOR?

The Code applies to all Employees of EMAAR INDIA LIMITED, and all its entities and subsidiaries (referred to as "**the Company**"). It is a public document available to everyone, and its principles shall apply to the following groups:

Employees:

- Our employees
- Our trainees and interns

The Code further provides guidance for expected behaviour and ethical standards for each group listed above and below persons:

Business Partners: Our Business Partners (including but not limited to channel partners, suppliers, contractors, dealers, distributors, advisors, agency staff, vendors, or consultants)

Other Stakeholders:

- Other stakeholders associated with the Company
- Service providers engaged by the Company

A statement of compliance with our Code shall be deemed accepted by each Employee as stated above upon acceptance of the annual increment or performance bonuses for existing employees and annually as per the format annexed as Annexure I, and upon signing of the Offer Letter for new employees. The "watch outs" and things to be followed or prohibitions mentioned in the Code and/or any other prevailing policies of the Company are sacrosanct and must be complied with at all times. Any failure to follow the Code and/or any policy of the Company will be construed as an act of Gross Misconduct, which could lead to disciplinary action, including termination from employment with the Company.

OUR EMPLOYEE RESPONSIBILITY:

- **Familiarize with the Code:** Employees must read and be familiar with the information in Our Code.
- **Adherence to Values:** Act in accordance with our values, principles, vision, and goals, applying them daily in every decision you make.
- **Fair Conduct:** Conduct business in a manner that is fair, transparent, and prudent.

- **Compliance:** Understand and comply with applicable laws, regulations, and the Company's policies and procedures that govern our business and operations globally.
- **Report and Escalate:** Immediately report unacceptable conduct and promptly escalate potential or occurred violations.
- **Cooperation in Investigations:** Cooperate with any investigation and be truthful and forthcoming during such investigations.
- **Training and Acknowledgment:** Attend the annual Code training and acknowledge your understanding and compliance with the Code principles.
- **Post-Employment Compliance:** Acknowledge and comply with the post-employment obligations set out in this Code, including the requirement to disclose and seek prior written permission before joining any Business Partner of the Company within the Post-Employment Restriction Period.

What is Gross Misconduct?

Gross misconduct is a serious breach of contract that may severely damage our business, reputation, or the trust between the Company and the employee. It includes, but is not limited to, the following examples:

- A. Theft or Fraud:** Unauthorized taking or fraudulent behavior, including falsification of records.
- B. Physical Violence or Bullying:** Any form of physical violence, intimidation, or aggressive behavior towards others.
- C. Psychological Abuse, Discrimination, and Harassment:** Includes intentional infliction of emotional distress, discrimination, harassment, and bullying.
- D. Serious Damage to Property:** Deliberate and significant damage to Company or third-party property.
- E. Misuse of Company's Property or Name:** Serious misuse of the Company's resources or reputation for personal gain or other unauthorized purposes.
- F. Misuse of Electronic Communication Facilities:** Using the Company's internet, email, phone, or fax for any illegal purpose or in a manner that causes interference or disruption to other network users, services, equipment, or information assets.
- G. Accessing Inappropriate Content:** Deliberately accessing internet sites containing pornographic, offensive, or obscene material.
- H. Unauthorized Recording:** Using cameras, mobile phones, or any recording devices without consent to capture and/or distribute images/videos of private, confidential, or copyrighted documents, materials, property, or facilities that are not accessible to the general public. This includes capturing images of any person, object, act, or incident where the image would reasonably be considered inappropriate or offensive.
- I. Serious Insubordination:** Refusal to comply with reasonable and lawful instructions from superiors.
- J. Unlawful Discrimination or Harassment:** Any form of unlawful discrimination, victimization, or harassment based on race, gender, age, disability, sexual orientation, religion, or any other protected characteristic.
- K. Disrepute to the Company:** Actions or behavior that seriously harm the Company's reputation or standing.
- L. Unauthorized Selling or Promotion:** Selling or promoting products or services on behalf of another organization or working for another company without EMAAR's written approval.
- M. Incapability Due to Substances:** Being seriously impaired at work due to alcohol or illegal drugs.

- N. Negligence:** Causing loss, damage, or injury through serious negligence or dereliction of duty.
- O. Health and Safety Breaches:** Serious violations of health and safety rules that endanger oneself or others.
- P. Breach of Confidence:** A serious breach of trust or confidentiality, including unauthorized disclosure of Company information.
- Q. Post-Employment Breach:** Joining, accepting employment with, or providing services to a Business Partner of the Company within the Post-Employment Restriction Period without making the required disclosure and obtaining prior written permission from the Company, as set out in this Code.

This list is intended as a guide and is not exhaustive. Other actions or behavior not listed may also constitute gross misconduct if deemed severely damaging to the Company or the working relationship.

OUR MANAGERS RESPONSIBILITY:

- Lead by example and empower others to deliver by reinforcing the principles of our Code throughout all levels of our workforce.
- Serve as a positive role model and inspire others to embrace our Code.
- Emphasize the importance of ethics and integrity and make it clear that you expect work to be done ethically.
- Create an open work environment where team members feel comfortable voicing their opinions fearlessly.
- Help employees understand our Code and direct them to resources to help them live the Code every day.
- Help your team members understand the principles and expectations of our Code, the Company's requirements, and applicable laws.
- Take any concerns raised by an employee seriously that compromise our Code and determine if the issue should be escalated.
- Take corrective or preventive action in case of a violation of our Code.

HR TEAM'S RESPONSIBILITY

- Coaching managers about their people management responsibilities and their role in ensuring a positive work environment in the organization as and when required
- Communicating policy matters to staff during orientation and training
- Re-communicating the policy on an annual basis
- Conducting, misconduct and grievance investigations in accordance with company policy

SPEAK UP AND SEEK HELP:

- Speak up if you see or suspect a violation of our Code.
- You should feel comfortable asking a question or reporting a concern using whatever channel or resource you prefer.
- You don't need to have all the information or details to speak up or seek help.

- You can trust that your question or concern will be treated seriously and dealt with promptly and as confidentially as possible.
- You may write to the Human Resource Department to seek any clarification with regard to the Code.
- You may report violations of the Code by any employee or business partner anonymously.
- We have outlined the detailed procedure to report any instance of violation in the Whistle Blower Policy.
- Any violation or non-compliance with Code principles, policies, procedures, or applicable regulatory requirements shall lead to disciplinary actions involving written warnings, imposition of fines or penalties, withdrawal of increments, withholding promotions, suspension, termination from service, and even prosecution in a court of law.

When raising a complaint, endeavor to provide the following information:

- A clear description of the violation or concern.
- The name(s) of the individual(s) involved, if known.
- Relevant dates, times, and locations of the incident(s).
- Any supporting documents, if available.
- Any witnesses who may have relevant information.
- Any steps you have taken so far, if applicable.

Channels to report violations to the Code:

Email and Written Complaint:

Name of Compliance Officer: Mr. Bharat Bhushan Garg

Email of Compliance Officer: Bharat.Garg@emaar.ae

ANONYMITY AND CONFIDENTIALITY:

- Communicate your concerns openly.
- Treat all contacts and investigations as confidential as possible, consistent with the need to investigate and address the matter and subject to applicable laws and regulations.
- Report with your identity or anonymously without providing your name or other identifying information when submitting your concern.

ZERO TOLERANCE FOR RETALIATION:

The Company does not tolerate retaliation for reporting a concern or participating in an investigation.

If you feel that you have been retaliated against for reporting a concern, contact your Compliance Officer or Human Resources Department.

Discouraging any employee or colleagues from reporting an ethics concern is prohibited and could result in disciplinary action.

Reporting an issue in good faith will not get you in trouble, even if you make an honest mistake.

Knowingly reporting false information is contrary to our values and will be subject to disciplinary action.

We share information only on a need-to-know basis. If you are asked to participate in an investigation, give honest and complete answers, and do not discuss the investigation with other employees.

We have a strict Whistleblower policy, [which you can visit here](#).

1. OUR RELATIONSHIP WITH EACH OTHER

"Our dealings with each other should be based on mutual trust and dedication to one another and our Company. We are responsible to ourselves and the Company to treat each other with respect and dignity."

Successful working relationships are built on trust. We take pride in the strong personal commitment of our people and the excellence in achievement resulting from that commitment. But this level of cooperation can only be achieved in a climate of trust and mutual respect. All your dealings with your peers, your subordinates, or your supervisors should be conducted as a partnership, where everyone's behavior is governed by an overriding commitment to the Company's success. Your relationship with those you work with should be as a member of a winning team. People working in harmony and focused on a set of mutual objectives are the driving momentum behind our business. For this dynamic team relationship to work, each individual must fulfill his or her obligations and responsibilities - and feel assured that others will also. This means providing the necessary support to others, at every level, to get the job done. No individual or business unit can let their own priorities supersede those of the Company. Your relationship with those you work with or supervise should set an example of decency, fairness, and integrity in dealing with others. As a leader, you are responsible for clearly defining standards of performance and creating an environment that is conducive to teamwork.

