



A subsidiary of [Gulf Extrusion LLC](#)

Plot A3 (18A), KIZAD, P.O. Box 137330 Abu Dhabi, United Arab Emirates.

# Compliance Code of Conduct (CoC)

Gulf Extrusion Automotive and Industries

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**Designation**

**Prepared By**  
QHSE Manager

**Approved by**  
Operations Director

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## 1 Introduction

Gulf Extrusion Automotive and Industries L.L.C – S.P.C, formerly known as Automotive Precision Technology (APT) is an Abu Dhabi-based aluminium parts manufacturing subsidiary fully owned by Al Ghurair Group, a United Arab Emirates (UAE) headquartered conglomerate.

With over 20 years of experience and formerly called REFCO Metals, our origins are from the acquisition of British company Sport Carrier Ltd (founded in 1997), itself a UK-based aluminium alloy extrusion fabrication and surface treatment specialist, supplying the automotive trade.

Gulf Extrusion Automotive and Industries L.L.C – S.P.C (GEX AUTO) 2021 purpose-built manufacturing facility of 98,000 Sq. ft is situated in KEZAD, Abu Dhabi, UAE. The original REFCO Metals Dubai plant in Jebel Ali was the first of its kind in the UAE. At our core, we process automotive-grade aluminium alloy extrusions from billet to finished component (made to customer specification), using various state-of-the-art production processes, technologies and techniques.

Our primary billets originate from the UAE-based Emirates Global Aluminium (EGA), as an external supplier to our in-group extruder, Gulf Extrusions.

With strategically placed global warehousing and logistics facilities, Gulf Extrusion Automotive and Industries L.L.C – S.P.C (GEX AUTO) is well-positioned to supply the global market with ongoing production parts. Typical automotive end customers that utilise our products include many global OEMs across mainland Europe, UK, USA and the GCC.

Gulf Extrusion Automotive and Industries L.L.C – S.P.C is committed to ensuring that the highest ethical and professional standards are provided in all its activities. This Code of Conduct (the "Code of Conduct" or "the Code") is a statement of the Company's integrity and ethics and explains the way the Company conducts its business.

The company is also committed to creating a workplace that is free from harassment and discrimination; and where all employees are respected and provided with an environment that encourages good performance and conduct.

The Company's image, reputation and credibility is based on its commitment to ethical business practices. Employees and Directors must therefore always conduct themselves with the highest level of integrity and ethical standards. Compliance with all policies of the Company in addition to all applicable laws and regulations is the minimum standard which should be always adhered to. If a provision in the Code of Conduct conflicts with a law, the law prevails in all such cases.

For more details, visit to [www.gulfexauto.com](http://www.gulfexauto.com)

## 2 Application And Responsibility

The Code applies to every employee, officer and director of Gulf Extrusion Automotive and Industries L.L.C – S.P.C.

**Employees** are all individuals on full-time or part-time employment with the Company, with permanent, probationary, trainee, temporary or contractual appointment.

**Officers** are Employees as defined above, in senior management positions within the Company.

Collectively, the above will be referred to as Employees.

**Directors** are all individuals that are elected or appointed to oversee the activities of the Company. The Code is applicable to both executive and non-executive directors.

## 3 Lead By Example

While all Employees and Directors are expected to act with integrity and honesty, Senior Management have the increased responsibility to lead by example and serve as role models for everyone within the Company. The Company relies on its leaders in promulgating the values defined in the Code by encouraging ethical behaviour and by ensuring all persons reporting to them observe the Company's core values. The Company's leaders must ensure that Employees on their teams are equipped to comply with the Code of Conduct laws, regulations, and policies, as well as the necessary resources to resolve ethical dilemmas. The Company's managers must maintain a culture which promotes the highest standards of ethical behaviour and compliance and must encourage all Employees to communicate their concerns as and when they arise. Employees and Directors must never sacrifice ethical and compliant behaviour in the pursuit of business objectives.

## 4 Seeking Guidance

By its very nature, the Code cannot cover all possible situations which Employees and Directors may encounter during their affiliation with the Company. The circumstances contained herein, although not comprehensive, are intended as a guideline to cover situations which might be encountered. If a situation arises that is not covered hereunder, or in case of any doubt, it is expected that Employees use good judgment to hold themselves to the highest standard and/or seek guidance from Senior Management or from the Human Resource Department.

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## **5 Whistleblower & Reporting Concerns**

This Code of Conduct is designed to enable Employees of the Company to raise concerns and to disclose information regarding any suspected malpractice or impropriety.