Communicate openly and honestly. Encourage creative and innovative thinking, and if you are a supervisor, give your subordinates the freedom necessary to do their jobs. Provide suggestions for performance improvement. Your relationship with your supervisor should be one of mutual respect and trust. You and your supervisor are a team with the shared purpose of achieving the goals set for your unit by the Company. You are as responsible as your supervisor for ensuring that the communication between you is open and honest. Take the initiative as often as you can. Be innovative in solving problems. Your cooperation and creativity are essential to achieving the goals of your team and the Company.

People are our greatest resource.

Diversity, Equity & Inclusion We are committed to treating each other with dignity, which means appreciating and respecting diversity. We make all our employment decisions ethically and truthfully, without regard to race, caste, color, religion or belief, sex, age, national origin, citizenship status, marital status, military/veteran status, genetic information, LGBTQ, gender identity, physical or mental disability, or any other characteristic protected by applicable laws. We shall respect everyone and enrich our own culture through the diverse skills, experiences, and backgrounds that each of us brings to the Company. When we respect and value one another, we succeed individually and as an organization.

Watch Outs:

Provide equal employment opportunities to all candidates based on qualifications and skills.

Examine unconscious biases and take steps to create an inclusive work culture that makes every employee feel comfortable and inclusive.

Welcome ideas, opinions, and ways of thinking that may be different from our own and prohibit exclusionary behaviors.

Leverage the diversity of the people who work at the Company to provide strategic input on our products, applicable policies, programs, and practices and apply these learnings to build for all.

Anti-discrimination and Anti-harassment:

"Remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions. If you or someone else is the subject of discrimination or harassment, speak up and report it."

We are committed to providing a conducive and safe work environment that is free from any form of discrimination or harassment. We are committed to preventing employees against workplace sexual harassment and to ensure effective redressal. We should be mindful of what behaviors are considered harassment or discrimination and create a respectful and inclusive workplace. We do not tolerate any form of abuse or harassment. This includes actions that can reasonably be considered offensive, intimidating, or discriminatory. Never engage in workplace harassment, which includes unwelcome verbal, visual, physical, or other conduct of any kind that causes others to feel uncomfortable or creates an intimidating, offensive, or hostile work environment. We have a Policy on Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) and an active Internal Complaints Committee (ICC) under the same.

Watch Outs:

Be fair and respectful to employees and business partners.

Report harassment or discrimination to your Compliance Officer or Human Resources Department.

Report any instance of sexual harassment to the Company's POSH Committee.

The Company's fundamental policy is that we will treat all colleagues equally with respect. Beyond legal compliance, we strive to create an environment considerate of all employees. The Company strives to provide a safe, healthy, and productive work environment. This includes being free of violence for our employees, contractors, visitors, etc. Each employee has a personal responsibility to other Company employees and to the Company to help eliminate actions or circumstances that may undermine such an environment.

Provide a work environment free of improper harassment and bullying. We recognize the power that comes from people of diverse backgrounds and experiences coming together around a common goal. Our policy forbids any discrimination, harassment, or intimidation because of race, color, religion, gender, age, national origin, citizenship, sexual orientation, or disability. We all have a role in maintaining a corporate culture based on:

- Be respectful of cultural differences.
- Act with respect and fairness toward others.
- Treat everyone with dignity.

Encourage open communication and listen to those who speak up. In today's fast-paced and dynamic business environment, it is of paramount importance for us to maintain a safe, healthy, and productive workplace for all employees. To uphold these principles, our Code outlines key guidelines to ensure a workplace free from the adverse effects of substance and alcohol abuse. Every employee is expected to perform his or her work in a safe manner, free of any influence, including that of alcohol or drugs. Any exchange of any such item, for financial consideration or otherwise, is also prohibited.

We must ensure the following:

- Never work under the influence of drugs or alcohol as it may pose an unacceptable safety risk to yourself and others.
- Perform your job duties free from the influence of any substance that could impair job performance.
- Seek assistance from your Human Resource manager or Compliance Officer if you have a drug or alcohol addiction.
- Avoid indulging in any illegal or immoral activities, which may include but are not limited to possessing, selling, using, and/or transferring any of the illegal drugs or substances.

Always exhibit behavior that is consistent with applicable laws and regulatory requirements to avoid any reputational impact to the Company.

We strive to provide training, education, and promotional opportunities that permit development and career advancement for our employees. We will conduct performance appraisals with the goal of giving candid and accurate feedback. We encourage two-way communication and discussion and to afford a review of appraisals by higher levels of management. We compensate for performance and recognize and reward contributions made by individuals and teams that exceed their normal job duties.

We avoid favoritism or the appearance of favoritism in the workplace in accordance with the policies and procedures adopted by the Company. We respect an individual's privacy and dignity and acquire and retain only that information, personal or otherwise, which is required for the effective operation of the Company or required by any law, regulation, or this Code.

We strive to eliminate potential hazards from the workplace and provide a safe and healthy work environment for our employees and to comply with all applicable occupational safety and health laws and standards.

To help ensure a safe, healthy, and productive work environment for our people and others, we prohibit the sale or use of illegal drugs, alcohol or substances on Company time or property; we prohibit the use or possession of weapons and firearms on Company premises, including in vehicles or on other private property that may be visited while conducting our business and to report any such case of drugs or alcohol abuse or weapons possession to management immediately.

Smoking and Substance Use

In the interest of public safety, a strict No Smoking Policy is observed in the company, in all places of operation. Where available, employees may use approved designated smoking areas. The use of vapes/e-cigarettes, tobacco in any other form, and narcotic substances is strictly prohibited.

Watch Outs:

A hostile work environment (for example, telling jokes or displaying materials that ridicule or offend a member of a race or ethnic group)

Allowing race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status, or other characteristic protected by law to be a factor in hiring, promotion, compensation, or other employment-related decisions.

Indulging in any action or activity prohibited under the Sexual Harassment Policy or definition.

Violating labor law of the country (for example, hiring an individual who is under the legal minimum age)

Refusing to work or otherwise cooperate with certain individuals because of their race, caste, religion, sex, etc.

Disclosing employment or employee data to a person who does not have the business need, authority, or the Company's and subject's consent.

Use of alcohol, drugs and substances during working hours or on Company's property.

2. OUR RELATIONSHIP WITH THE COMPANY

We strive to adhere to the guidelines and objectives provided by the Company and give our best efforts to improve the Company's performance. We will recognize the trust and confidence placed in us and act with integrity and honesty in all situations to preserve that trust and confidence. Thus, we endeavor to avoid conflicts of interest and other situations that are potentially harmful or cause any prejudice to the Company.

Conflicts of Interest

We are committed to upholding the highest ethical standards in all our business activities. This includes identifying and addressing potential conflicts of interest that may compromise the integrity of our operations. This section outlines our policies and procedures for addressing and mitigating conflicts of interest.

Conflict of Interest (Employees)

All our employees shall act in the best interest of the Company. We avoid a conflict, or an appearance of a conflict, between personal interests and the Company's interest. Conflicts of Interest distort judgment, which we regard as one of your most valuable assets. Accordingly, you must act with honesty to recognize and avoid conflicts of interest that can interfere with your ability to make objective business decisions, especially when personal relationships, outside parallel employment, or investments are involved. On the job or in your free time, nothing you do should conflict with your responsibilities at the Company. No activity at work or at home should harm the Company's name or reputation. Misusing Company's resources or influence is also prohibited. All employees are obligated to act solely in the best interests of the Company. Employees, must promptly disclose any actual or potential conflicts of interest in relation to their immediate family members ("**Family**") or otherwise in writing or via email to the HR Department as soon as they arise. It is mandatory that all employees sign the "Non-Conflict of Interest Form" at the time of joining the company or as and when requested by the company. Additionally, employees should include any such disclosures in their annual disclosure as per Annexure I to the HR Department.

Business, Financial, and Personal Relationships

A conflict of interest arises when an employee has a personal relationship or financial or any other interest that could interfere with their obligations and duties toward the Company, or when an employee uses their position with the Company for personal gain for themselves and not for the Company. The Company requires that employees disclose all potential conflicts of interest and take necessary actions to eliminate the conflict without prejudicing the rights and interest of the Company.

Gifts, Entertainment, and Gratuities

We responsibly invest in our business relationships but ensure we never accept or offer gifts, entertainment, or anything else with an intent to improperly influence people. Our guidelines on gifts, entertainment, and gratuities are incorporated within the Company's Code of Business Conduct. These guidelines are designed to preserve and maintain the Company's reputation as an enterprise that acts with integrity and conducts business based solely on legitimate business considerations. Receiving gifts, entertainment, or other gratuities from people with whom we do business is not acceptable because doing so could imply an obligation on the part of the employee and Company and could easily create a conflict of interest. You must comply with the following requirements:

Accept only customary gifts or those of nominal value, provided they are below INR 10,000 threshold.

Ordinary and usual business entertainment (e.g., meals, sporting events) is acceptable, provided it is not excessive or frequent enough to raise concerns about propriety. The received gifts shall be duly disclosed to the Compliance Officer for consultation.

Watch Outs

Questions you must consider while receiving business gifts, entertainment & hospitality:

Will this activity or relationship influence or appear to influence my ability to make sound and unbiased business decisions or otherwise interfere with my ability to do my job?

Will I personally gain something or will a family member benefit from my involvement in this activity based on my status as an employee of the Company?

Will my action cause me to put my interests ahead of what's best for the Company?

Post-Employment Obligations — Joining Business Partners

Employees may, in the course of their employment, gain access to Confidential Information, trade secrets, proprietary business methods, customer relationships, and strategic plans of the Company. Since the Company's relationships with its Business Partners are commercially valuable, employees must protect these interests even after leaving the Company.

Any employee who, within the Post-Employment Restriction Period, intends to accept employment, consultancy, a directorship, or any other engagement, whether paid or unpaid, with any entity or individual that is, or was at the time of the employee's departure, a Business Partner of the Company, must disclose the same in writing to the Human Resources Department and the Compliance Officer before accepting or commencing such engagement.

No former employee may accept or commence such engagement unless they have received prior written permission from the Company. The Company will endeavour to communicate its decision within fifteen (15) working days of receiving the disclosure. Approval may be granted with or without conditions, including restrictions on the scope of the role or access to Confidential Information, or may be withheld on reasonable grounds, with reasons communicated in writing.

This requirement is in addition to the employee's continuing obligation to protect the Company's trade secrets, proprietary information, and Confidential Information, which continues after employment ends until such information becomes publicly available.

Note: For the purposes of this section, Business Partner has the meaning given in the Glossary of Terms and includes any entity or individual that held such status at any time during the final twenty-four (24) months of the employee's employment with the Company. This provision is consistent with the Code's existing restrictions on employees professionally assisting or working for a supplier, vendor, customer, or competitor during employment, and extends the same principle to the post-employment period.

Investment Decisions

Do not make any investment that might affect your business decisions. Company Code contains prohibitions against Company employees owning stock or having a proprietary interest in a company competing with or doing business with the Company. If you have made this kind of investment before joining the Company, report the facts to the Human Resources Department. This prohibition may not apply to owning small amounts of stocks of a publicly traded company. Disclose existing membership in the board, trust, or committee of any other organization and get approvals before accepting officer or director positions with an outside business while you are an employee of the Company even in non-executive roles. Please also disclose all the Directorship or ex-officio positions held and or retained by you in any organization before joining and continuing to retain while in the employment of the Company. Disclose investment in any of the companies having a business relationship with the Company and notify your line manager, Human Resource Department and obtain written approval from your Function Head before doing business on behalf of the Company with any company in which you or a close family member may in any way benefit from your actions.

Subject to receipt of written approval mentioned above, recuse yourself from any business transaction involving any of your family members or close relatives.

The Company discourages the employment of relatives in positions or assignments within the same department and prohibits the employment of such individuals in positions that have a financial dependence or influence (e.g., an auditing or control relationship, or a supervisor/subordinate relationship). Do not professionally assist or work for a supplier/vendor, customer, or competitor while working for the Company, or do any work for, or provide assistance to, any third party that may adversely affect your performance or judgment on the job or which causes any prejudice to the interest of the Company.

Watch Outs

- Financial Interest in a company where you could personally affect, impact, or prejudicially affect the Company's business with that company (for example, a customer, supplier/vendor, or investment).
- Part-time jobs or employment or activities (including consulting and advisory) where you may be tempted to spend time on that such job/employment/activity during your normal working hours or negatively affect your performance or responsibilities or where you may be tempted to use company equipment or materials.
- Gifts from suppliers/vendors, customers, or competitors while you can influence the Company's decisions that might affect or appear to affect any third person.
- Personal discounts or other benefits from suppliers/vendors, service providers, or customers not available to the general public or other Company employees.
- Accepting an offer to purchase "friends and family stock" in a company issuing shares through an initial public offering (IPO) if you interface with that company while performing your employment obligations at the Company.
- Directing business to a supplier/vendor owned or managed by a related person or close friend or abusing your authority to influence or facilitate business favors to your family members or relatives.
- Misusing Company resources, your position, or influence to promote or assist a third-party activity.
- Hiring, promoting, or supervising an immediate family member or a close friend or having a direct or indirect line of reporting to a family member or having the ability to influence that person's employment opportunities or compensation.
- Personal relationships that may create a conflict of interest with your responsibilities or compromise company interests.
- Taking or diverting any business opportunities that arise in the course of doing your job at the Company that could be of interest to the Company.
- Engaging in a business relationship or activity with anyone who is a party to a transaction with the Company.
- Being able to derive an improper benefit, personally or for any of your relatives, by making or influencing decisions relating to any transaction.
- Conducting business on behalf of the Company or being able to influence a decision about the Company's business with a supplier/vendor or customer where a relative is a principal officer or representative, resulting in a benefit to you or your relative.
- Recommending or awarding undue benefits, such as an inordinate increase in salary or other remuneration, posting, priority promotion, or recruitment of a direct relative or family member.
- Having a relationship, financial or otherwise, with any supplier, customer, vendor, or investor that might conflict or appear to conflict with your obligation to act in the best interest of the company.

- Joining or accepting any role with a Business Partner of the Company after leaving employment without first making written disclosure to the Human Resources Department and Compliance Officer and obtaining written permission from the Company.

Unethical Business Practices Leading to Potential Financial Loss

If employee becomes aware of workplace malpractices / unethical business practices, they should raise it directly to Internal Audit Team or Human Resources Department.

Unethical business practices that violate company policies and should be reported:

- Actual or suspected financial misappropriation (inclusive of handling and reporting money or financial transactions) and fraud
- Conflict of interest leading to potential financial loss
- Incorrect (Intentionally prepared)/ false expense reimbursements
- Forgery or alteration of any document (financial or otherwise) or account belonging to the company leading to potential financial loss
- Misappropriation or theft of company assets inclusive of funds and securities
- Authorizing or receiving compensation (in case or in kind) for goods not received or services not rendered
- Profiteering as a result of insider knowledge of company activities
- Inaccuracy in maintaining the company's books of account and other financial records
- Data irregularity and inappropriate and/or unauthorized sharing of company sensitive information
- Any dishonest, fraudulent act or criminal activity leading to potential financial loss

Lending & Borrowing

Employees with lending authority must strictly follow company policies and shall not grant loans to themselves, a member of their family or to companies in which they or a member of their family has a financial interest

Employees must not lend or borrow money from each other

Dealing with Charity Organizations

Employees who are approached or receive a request for a company donation from a charitable organization, the request must be referred to CEO, India for consideration. Gifts, donations or the giving of any corporate promotional item to any person or company should only occur after careful consideration by Senior Management or CEO, India (if required).

Trade Secrets and Proprietary Information (Intellectual Property)

- The Company respects the intellectual property of competitors, business partners, and other third parties. The Company's intellectual property is an invaluable asset and must be protected at all times. All employees must work to safeguard trade secrets, trademarks, copyrights, proprietary information, and other internal information. It is critical that we also respect the valid intellectual property rights of others.

- All material produced by an employee during the course of their employment is considered to be company's intellectual property for which the employee has already been compensated by the company through their salary.
- Unauthorized transmission of patents, trade and business secrets knowledge may lead to extremely high losses to the Company and may expose the company and even individual employees to lawsuits and damages.
- A key to protecting our Intellectual Property and guarding against these risks is the timely and reasonable review of new services, processes, software, and trade secrets and infringement of the intellectual property of others.

Your obligations with respect to Company internal information, trade secrets, and proprietary information are:

- Identify and protect Company's Intellectual Property.
- Do not disclose any internal Company information to third persons outside the Company.
- Do not use Company's internal or proprietary information for your own benefit or the benefit of persons outside the Company.
- Do not disclose any Company information to other Company employees or associates except on a "need to know" or "need to use" basis, and that too with a direct statement that the information is Company's trade secret.
- Company's internal information, trade secrets, and proprietary information include business plans, research, new projects, new product plans, strategic objectives, any unpublished financial or pricing information, employee, customer, and vendor lists, and information regarding customer requirements, preferences, business habits, and plans. The above list is indicative and not exhaustive and suggests the wide variety of information that also needs to be safeguarded.
- If you leave the Company, your obligation to protect Company's trade secrets and proprietary information continues until the information becomes publicly available or the Company no longer considers it a trade secret or proprietary. You should also remember that any correspondence, printed matter, documents, or records of any kind, specific process knowledge, procedures, special Company ways of doing things - whether confidential or not - are all the property of the Company and must always belong to and remain in the possession of the Company or its authorized employees.
- Diverting any business opportunities that the company may be engaged in or interested in pursuing or using/sharing non-public information to further business decisions
- Respect valid patents, copyrighted materials, and other protected intellectual property of others. Consult with company legal department concerning necessary licenses or approvals to use such intellectual property.
- Consult with the company's Human Resources Department before soliciting, accepting, or using proprietary information of outsiders, for example, former employers of any Company employee.
- Consult with the company's Human Resources Department before disclosing Company's proprietary information to outsiders.
- Do not permit third parties to use the Company's intellectual property, even for plain, simple research-related uses.

Watch Outs

- Accepting third-party proprietary information from an outsider without first consulting the company's Human Resources Department or Legal Department.
- Discussing, sharing, transferring Company's proprietary information with customers or supplier's vendors.
- Discussing with anyone suspected of infringing any of the Company's intellectual property without first consulting with the Company's Human Resources Department or Legal Department.

In Media Policy

Providing clear and accurate information to the media, investors, analysts, and the general public is essential for maintaining integrity in our relationships with the public. To uphold this commitment, the Company has a dedicated Corporate Communications function responsible for conveying Company positions on a range of issues. Effectively communicating our achievements and plans through the media to investors, customers, existing and potential, and the broader community in which we operate is crucial to realizing our vision.