If an Employee or Director has knowledge of or concern of illegal, dishonest or fraudulent activity or any other violations of the Code of Conduct, several channels are available to seek guidance or make a report. As a first step, it is advised that the Employee must contact and report the matter to their immediate supervisor. If the immediate supervisor is the subject of concern, then the Human Resources Department, the Group Legal and Compliance Officer or the Internal Audit Department would be the appropriate channels to report their concerns. All concerned departments will ultimately liaise with the Legal & Compliance Department which is authorized to investigate and report on such matters. The Company also has a Whistleblower Policy that allows anonymous reporting of concerns (Refer to the Whistleblower policy for further details). The Company will treat all such disclosures in a highly confidential and sensitive manner. The identity of the Employee making the allegation will be kept confidential so long as it does not hinder a free and fair investigation. The Group is committed to protect the rights of individuals who report issues in good faith. Retaliation against an individual who reports an issue in good faith will be considered a violation of this Code. However, Employees must exercise sound judgment to avoid baseless allegations. Intentional filing of a false report of wrongdoing will be subject to disciplinary action.

## **6 Reporting of Defaults and Legal Actions**

Defaults by customers, suppliers or any other party which may expose the Company to risk must immediately be reported to Senior Management. All reports should also be forwarded immediately to the Legal and Compliance Department along with all supporting documentation.

## **7 Conduct and Ethics**

All Employees and Directors of the Company are expected to understand the Code and conduct business in accordance with all relevant laws. Employees must use good judgment and never be involved in anything that is, or may be perceived as illegal, dishonest, or unethical behaviour. Employees and Directors must:

- Perform duties with the highest level of care, diligence, professionalism, loyalty and integrity;
- Attain the highest ethical standards, not just the minimum required, to exceed legal or procedural requirements and to deliver outstanding quality of services to customers (internal as well as external);
- Observe appropriate acts, regulations, determinations and lawful directions that relate to the performance of official duties;
- Treat colleagues with respect, be courteous and sensitive to everyone's rights, beliefs, duties and aspirations;

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- No discrimination when dealing with colleagues on racial/ethnic origin, gender religious/philosophical beliefs, political opinions, trade union membership, health, nationality, or judicial data such as criminal records or civil proceedings.
- Adopt a friendly, professional and helpful attitude in dealing with clients, customers and colleagues.
- Not to take, or seek to take, improper advantage of any official information acquired in the course of employment;
- Behave in a manner that maintains or enhances the reputation and professional standing of the Company;
- Act fairly and honestly with those who are affected by our actions and treat them as we would expect them to treat us if the situation were reversed.
- Adhere to the highest ethical standards of conduct in all business activities and act in a manner which enhances the Company's standing as a corporate citizen and ethical competitor within the business community;
- Pursue no business opportunity that requires a violation of these principles;
- Report suspected ethical violations; Knowing that the Company fosters relationships based on mutual trust and respect; Employees may question a Company practice without fear of adverse consequences; and
- Reference to other Company policies that require compliance.

## 8 Diversity and Inclusion

The Company takes pride in its diversity and strives to create an inclusive environment. Employees and Directors of the Company are therefore responsible for promoting an inclusive environment. Employees and Directors must respect the Company's diversity and foster an atmosphere of trust and openness

## 9 No Harassment

The Company aims to provide a work environment that is free from any form of harassment and any offensive or disrespectful conduct. Harassment includes any kind of verbal, written, visual or physical conduct that creates a hostile or intimidating work environment. Such conduct includes, but is not limited to, sexual harassment, offensive language or jokes, racial, gender or religious based slurs, degrading comments or any behaviour that is hostile or threatening. Harassment of any form is not tolerated and will lead to disciplinary measures.

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## 10 No Child Labour

The Company is committed to protecting the rights and well-being of children, and therefore the management should strictly comply with the following:

- Strictly prohibiting child labour for those under the age of 15 (fifteen) years.
- Comply with all legal provisions on child labour.
- Juveniles aged between 15 and 18 may work subject to the following:
  - a. Participate in light work that does not hinder their education or endanger their health or development.
  - b. Obtain written consent from the juvenile's guardian for their work/employment.
  - c. Obtain a medical certificate confirming the physical fitness of the juvenile for the tasks entrusted to him.
  - d. Their working hours shall not exceed six (6) hours per day,
  - e. Should have a break/s totalling at least one hour per day,
  - f. Not to work more than four consecutive hours without a break.
  - g. The breaks (rest period/s) will be calculated as part of the working hours.
  - h. Their work is prohibited at night from seven in the evening and seven in the morning.
  - i. Not to assign them for any dangerous or arduous tasks that endanger their health and safety.
  - j. Not to work overtime, on weekends, or on public holidays.
  - k. Their safety must be ensured.
  - l. Protect them from exploitation.