This policy is not only significant for fostering and preserving effective relations with the media but also for legally safeguarding the information released to the media. In this context, it is imperative to ensure that all external communications to the media, analysts, investors, and the general public are conducted exclusively through our authorized representatives who are qualified to speak on identified subjects. We must refrain from manipulating or misrepresenting any facts related to our Company and make disclosures that are full, fair, accurate, timely, and understandable to regulators, government agencies, investors, and the public at large.

Consequently, any requests for financial or business information about the Company from the media, press, financial community, or the public should be directed to the Head of Corporate Communications. No communication with investment communities or the media, whether on or off the record, should occur without prior authorization from the Head of Corporate Communications.

It is critical that no one should independently respond to such inquiries or contacts since any inappropriate or inaccurate response, including denials or disclaimers of information, could lead to adverse publicity and potentially harm the Company's legal position. In the event, any sensitive Company information is inadvertently disclosed, Head of Corporate Communications must be promptly notified in this regard.

This policy does not pertain to requests for publicly available financial information, such as Annual and Quarterly Reports, or promotional publicity activities of the Company. Requests for interviews with any Company's individual regarding the Company or its affairs and the issuance of any Company's press releases must receive prior review and approval from the Head of Corporate Communications. Similarly, Company-initiated interviews must be approved by the CEO before they can be scheduled with the media.

Social Media

You must ensure that our internal and external communications are clear, truthful, transparent, courteous, and professional. When writing social media posts, it must be clearly indicated that they represent personal opinions and do not speak for or on behalf of the Company unless you have received permission to do so. Do not disclose confidential information about the Company, and never post anything that might constitute a threat, intimidation, harassment, or bullying.

Watch Outs

- Refrain from misrepresenting yourself or the Company or speaking on behalf of the Company.
- Never disclose personal information about employees, consumers, visitors, or online followers, or proprietary or confidential information about the Company or its business partners.
- Avoid posting information about a Company product or campaign before it is officially released.

- Refrain from taking pictures or videos in office workspaces, conference rooms, near laptops, or whiteboards that may lead to the leakage of confidential information by posting such content on social media without the Company's consent or knowledge.

Dress Code

- We recognize the growing popularity and positive effects of a relaxed workplace environment. The official dress code at EMAAR is Smart Casual, reinforcing a sense of informality, openness, and collaboration across all levels and functions.
- Employees are expected to maintain a standard of appearance appropriate to their work environment and responsibilities, adhering to any applicable uniform or dress policies.

Hygiene and Safety

All employees must maintain high standards of personal hygiene, food safety, and workplace safety at all times. Employees must ensure:

- Personal grooming is neat and professional.
- Uniforms and shoes are clean and in good condition.
- Hands are washed regularly, especially in operational areas.
- Safety gear is worn wherever required.
- Food handling practices align with hygiene standards.

Working Hours & Attendance

All employees must strictly adhere to the company's attendance requirements. For detailed guidelines on attendance, leave entitlements, and related procedures, please refer to the Leave Policy and Attendance Policy applicable to Emaar India.

Unauthorized Absence

Employees must adhere to scheduled work hours and obtain prior approval for any absences. The following actions are considered violations:

- Failing to report back on time from leave without prior approval from the manager.
- Being absent from the workplace without approval.

Adherence to Authority Limits

Employees must operate within the scope of their designated authority and comply with the company's authority matrix. The following is considered a violation:

- Making company decisions or commitments that exceed one's authorized limits as per the authority matrix.

Company records and reports must be reliable

The Company's business records are relied upon to produce reliable and accurate reports for management, shareholders, creditors, governmental entities, and others. Therefore, all official records of the Company's business conduct must be accurate, honest, and complete, without any restriction or qualification of any kind. This encompasses both factual documentation and ethical evaluation/appraisal.

We are committed to generating, maintaining, archiving, and destroying business records and results of operations and financial position in compliance with applicable regulatory requirements and generally accepted accounting principles. Our commitment to accurate reporting in the Company's books and records reflects our integrity in conducting business.

It is our policy and a legal requirement to maintain books, records, and accounts that accurately and fairly reflect business transactions and the disposition of Company assets as per Applicable Law.

Our shareholders rely on us to act with integrity, and the law obligates us to report our financial information accurately. We are committed to complying with the applicable legal and regulatory requirements by ensuring full, fair, accurate, and timely disclosures, including financial reporting, in our public communications and reports submitted to regulatory authorities. We believe that everyone must act as an owner and be accountable for the accuracy and honesty of the business records, contracts, and agreements that we handle in the normal course of business.

Every accounting or financial entry should precisely reflect the supporting information. There must be no concealment of information from management or from the Company's internal or independent auditors. No payment on behalf of the Company should be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described in the documents supporting the payment. No false, inaccurate, or misleading entries should be made in any books or records of the Company for any reason, and no fund, asset, or account of the Company may be established, acquired, or maintained for any purpose unless it is accurately and properly reflected in the books and records of the Company.

No corporate funds or assets should be used for any unlawful or improper purpose. Managers and others responsible for the preparation of financial information should ensure that the Company's corporate financial policies are followed. Revenue and expenses should be properly recognized on a timely basis, and assets and liabilities should be properly recorded and appropriately valued. Those involved in the Company's filings with regulatory authorities or other communications with the business or financial community should ensure that those filings and communications contain disclosure that is full, fair, accurate, timely, and understandable.

We must conduct all our business activities with honesty and in accordance with the highest moral and ethical standards. Never falsify, omit, misstate, alter, or conceal any information, or otherwise misrepresent the facts on a company record or encourage or allow anyone else to do so. Always authorize, execute, and record all transactions properly, irrespective of the monetary value.

We must exercise honesty in properly disclosing and reporting all business activities and transactions, including but not limited to payments for:

- Travel and entertainment expenses
- Relocation and housing reimbursements
- Employee compensation
- Customer or supplier/vendor payments

Watch Out

- Intentionally creating false documents and records is illegal.
- Comply with our Code and retain all business records, whether in paper or electronic form, only as long as necessary for a legitimate business purpose or as legally required.
- Be thoughtful about the amount of data you collect and how long you keep it.
- Do not misstate financial information in our company's books and records.
- Do not accelerate or defer costs in violation of accounting principles or inflate or deflate quarterly or annual sales.
- Authorize, execute, and record all transactions properly, regardless of the monetary value.

- Do not alter site numbers to meet productivity goals.

The Company, its stakeholders, and management must have adequate assurance that the information in books and records, including financial and other business records, as well as personnel and benefit-related forms that employees may complete, is accurate and complete. If you come across any inaccuracy in Company's records or a failure to follow our internal control processes, speak up and report it immediately to your line manager or Human Resource Department or Compliance Officer.

Personal Information

Employees are required to inform the HR Team of any changes in their personal information, such as, telephone and personal email contact details, residence addresses, marital status, dependent information, and contact details within 30 days.

Use of Company Assets

We believe that the tangible and intangible assets of the Company serve to help our employees achieve the Company's business objectives. Company equipment, systems, facilities, corporate credit cards, and supplies must be used solely for conducting the Company's business or for purposes authorized by management. We must exercise prudence when utilizing Company assets, including Company premises, financial resources, work facilities, equipment, movable assets, communication systems, IT systems, data, and intellectual property. It is our responsibility to remain vigilant regarding situations or incidents that could lead to the loss, misuse, or theft of Company property, and to promptly report any such situations to our manager.

We shall avoid inappropriate use of our assets and resources, as activities like theft, misappropriation, and unauthorized use of money, property, or services are strictly prohibited. We must ensure that any limited personal use of Company assets does not result in unreasonable costs, does not interfere with work responsibilities, and is only for lawful, proper, and authorized purposes. It is crucial that we do not use the information and communication systems of the Company in a manner detrimental to the Company or any of our colleagues. Additionally, we must not damage or get involved in misappropriation or embezzlement of our assets of any kind or mishandle or misuse our assets for personal or unauthorized purposes.

We are personally responsible not only for protecting the Company's property entrusted to us but also for helping protect the Company's assets in general. Only certain senior employees have the authority to make commitments affecting the Company's assets. We must not make commitments affecting the Company's assets unless properly authorized.

When the Company agrees that an employee may remove Company property, materials, or any other item, an approval signed by an authorized Company officer must be obtained. The authorization must be presented to security when leaving the premises.

Indicative List of Company Assets

- Building and facilities
- Vehicles
- Equipment and Tools
- Business partner's information
- Software
- Business records
- Stationery and other business supplies
- Employee information
- Office computers and communication equipment

Use of Vehicles and Parking Regulations

Employees must use company vehicles strictly for authorized business purposes and not for personal transportation. Those operating a company vehicle must have a valid driver's license, comply with all traffic laws, and drive safely. Any traffic fines imposed on the company due to an employee's actions will be charged to the employee. Operating a company vehicle under the influence of drugs or alcohol, or in an unsafe or negligent manner, will result in immediate termination.

Additionally, employees must park vehicles—whether company-owned or personal—only in designated parking spaces within the workplace premises. Parking in unauthorized areas, including spaces assigned to others or no-parking zones, is strictly prohibited and may lead to disciplinary action.

Use of Information Technology Resources & Information Security

Company computer systems and other technical resources are restricted to authorized users for legitimate and authorized business purposes. The actual or attempted unauthorized access, use, modification, or copying of computer systems and other technical resources and information is a violation of Company policy.

As authorized users of the Company's systems, we must keep access codes such as passwords or two-factor authentication codes in a secure place and refrain from sharing them with others, ensuring their confidentiality. Additionally, we must sign off the system when leaving the area of the terminal or computer where we were working. It is also essential to use screen saver passwords and individual file passwords for confidential data. The use of email and Internet access on Company systems and equipment, or for any Company business, shall adhere to the Company's policies and procedures.

Illegally copying Company-purchased software is strictly prohibited. Employees shall not use copied software on Company equipment or for Company purposes unless permitted by the licensing agreement. Where local area networks exist, purchased software shall only be used in accordance with the terms of the licensing agreements.

Company resources include all computer equipment and other technical resources owned, leased, or rented by the Company, regardless of the physical location. This includes, but is not limited to, personal computers, portable computer devices, network servers, access to the Internet, Company Intranet, and e-mail access devices. This also includes voice mail and other voice systems, fax machines, and information obtained or downloaded from and/or disseminated through the Internet and Company Intranet. "Information Technology Resources" also includes access to the Company's network and e-mail from a computer not owned, leased, or rented by the Company (e.g., home computers).

Company resources should only be used for Company business purposes. The following uses are prohibited:

- Harassing, discriminating, offensive, defamatory, disruptive, fraudulent, or threatening messages, including those that offensively address race, sex, age, sexual orientation, religion, political beliefs, national origin, disability, veteran status, or any other characteristic protected by law.
- Unauthorized distribution of proprietary, confidential, or trade secret information.
- Causing or permitting security breaches or disruptions of network communication, circumventing user authentication or security of any computer, network, application, or other technology, and/or revealing your password to others or allowing others to use your password.
- Violations of the rights of any person or company protected by copyright, trade secret, patent, or other intellectual property rights, or similar laws or regulations.
- Unauthorized solicitation for commercial ventures, for religious or political causes, or for any outside organizations, or for any unauthorized personal gain or advancement.

The Company reserves the right to monitor equipment, systems, and network activities, including, but not limited to, e-mail, voice mail, Internet usage, and any stored information, in appropriate circumstances and pursuant to applicable laws. Additionally, for operations maintenance, security, business, legal, or regulatory requirements, authorized personnel and third-party service providers may have unrestricted access to information in the Company Information Technology Resources to the fullest extent permitted by law.

Employees must comply with the following rules:

- Staff must not use the internet to access unauthorized, inappropriate, or offensive websites, chat rooms, sports pages, or conduct online shopping activities, or download unauthorized applications (e.g., Dropbox, WeTransfer, etc.).
- The internet shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior Management approval.
- Downloads of files from unknown or unauthorized sites are not allowed.
- In case of an attack by a virus/malicious program is suspected, the IT Help Desk must be informed immediately.
- Employees enjoy private and confidential use of the system while performing their duties. However, the company reserves the right to monitor, access, retrieve, delete, and manage the email system without the permission of any employee.
- Emails are business documents, and employees are reminded to be professional and courteous in their communications.
- Employees are not authorized to retrieve or read any email messages that are not sent to them.
- Employees must not open or access attachments or messages that have unusual or unknown file extensions, even from known sources, because they may contain viruses.
- Company's policies against bullying, discrimination, or harassment apply fully to the Email system, so any violation of those policies is grounds for disciplinary action.
- Employees may only use company-approved social media platforms during their course of work. They must avoid displaying information/comments regarding the company, any of its employees, or work-related matters on social media without appropriate approvals.
- Employees may not use the email system to solicit for commercial enterprises, outside organizations, religious causes, or other non-job-related solicitations.
- Inappropriate, obscene, derogatory, or offensive email messages received must be immediately deleted – they must not be printed or passed to other employees.
- Email messages sent to company's email addresses are not permitted to be forwarded to external email addresses (including but not limited to employees' personal email addresses) unless approved by the Head of HR and Head of IT.
- No long-distance personal calls may be made on company phones without prior approval from the employee's supervisor
- If an employee abuses the use of the Internet, access will be taken away. Employees must primarily use the main domain and not use the guest domain unless there is a dire necessity for work purposes. Employees who fail to comply may be subject to disciplinary action.

The Company reserves the right to terminate any user's access to the Company's Information Technology Resources at any time, with or without advance notice.

3. OUR RELATIONSHIP WITH OUTSIDE BUSINESS ENTITIES/THIRD PARTIES

Each of us is responsible for how we are perceived by suppliers/vendors and customers. It is essential that we maintain our reputation for honesty and fair dealing with these groups.

Conflict of Interest (Business Partners)

"Having a conflict of interest is typically not a code violation, but failing to disclose is."

Any employee having a personal, familial, or financial relationship with a vendor, business partner, or any party involved in a procurement or business decision must promptly disclose such relationship prior to the commencement of the evaluation or decision-making process. Disclosure of a conflict does not constitute disqualification; however, failure to disclose or deliberate concealment of such conflict shall constitute a disciplinary offence. All disclosed conflicts shall be escalated to the reporting manager and the CHRO, and the concerned employee shall be recused from the relevant evaluation, negotiation, or decision-making process, with appropriate documentation maintained in the record. In addition, all procurement-facing employees shall be required to sign a blanket annual disclosure form and update disclosures as and when any new conflict arises. Ethical Dealings with Suppliers/Vendors

The company's success depends on building productive relationships with our suppliers/vendors (including service providers) and customers based on integrity, ethical behavior and mutual trust.

Treating Suppliers/Vendors Appropriately

Our suppliers/vendors are valued partners in the success of our business. Our relationship with them must be characterized by honesty, fairness and transparency. Suppliers/vendors must be selected on a competitive basis based on a value proposition, which includes quality, service, technology, and price. Terms and conditions defining our relationships with suppliers/vendors should be communicated early in the vendor selection process, and agreements to such terms and conditions, or any acceptable modifications, must be reached before work begins. Decisions should be based on objective criteria such as price, quality, reliability and integrity. Employees must not accept any gifts, meals, travel, entertainment, or other items of value from any vendor or prospective vendor, except in strict compliance with Company policy; gifts above Rs. 1,000 in value are prohibited, and all gifts received, regardless of value, must be declared. No vendor-sponsored personal entertainment, including meals, travel, or events, shall be accepted without prior written approval from the CFO, and no vendor-sponsored international travel shall be accepted without prior approval from the CEO. Giving or receiving any kickbacks, bribes, or similar payments of any sort is prohibited. It is not acceptable to give or receive gifts to influence any business decision. We will only do business with suppliers/vendors that comply with local and other applicable legal requirements and any additional Company standards relating to labor, environment, health and safety, intellectual property rights, and proper payments. We will safeguard the Company's confidential and proprietary information with a confidentiality agreement and safeguard any suppliers/vendors provided information protected by any confidentiality agreement. We must safeguard Personal Data obtained from suppliers/vendors.

Watch Outs

Selection of suppliers/vendors on any basis other than open, competitive bidding.

Potential conflicts of interest in suppliers/vendors selection, including the acceptance of gifts or other items of value except in strict compliance with business guidelines.

Directing business to a suppliers /vendor owned or managed by a relative or close friend.

Hiding unsafe conditions in suppliers/vendors' facilities or allowing the hiring of workers who appear to be underage or subject to coercion.

Ignoring apparent disregard of environmental standards in suppliers/vendors' facilities.

In order to avoid any potential conflict of interest situation, under no circumstances should an employee avail the services of any Company empaneled vendors/contractors/service providers for personal use, even if they

are paying for such services. For any compelling reasons wherein, it is a must for the employee to solicit services of any Company empanelled Vendors/ contractors/ service providers, they should seek prior written approval from the Functional Head and CHRO, who may approve this as a deviation based on the merit of the case. The failure on the part of the employee to take such approval will be treated as a violation of the Code of Conduct, and the Company reserves the right to take suitable disciplinary action (including but not limited to termination) as deemed fit.

Any products/ services available to all employees at negotiated rates by Contracts & Procurement Team or any seasonal promotional activity of Emaar vendors/ contractors/ service providers wherein products/ services are being extended to all employees shall be excluded from this clause (e.g., Discounted rate products like AC/TV, etc., being offered by manufacturers to employees of the Company).

Any actual or suspected procurement wrongdoing must be reported in accordance with the Company's Whistleblowing Policy through the designated reporting channels. Employees may also escalate concerns to their reporting manager, CFO, CHRO, or CEO, as appropriate. Retaliation against a whistleblower is strictly prohibited and will itself constitute a disciplinary offence.

For 12 months after leaving Emaar India, an employee must not accept employment with, or provide services to, any vendor with whom the employee had a material procurement relationship during the last 24 months of employment.

This cooling-off obligation applies regardless of whether separation from the Company is voluntary or involuntary.

Any breach of this obligation may result in legal action by Emaar India.