## 11 No Slavery & Human Trafficking

The Company affirms its respect and commitment to human rights, freedom, dignity and fairness. .and therefore, the management, all Employees and stakeholders of the Group must observe these rights both generally and as following:

- All forms of slavery and human trafficking in the Group are strictly prohibited.
- It is strictly forbidden to exploit individuals through coercion, force or deception.
- All practices resembling slavery or forced labour are strictly prohibited.
- It is strictly forbidden to engage in any transactions involving or related to human trafficking,
- Ensure that no employees, customers, suppliers or generally any member of the Group, directly or through our supply chains, are subjected to any form of slavery or forced labour.
- Commitment to proper ethical behaviour and respect for human dignity.
- Implement strict measures to ascertain the above, including without limitation:

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- a. Carry out comprehensive due diligence and ongoing monitoring to ensure that the above principles are applied.
- b. Include a special item within the KYC & KYS documents indicating its commitment to the above.
- c. Not to deal with any party that detracts from the freedom or dignity of its employees.
- d. Activating complaint channels and submitting reports for any violation related to human freedom and dignity to the Senior Management of the Group as well as to the official authorities.

## 12 No Violence

The Company has a zero-tolerance policy for violence in the workplace. Acts of violence or assault of any form is likely to lead to dismissal in accordance with the UAE Law. Employees and Directors are prohibited from engaging in any activity that may lead to any other individual feeling threatened or unsafe. No Employee or Director of the Company is to possess weapons of any sort while on the work premises as well as while engaged in official duties outside the workplace.

## 13 No To Unfair Competition

The Company is committed to outperforming its competitors within a legal and ethical framework. As such,

- Employees and Directors should make every effort not to make false or untruthful statements about competitors.
- Employees and Directors should respect a competitor's intellectual property and obtain competitive information only through legitimate means.
- The Company is committed to ensuring that it abides by the UAE Competition Law and all applicable laws within the jurisdictions where it operates.
- Employees and Directors must demonstrate integrity in their business relationships. Employees and Directors should always strive to earn and develop business relationships through honest and ethical practices. Unfair and deceptive trade practices are serious violations of the Group's Code. Therefore, involvement in such actions will not be tolerated.

## 14 Audits

During employment, Employees and Directors may be asked to participate in an audit or internal investigation conducted by the Group's Legal & Compliance Department, internal or external auditors or any third parties duly authorized by the CEO, Board of Directors and/or shareholders. Employees are expected to cooperate fully and honestly.

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## 15 Use of Company Resources

It is every Employee's responsibility to protect and safeguard the Company's resources and use them in the manner intended. Unless specifically authorized, the use of the Company's resources or services paid for by the Company, for personal purposes or gain is strictly prohibited. Employees are expected to use good judgment before using Company's resources. Such resources include but are not limited to:

- Facilities, office equipment, supplies, machinery, spare parts, materials and products;
- Vehicles, vessels, machinery and equipment;
- Computers and computer software;
- Security passes and stationery;
- Stamps and postal services; and
- Company funds.

Misappropriation of Company assets, whether through unauthorized removal of equipment, or through embezzlement or intentional misreporting of time or expenses will result in disciplinary action, including termination of services. The Company treats theft of assets belonging to other Employees and Directors the same way it treats theft of Company assets.

The responsibility of protecting Company funds is specifically important for Employees and Directors with the authority to approve expenses and manage budgets. Employees and Directors must ensure all funds are used for their intended purpose only, are duly approved and accurately recorded.

## 16 Handling Cash

The receipt and custody of cash is restricted to Employees who are required to do so in the course of their official duties. No other Employee should accept money unless specifically authorized. Any cash accepted on behalf of the Company must be accounted for immediately and in accordance with formal instructions. The donations, release from responsibility and waiver of any sorts of rights or claims, are rights given only to certain individuals in the top management and in accordance with strict written limits, policies, procedures and authority matrices.