4. OUR RELATIONSHIP WITH CUSTOMERS

Our reputation has been built upon the quality and service of our products. Our commitment to quality and safety is essential to the continued growth and success of our Company. We are committed to ensuring that customers can continue to trust our products for their reliability, quality, and superior performance. We must constantly strive to be efficient in every way possible so that our products are affordable to the greatest number of customers. Products sold by the Company must not only meet all safety standards set by law but also adhere to our more stringent Company standards.

Commitment to Quality:

"Quality is fundamental to our sustainable growth."

We are committed to supplying products and services of quality that meet all applicable standards. We succeed by competing with other businesses on the quality of our products and services. We follow good construction practices and testing protocols. Quality assurance is integral throughout the supply chain, from the purchase of ingredients to the delivery of the finished product to our consumers.

Responsiveness to our Customers

Our success depends upon customer satisfaction, trust, and goodwill. We can best achieve our objectives and serve the needs of customers by following a consistent, fair and sensitive program of customer communication. We must recognize the importance of anticipating and ensuring responsiveness to customer needs and preferences in our products. We also believe that customer opinions, concerns, and inquiries communicated to the Company regarding our products are vital sources of information and should be documented, shared, and used appropriately.

Customer needs are constantly evolving, so we must listen attentively to their preferences and employ our creativity to meet these changing needs. When a customer expresses dissatisfaction, we must promptly, courteously, and fairly address the issue, making every reasonable effort to regain the customer's goodwill and their continued purchase of Company products.

Accurate Advertisement

One of the most critical aspects of our business is advertising. Advertising should be creative and competitive while remaining honest and non-misleading. Our advertising must also avoid any stereotyping of individuals based on factors such as race, caste, religion, national origin, ethnic origin, color, gender, age, citizenship, sexual orientation, veteran status, marital status, or disability.

Advertising does more than create a product image; it shapes our reputation for reliability, dependability, and trustworthiness. Furthermore, we must exercise discretion in selecting the media in which our advertising messages appear. We should not permit our advertisements to appear on television programs or in other media that excessively use violence or sex or are antisocial or in poor taste.

We must adhere to standards of commercial fairness as well as abiding by the applicable law when creating, using, and selecting advertising and trademarks. This ensures that our products succeed based on their own quality and our reputation rather than through imitation or trading on the goodwill of competitors.

Customer Privacy

We must foster an environment of knowledge, confidence, and trust that encourages customers to freely exchange information with the Company. This environment enables us to better understand and meet their needs while reflecting our stewardship of their data. We are committed to protect the privacy of personal information, treat information provided by an individual as that individual's property entrusted to the Company.

We must inform people about the use and handling of the data they provide to us, including informing customers about the information we collect, what we do with it, and the choices customers have concerning further uses of the information. We use such information only for the purposes for which it was supplied to us unless a customer consents to other uses, and as necessary for our record-keeping and research purposes. All data is subject to our Data Protection and Privacy Policy and applicable laws.

5. OUR RELATIONSHIP WITH GOVERNMENT AND THE LAW

It is imperative that we adhere to all laws that regulate our business. Furthermore, it is our policy to not only comply with the letter of the law but also with its spirit. In case of any uncertainty, we encourage you to consult with the Human Resources Department and the Legal Department.

Compliance with Competition Laws & Fair Competition

We are dedicated to treating competitors appropriately. The Company's objective is to attract customers to its products based on their quality and value, rather than by unfairly disadvantaging our competitors. We are committed to conducting business in a manner that aligns with relevant antitrust and competition laws. Our principles are founded on the concepts of fairness, ethics, and transparency in all our interactions with competitors, suppliers, and customers, as we all prosper in an environment of open and equitable competition.

We strongly advocate for free and fair competition and strictly oppose engaging in practices that could lead to market monopolies or the formation of cartels with fellow competitors. We refrain from participating in activities that encourage monopolistic market positions, dominance, cartels, and other unfair trade practices. Our marketing of products and services is based solely on their merits, and we do not make unjust or misleading claims about our competitors' products and services. We obtain competitive information through legitimate public or lawful sources and means.

Specifically -

- We shall not engage in discussions about subjects such as prices, pricing strategies, product or marketing plans, or terms of sale with competitors. Should such prohibited topics arise during trade association or other meetings, it is essential that we promptly exit the meeting and inform our leadership or the Human Resources Department.
- We shall not bundle the purchase of one product with another or coerce suppliers/vendors into buying from us to maintain their business relationship with us.
- We shall not make derogatory remarks about a competitor's products or services.
- We shall collect competitive information only through proper public or other lawful channels, refraining from using information obtained illegally or improperly by others, including misrepresentation, invasion of property or privacy, or coercion.

Commitment towards Anti-Bribery:

We are committed to complying with all applicable laws regarding the prevention of bribery and corruption. We conduct our business in an honest and ethical manner, maintaining the integrity of our business dealings with both private and public parties. We have zero tolerance for any form of corrupt practices in relation to our business worldwide.

Watch Out

- Understand how to identify and avoid all forms of corruption.
- Ensure that no person, suppliers, or companies working on the Company's behalf may not offer, give, or receive a bribe.
- Ensure that you do not accept or offer anything of value to business partners or government officials that might affect your objectivity in performing your job.
- Disclose any gifts received from business partners to the Company.

- Immediately report allegations of bribery or attempted bribery directly to the Compliance Officer or Human Resources Department.

Compliance with Anti-Money Laundering Laws

Money laundering is the process by which individuals or groups attempt to conceal the proceeds of illegal activities or make the sources of their illegal funds appear legitimate. We must strictly adhere to stringent policies to ensure that we are not involved in any money laundering practices. Accordingly, we must comply with the following requirements:

- Review and accurately capture business partner information where applicable.
- Report immediately if a transaction appears suspicious or if the business partner seems to be a potential fraud victim.
- Report any concerns about payments or transactions while conducting business with any parties or if you suspect any involvement in money laundering activity.

The following are certain money-laundering red flags that needs to be watched out for and immediately reported:

- (i) A request is made to deal in currencies other than those specified in the relevant agreement or invoices.
- (ii) A request is made to or from countries with no relation to the relevant agreement or invoices.
- (iii) A request is made for payment in cash for large amounts of money.
- (iv) A request involves third parties or intermediaries with no apparent role in the transaction.
- (v) Third parties show an unwillingness to provide identification documents, or such information is incomplete, incorrect, or misleading, such as a false address.
- (vi) The third-party refuses or is unable to identify a legitimate source of its funds.

Political Activities

We are committed to supporting a functioning democratic constitution and system with a transparent and fair electoral system in India. We engage ethically and responsibly with elected officials to advance the Company's mission and protect the rights of those we empower. We will not support any specific political party or candidate for political office, directly or indirectly. The company shall not offer or give any company funds or property as donations, directly or indirectly, to any specific political party, candidate, or campaign. Any political contribution and/or affiliation, monetary or non-monetary, shall strictly be done in a personal capacity without involving any conflict with the Company's interests.

We do not permit the use of any Company facilities or resources by employees for political campaigning, political fundraising, or partisan political purposes. A decision by an employee to contribute any personal time, money, or other resources to a political campaign or political activity must be entirely voluntary. When communicating views or taking actions toward any political party or situation, the expressed views or opinions should clearly be stated as personal and not those of the Company.

Watch Out

- Do not engage political activities in personal capacity during working hours or using Company assets.
- Refrain from using Company funds or resources; receive reimbursement to support political activities in your personal capacity.

Interaction with Regulatory Bodies and Government Officials

We engage ethically and responsibly with regulatory bodies and government officials. We encourage our interaction with government officials to be conducted through authorized and appropriately trained individuals, following Company policies and processes.

We believe that interacting with government officials or regulatory bodies, including requests for government inspections, investigations, or information, should be fully cooperated with and fulfilled in compliance with regulatory requirements, with prior approval from authorized individuals within the Company. We prohibit improper payments to government officials. Improper payments are direct or indirect payments, whether in cash or in other things of value (such as lavish entertainment), to a government official or political party to influence acts or decisions, receive special treatment or personal gain, or obtain or retain business. The Company and its employees shall not offer or give any company funds or property as a donation to any government agencies or their representatives, directly or through intermediaries, to obtain favorable performance of official duties. Employees must inform the Legal Division/ HR immediately upon obtaining any knowledge or information regarding such payments, and any payments must be reported to the appropriate Company Tax personnel. All employees must comply with local laws concerning bribery and the prevention of corruption. We do not seek to influence any government employee's judgment or conduct by promising gifts or loans or any other unlawful inducement.

Watch Out

- Obtain requisite approvals within the Company before your official interaction with government entities.
- Comply with the Company's relevant policies, procedures, and applicable regulatory requirements.
- Communicate transparently with government officials and respond to their inquiries in a timely and truthful manner, with prior approvals.

Accepting or Giving Gifts (Improper Payments)

An improper payment to gain an advantage in any situation is not only unacceptable but also illegal, and exposes us and the Company to criminal prosecution. The Company expressly prohibits improper payments in all business dealings, with both government and private sector. Improper payments should not be confused with reasonable and limited expenditures for gifts, business entertainment, and customer travel and living expenses directly related to the promotion of products or services or the execution of a contract. Improper payments do not include occasional business meals, which can be reciprocated, or gifts of purely nominal value. These payments are acceptable, subject to specific guidelines. Before giving a gift, engaging in customer entertainment, or reimbursing customer travel expenses, we must make sure we understand applicable legal requirements, the customer's own rules, and business guidelines. Make sure records of such expenditures accurately reflect the true nature of the transaction.