## 17 Compliance with Legal and Regulatory Frameworks

All Employees, and Directors of the Company must, always, comply with the laws of United Arab Emirates and the laws that prevail in the jurisdiction in which they operate. Offences involving, in particular: consumption or trafficking of drugs; alcohol consumption on Company premises or in labour accommodations; downloading or possession of pornographic or inappropriate material including material that encourages or condones hatred; propagating violence; fraud; seeking, accepting or offering bribes; or illegal importation or exportation of goods, will be considered gross

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misconduct leading to immediate dismissal of employment. This action may also lead to further penalties as applicable under criminal proceedings.

Employees and Directors must never use their position or relationships established in the course of their employment to inappropriately influence or interfere with action being contemplated by internal investigation officials or external law enforcement authorities.

## 18 No Corruption and Bribery

- a. Unethical arrangements with customers, suppliers, government officials, or any third parties that result in personal benefit or business advantage are strictly prohibited.
- b. Activities such as bribery, extortion, kickbacks are not only a violation of this Code but are also illegal. Therefore, in interactions with the public, including customers, retailers, tenants, suppliers, or with coworkers within the Company, it is of utmost importance that Employees and Directors are, perceived to be, free from involvement in any form of bribery or actions that may be construed as corruption.
- c. All sorts of payments, gifts, services or facilities for or to any employee in the government is strictly prohibited.
- d. If an Employee or Director, a family member or a close friend of an Employee or Director, has any interest in a company bidding for contracts with the Company, it must be declared.
- e. Employees must not accept or ask for any personal discount, service or special treatment from any supplier or customer unless such things have also been provided officially to all Employees of the Company.
- f. It is prohibited to accept gifts or payments that may create or cause and influence in the decision-making in general, and it is prohibited for any Employee or person in a decision-making position in the Company to accept any gift exceeding AED 1,000 in all cases.
- g. If a person is not confident about the legality of the financial rewards paid to any party, he should immediately report to the Group CEO and Group Legal and Compliance Department.

## 19 No Money Laundering

Money Laundering is the process by which proceeds from illegal activities are concealed or given the appearance of legitimate funds. Employees should always ensure they are conducting business with reputable customers for legitimate business purposes. No transactions should be made with any third party unless preceded by a proper Know your Customer (KYC) or know your Supplier (KYS) process in accordance with the Company requirements. If the legitimacy of any transaction is in suspect, please contact the Group's Legal and Compliance Department.

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## **20 International Trade**

As a Company operating globally and with the country of its domicile being one of the largest global hubs in the world, the Group's transactions span over national borders and may be subject to laws that regulate imports and exports. Such regulations may include (but are not limited to) government restrictions, embargoes, legal economic sanctions and/or boycotts. If Employees are involved in the transfer of goods and services across borders on behalf of our Company, compliance with all applicable legal requirements is mandatory. Always consult with the Group's Legal and Compliance Department on this subject.

## **21 Business records**

The Company's business records, including its financial statements, contracts and agreements, quality reports, Employee time records, expense reports and submissions of benefit claims, reimbursement claims as well as resumes should always be accurate and representing the facts fairly. Any type of business record, irrespective of the amount must be properly authorized, executed and recorded.

Misrepresentation of any business record is tantamount to fraud and will not be tolerated. Employees should never falsify, omit, misstate, alter or conceal any information that would misrepresent the facts. In addition, Employees and Directors should never allow any third party to compromise our records.

All business records that must be retained in accordance with Company policies and the laws of the United Arab Emirates or any applicable other jurisdiction. The Group Legal and Compliance Department should be consulted on any questions relating to the legal retention requirements.

## **22 Conflict of Interest**

A conflict of interest arises when a Company's Employee's, Director's, or representative's personal activities or relationships interfere, or appear to interfere, with their ability to act in the best interest of the Company. To avoid such situations, Employees and Directors must:

- Not place themselves in a position where allegations of unfairness may be made; particular care should be taken when selecting suppliers on behalf of the Company.
- Not use any information obtained in the course of their duties to advance private interests or those of others; and
- Not engage in other private business unless approved in writing by the Chief Executive Officer in addition to obtaining all the official approvals as required by law.
- Declare all activities and relationships which may have, or may be perceived to, conflict with the interest of the Company.