Never offer business courtesy, such as a gift, contribution, or entertainment, under circumstances that might create the appearance of impropriety. Never offer, promise, pay, or authorize anything of value (such as money, goods, or services) to a government official or an employee of the customer to obtain or retain an improper advantage. Never give a gratuity or other payment to government officials or employees to expedite a routine administrative action without consulting with the Company National Executive. If such a "facilitating payment" is made, make sure it is clearly and accurately reflected in financial reports.

Never contribute company funds or other company assets for political purposes. Do not accept or allow a close family member to accept gifts, loans, or preferential treatment from anyone doing business with the Company.

Gifts of modest value or customary activities include a modest form of hospitality for business. The gifts that violate our Code should not be accepted unless they are impractical or offensive (e.g., for local cultural reasons). Only professionally appropriate gifts (i.e., no cash or gift cards), when given infrequently, shall be acceptable. Employees receiving a gift (or other personal benefit) must report the fact in writing to their manager. The

manager will escalate the matter to the HR Team, who will advise the employee whether the gift may be accepted, returned to the donor, or disposed of in some other way. In making that decision, cultural considerations must be taken into account, as it may be offensive to return gifts. If it is decided that the gift may be accepted, the recipient should send a brief letter of acknowledgment to the donor. If returning the gift would offend the donor, then it should be submitted to the Company for some charitable cause as dictated by the CEO, India.

Compliance with Global Trade Laws

We are committed to complying with global trade laws, including regulations related to import, export, and sanctions. We conduct our business in compliance with trade laws across jurisdictions and applicable local regulations. We adhere to all applicable transit and intellectual property norms while trading our goods across the globe.

Watch Outs

It is our responsibility at work to:

- Comply with all applicable global trade laws and regulations, including those relating to the import and export of goods, services, and technical data to and from countries.
- Raise a concern with the Compliance Officer or Human Resources Department if you believe there may be an inappropriate import or export of goods, technical data, or hardware.
- Coordinate with the Compliance Officer or Human Resources Department when international government representatives request information or documents in the Company's possession.

Enforceability of Local Law

Where an employee becomes involved in legal proceedings that may impact their employment, the employee must promptly inform their manager and fully disclose relevant details. The manager must then immediately report the incident to their next reporting line and the HR Team.

During the period of legal proceedings, the company reserves the right to temporarily suspend the employee from work without pay until the matter is resolved.

Where an employee is convicted of a crime and a final judgment is issued against them with a freedom-restricting penalty, the company reserves the right to terminate their employment.

Record Preservation

We will comply with all laws and regulations related to record preservation. The purpose of this code is to articulate and convey the Company's business and legal requirements for managing records, encompassing all recorded information, regardless of the medium or characteristics. Records may include paper documents, CDs, computer hard disks, emails, floppy disks, microfiche, microfilm, or any other storage media. The Company and its employees are obligated by applicable laws, rules, and regulations to retain specific records and adhere to precise guidelines in managing these records. Failure to comply with such guidelines may result in disciplinary action, including potential termination of employment or business relationships, at the Company's sole discretion.

Data Privacy and Confidentiality

The Company places a high value on the privacy of all individuals, including personal data of employees and consumers. We believe that data privacy is essential for maintaining our competitive advantage, developing new products and markets, and safeguarding valuable assets for future growth. We consistently implement

reasonable and necessary precautions to protect Company information. We expect you to ensure the protection of the Company's information unless you have clear indications that the Company has publicly released the information. We encourage you to promptly report any suspected security-related incidents, data breaches, or situations in which data has been compromised to your manager, Compliance Officer, or Human Resources Department.

Working with Local and National Governments

Our policy is to collaborate with local and national governments. Occasionally, issues may arise that impact our operations. After careful consideration, the Company will provide opinions and recommendations to governments on these issues to support our business goals and needs.

6. OUR RELATIONSHIP WITH SOCIETY

The Company is committed to being a responsible member of the national and global community. We consider ourselves citizens in every location where we conduct business, and, just like individual citizens, we have a civic duty to contribute to the well-being of the community through support for health, education, and social welfare.

Pay it Forward

The Company and its employees are dedicated to being exemplary citizens and good neighbors in all the regions where we operate worldwide. We believe it is our societal responsibility to use our resources - whether financial, human, or energy-related - judiciously. We consistently endeavor to have a positive impact on the lives of our business partners, stakeholders, the community, and the environment at large. We are steadfast in our commitment to driving our Corporate Social Responsibility (CSR) initiatives with the same level of rigor and dedication as we apply to our day-to-day business operations. We respect, learn from, and actively support the communities and cultures with which we engage.

Our CSR efforts are focused on the following key areas:

- Addressing basic needs related to health, education, social services, culture, civil society, environment, and infrastructure.
- Providing solar lighting and access to clean energy solutions.
- Implementing water harvesting projects for various rural purposes.
- Empowering unemployed youth by developing their skills and transforming them into a skilled workforce.
- Enhancing overall income through the creation of livelihood opportunities.

Opposition to Exploitative and Inhumane Labor Practices

We strongly condemn the use of child labor, the exploitation of children, and any form of inhumane treatment of workers. Furthermore, it is our company's policy not to engage with suppliers, vendors, or contractors known to operate with unacceptable labor practices such as child exploitation, physical punishment, mistreatment of women, involuntary servitude, or any other form of abuse. The Company unequivocally condemns any abuse of child labor or other labor violations. If any breach of our principles becomes known to the Company, it will be grounds for the immediate termination of the business relationship.

Child Protection

Employees are expected to be aware of the importance of child protection in order to help prevent children who visit EMAAR establishments from all forms of abuse, exploitation or negligence. Where an employee, customer or client is suspected of any type of child abuse, the concern / allegation about an actual or suspected situation should be escalated immediately to HR.

Commitment to Universal Human Rights

We offer an unwavering commitment to universal human rights, especially those of our employees, the communities in which we operate, and the parties with whom we do business. We fully endorse and respect the protection of internationally recognized human rights principles. We acknowledge the significance of upholding and promoting fundamental human rights throughout our operations and supply chain. We are dedicated to respecting the rights of workers across our value chain.

In pursuit of this commitment, we will collaborate with business partners who uphold the following standards:

- Equal opportunity for employees at all levels, without discrimination based on race, caste, color, religion, gender, age, national origin, citizenship, sexual orientation, or disability.

- Ensuring a safe and healthy workplace that safeguards human health and the environment.

Working with Governments and Communities for the Betterment of Society

We actively engage with governments and communities to enhance educational, cultural, economic, and social well-being. We maintain a zero-tolerance policy for any human rights violations within our business, supply chain, or partnerships.

Commitment to Protecting Life and Property

We are committed to safeguarding the lives and property of our employees and the members of the communities in which we operate. Any issue related to crises involving the environment, our products, or the life, health, or safety of Company employees or others should be immediately reported to the Human Resources Department.

Watch Out

It is our responsibility to:

- Provide humane and safe working conditions, including safe housing conditions where applicable.
- Ensure fair and equitable wages, benefits, and other employment conditions in compliance with local laws.

7. OUR RELATIONSHIP WITH THE ENVIRONMENT, HEALTH & SAFETY

Protecting the world in which we live is a vital concern and a continuing commitment. As a company dedicated to contributing to the overall quality of life, we recognize and constantly reaffirm the value of a healthy and clean environment.

We acknowledge the importance of effectively managing environmental, health, and safety matters as integral components of our business activities. We are committed to safeguarding the environment, health, and safety (EHS) of our employees, contractors, consumers, and communities.

Our Environmental Pledge

It is our policy to:

1. Ensure that our operations are safe for employees, neighbors, and the environment surrounding our sites.
2. Reduce or prevent adverse environmental impacts resulting from our operations.
3. Provide customers with relevant information about the environmental impacts associated with our sites.
4. Assess our environmental performance with a focus on continuous improvement.
5. Ensure that employees understand and are accountable for integrating environmental quality into their daily business activities.
6. Meet or exceed the requirements of all applicable laws and regulations and adhere to relevant environmental laws and policies.
7. Properly handle hazardous items and appropriately transport, manage, and dispose of them when not in use.
8. Ensure compliance with hazardous materials and hazardous waste regulations.
9. Act as responsible stewards and insist that work be performed safely with minimal impact on the environment, regardless of your job and role.
10. Reject unsafe or harmful work environments that may endanger you or others.

8. RESPONSIBILITY FOR COMPLIANCE

- All employees are accountable for compliance with this Code.
- The Human Resources Department is responsible for communicating these standards to those with whom they work, ensuring their understanding and compliance, and fostering an environment where ethical and legal issues can be openly discussed.
- This Code may not provide definitive answers to all questions.
- This Code is our collective responsibility.
- Incorporate the Code into your daily business practices.
- Fulfill your obligation to maintain ethical and compliant behavior at all times.
- Cooperate fully and honestly in all investigations involving integrity, ethics, or policy violations.
- Whenever in doubt, seek guidance from your Human Resources SPOC (Single Point of Contact).
- Report suspected or potential violations.
- Failure of any Company employee, or officer to comply with this Code, or to make appropriate disclosures and receive proper approval for a waiver of any provision, may result in disciplinary action, including termination.

Exceptions to our Code of Conduct

Any exception to this Code requires prior written approval from the Chief Executive Officer, Chief Financial Officer and Chief Human Resource Officer. If required by applicable law, exceptions will be promptly disclosed.

Custodians of The Code

The Human Resources Department, in conjunction with the Legal Department, will serve as the custodian of this Code of Conduct.

Contact

For voicing any concern, you have about compliance with the law, this Code, and our policies, please use the following contact information:

Postal Address: Emaar Business Park, MG Road, Sikanderpur, Sector 28, Gurugram – 122002, Haryana.

Email: teamhr@emaar.ae

Note: Emaar India reserves its right to interpret, modify, suspend, or withdraw any policies, procedures, rules, protocols or guidelines, with or without notice, at its sole discretion.

Frequently Asked Questions (FAQs)

1. The Company raises the bar for performance each year, and we always seem to be under pressure to achieve better results. Should we prioritize our obligations to meet business and financial goals over our obligations in this Code?

Answer: We place a high value on both achieving business and financial goals and upholding our Code. These two aspects are not mutually exclusive; rather, they are complementary, and our interests are never served by unlawful or unethical business conduct. We are one of the reputed global brands, and maintaining the highest ethical and professional standards is critical to maintaining this valuable trust.

2. What should I do if my manager asks me to perform a task that I believe might violate our Code or a law?

Answer: Raise your concerns openly and honestly with your manager. If you are not satisfied with your manager's response, or if you feel uncomfortable speaking to your manager, raise your concern(s)/complaint(s) to Human Resource Department or Compliance Officer. You should never knowingly violate our Code, any of our policies, or a law, even if your manager directs you to do so.

3. I operate mixer machinery at Emaar's site, but recently I haven't been well and taking medication dosage. I don't feel safe and comfortable to operate, but my line manager said not to worry about it. What should I do?

Answer: Working under the influence of medication or over-the-counter drugs may impair your work performance. Immediately contact Human Resource Department for guidance and help.

4. I have been assigned the task of organizing an office event in a state where the use of alcohol is prohibited by the government but one of the event suppliers has proposed that he can make it work. What should be my course of action?

Answer: The Company is always committed to the laws and regulations set by the Government. Breaching the law will be a violation of our code. When in doubt, always reach out to the Compliance Officer or Human Resource Department.

5. "My spouse has started working for a competitor in the same department where I work at the Company. Should I disclose this information to my line manager or Human Resource Department?"

Answer: Yes, disclosure of such information will enable us to better manage confidential and sensitive information. Failure to disclose such information may not be in the best interests of the Company. When in doubt, please reach out to your line manager, Compliance Officer or Human Resource Department.

6. "One of my dealers has offered me a luxurious vacation plan to Udaipur. He's one of the largest dealers of Emaar and has not sought any immediate favor from me. Should I accept the offer given our strong relationship to avoid offending him?"

Answer: You must not accept any unreasonable hospitalities from channel partners even if it is without any immediate favor from them.

7. I'm preparing a presentation for a customer and found music and video clips on the internet. Can I include these in my presentation?

Answer: It depends. The music and videos may be copyrighted. Check with your Company's Legal Department, Compliance Officer and Human Resource Department before using them in your presentation.

8. I read a negative article in a newspaper that contains incorrect information impacting the Company's reputation. I am deeply concerned and have considered responding to the news agency with all the relevant facts and statistics on behalf of Emaar. Should I proceed with this action?

Answer: No. Unless you are a designated person authorized to release external communications, you should refrain from communicating any opinions, facts, statistics, or any information on behalf of the Company. Instead, you need to approach Head of Corporate Communications and highlight about the same and provide all the correct information and necessary documents in this regard.

9. I am part of the new product development team. I am excited that our efforts have paid off well, and we are finally launching a new product next week. Can I post this on my personal social media account, tagging the Company account?

Answer: No. This is sensitive Company information, and its leakage may jeopardize the Company's competitive advantage. Even if you tag the Company account, this could significantly impact the Company's interests. We must refrain from sharing any such sensitive Company's information on social media.

10. My colleague told me to adjust our financial balance for the current month so that "good months" can offset "bad months." Is this a problem?

Answer: Yes. Altering our accounting records in this manner is dishonest and could have serious consequences for both the individual and the Company. Report this immediately to your line manager or Human Resource Department or Compliance Officer.

11. "I am taking a vacation where I want to completely disconnect. Is it okay if I leave my laptop with my colleague to handle any approvals on my behalf? I trust this person completely, so I don't mind sharing my password."

Answer: No. You should never give your personal password to anyone. If you do so, you are undermining the security of the Company, avoiding your own responsibilities, and putting your colleague in a position of also violating our Code.

12. My family has an ownership interest in a growing distribution company. I'd like to authorize the use of this distributor for Emaar's business because I can get us a very good deal. If I tell my manager about my family's interest in the business, is it allowable to hire the distribution company?

Answer: It is allowable to introduce the distributor to our business. You must fully disclose your family's and your own relationships to the distributor and then excuse yourself from the decision-making process and management of the project.

13. I am performing quality control tests for an undisclosed project. I received test results that are below standard, but I know that reporting this could cause a delay in the project. Should I consider manually adjusting the results in my report to the manager to avoid a delay?

Answer: Do not adjust the test results. Doing so would entail submitting a falsified report to Emaar's management, which could result in severe consequences for you and Emaar.

14. While attending an annual meeting event, a competitor revealed to me that he was frustrated with his company's new pricing changes and shared detailed plans to inflate prices across the organization. How should I respond?

Answer: You must not utilize this information in any way. It is vital that you adhere to our clear guidelines regarding such interactions. You should inform him that he should not be disclosing confidential information about his company to you. Whenever possible, you should also notify the Compliance Officer or Human Resource Department. This conversation could give the appearance of violating antitrust laws, potentially leading to significant legal repercussions for both you and the Company.

15. One of Emaar's vendors consistently sends me expensive gifts during non-holiday seasons. Can I accept them?

Answer: No, any gifts received should be of limited value, and you should not receive them frequently. If you feel obligated or influenced by them, it may be considered bribery. In such cases, you should refuse them and consult with your Compliance Officer when in doubt.

16. A government inspector from the MOEF has sent an assessment report highlighting serious accusations and lapses by the Company, requesting a prompt clarification. Should I quickly respond to the accusation with all the facts to safeguard the Company?

Answer: The Company appreciates your intention to safeguard its reputation; however, please obtain prior approval from the Legal Department and your designated line manager before sending any official response to government officials on behalf of the Company.

17. I recently got in touch with a supplier who can assist the Company in importing materials from a country where it has been particularly difficult to become established and obtain necessary government permits. May I engage the supplier agent on behalf of our company?

Answer: Before you engage with this supplier, consult with your Compliance Officer or Human Resource Department to ensure that the supplier is reputable and that its business methods are aligned with both local and Indian laws. Due diligence on this supplier's reputation is critical because the company could be legally liable for the acts

18. What is personal information, or Personally Identifiable Information (PII)?

Answer: Personal information, or Personally Identifiable Information (PII), refers to any information that can be used directly or indirectly to identify an individual, including past and present Emaar employees, suppliers of Emaar products or services, and their dependents, regardless of how or from where the information was collected.

19. A colleague who works for another company has requested the names of some of my business contacts. Their company does not compete with ours. Is it permissible to share this information with them?

Answer: Business contact information is not only confidential but is also considered personal data as it can be used to identify individuals. It should not be shared with anyone except as required or with the explicit permission of the business contact.

20. I have a work order that specifically outlines a task to be performed. As I began to do the task, I discovered that conditions were different from those expected when the job was planned. I have a feeling that continuing the job will be unsafe. What should I do?

Answer: You, as an employee, have the responsibility and authority to stop or refrain from commencing work that you believe may be unsafe. You should promptly communicate your concerns to your supervisor or line manager. Your supervisor or line manager has the responsibility to thoroughly investigate, understand, and resolve the issue.

ANNEXURE I

Annual Acknowledgment and Certification of Compliance with the Code of Conduct

This is to acknowledge that I have read the Code. I have been complying with the Code and all applicable principles. I further acknowledge that it is my responsibility to understand and follow this Code and I have been adhering to the ethical principles outlined in the Code. I agree that I have been following the values of the Company in all that I do and would continue to comply with the Code.

I will report any potential violation, of which I become aware, promptly to Company's Compliance Officer or Human Resource Department. I understand that the Company maintains a policy of non-retaliation for reports made in good faith.

- ☐ I have read and understood the Code.
- ☐ I have been complying with the Code.
- ☐ I acknowledge that I have understood and have been following received Code and adhering to the ethical principles outlined in the Code.
- ☐ In case of query/complaint, I shall consult the Company's Compliance Officer or Human Resource Department.
- ☐ I have never retaliated, threatened or intimidated anyone who, in compliance with his or her responsibility, reports any violation to this Code.
- ☐ I acknowledge and agree that my obligations under this Code, including the obligation to disclose and obtain prior written permission before joining any Business Partner of the Company, shall survive the termination of my employment for a period of twelve (12) months, and I undertake to comply with these obligations in full.

Employee Name

Signature

Employee ID

Date