## 23 Dealings with Related Parties

All transactions whether have already been entered with the Company or to be entered into with the Company should always be conducted in arm's length basis. In case any Company's transaction may be related to a Shareholder, Director, committee member or Employee whether directly or indirectly through a related person<sup>1</sup> or a related entity of an Employee, such related Employee should immediately and without delay disclose such relation to his/her first line of management with a copy to the Group Chief Legal & Compliance Officer, not to get involved in the negotiation, execution, and/or implementation of such transaction in any manner or communicate with such related person in Company's business related matter. Such transactions shall not be concluded without obtaining the prior written approval of the Group CEO or Group Chief Legal & Compliance Officer. If the transaction is related to the Group CEO, then the reporting and approval should be to and from the Group Board of Directors. However, if the value of the transaction is exceeding 5% of the Company's capital, then such reporting and approval should be sought from the shareholders of that Company.

All Employees should sign the Disclosure of Related Parties Transactions form as enclosed herewith. Failing to disclose a related party transaction or signing the form as stipulated above will be subjected to disciplinary action, which will vary between five days deduction from salary to termination from employment.

A separate clause to be added to all Contracts within the Group, confirming that neither of the parties to the contract or any person or entity related to it, has any direct or indirect relation with any Employee or a person or entity related to the Employee, has been involved in the contracting process of the contract, unless the necessary disclosure and approval of such relation have been duly obtained as mentioned above.

<sup>1</sup> Related party, shall include but not be limited to parents, spouse, children, siblings, uncles, cousins, and their predecessors, descendants, and in-laws and as well the close friends

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## 24 Confidentiality and Use of Information

Employees have a duty to maintain the information that have been obtained in the course of their employment and its confidentiality. This rule extends to documents, records, and information whether received in writing, orally, visually and whether stored physically and/or electronically. Employees are required to sign the Confidentiality and Non-Disclosure Undertaking. The Company respects the privacy of all its employees, customers, suppliers, business partners and consumers. All personal data must be handled responsibly and in compliance with all applicable laws. Employees who receive personal data of others must take care to keep such data and information confidential and to prevent unauthorized disclosure or use. All such information shall be used exclusively in the due course of the business of the Company and for the purpose for which it is provided for.

In the normal course of business, some Employees may have access to information about activities before it becomes public knowledge. Until such information is released to the public, this knowledge is considered “insider” information and must be kept confidential. Employees with access to non-public information about the Company may not discuss such information with anyone outside of the Company or disclose it by any means. Even within the Company, such information is strictly on a “need to know” basis and only with other colleagues who require such information to perform their jobs.

## 25 Intellectual Property

The Company’s intellectual property must be always protected. In addition to brands, logos, trademarks, designs (wherever applicable), patents, customer lists, knowhow, copyrights, internal policies and procedures, the Company’s intellectual property also includes its employee’s work product. As part of their duties, Employees create work that requires the use of Company time and resources, and all efforts should be made to ensure that this is protected.

## 26 Interaction With the Public, Media and Community Involvement

When interacting with the public, Employees must ensure the highest standard of service and must:

- Not be involved in any promotional activity related to a customer or supplier and remain unprejudiced in dealing with the public;
- If applicable, wear assigned uniform and identification badges while on duty;
- Refuse and report to management, any attempt by members of the business community (including customers or suppliers) to offer inducements or other benefits in exchange for favours or special treatment;
- Not provide services to any party that competes with the Company. In addition, Employees generally may not accept compensation for services performed for the Company outside of their regular job, except when those services have been disclosed to and approved by the Company.

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- All public statements or acts must be carefully thought out and personal views kept separate from corporate views.

## **27 Observing External Communication**

### **27.1 Media**

If an Employee or Director is ever asked to discuss or comment on Company business by members of the media, he/she is not permitted to provide any information but is instead required to politely state that she/he is not authorized to comment. Similarly, when using social media, Employees should explicitly state that opinions shared are theirs and not the Company's.

### **27.2 Social Media**

Employees and Directors should refrain from making or posting negative comments about the Company, colleagues, customers, competitors or providers on social media or internet forums. Employees should exercise caution in making any controversial comments or postings which might be perceived to be racist, sexist or strong political views. All possible care should be taken not to disclose confidential information on social media. Furthermore, the Company's logo should not be used without express permission.

### **27.3 Email etiquette**

Employees should refrain from using Company email addresses for personal matters. Furthermore, the language and tone used in email communications to both external and internal recipients should be professional and respectful. Slander of any form will be considered a violation of the Code and will result in disciplinary action. Employees should avoid repeatedly copying parties on emails when it is not required to do so.

### **27.4 Community Involvement**

The Company encourages Employees to participate in community activities to the extent permitted by law. However, in the conduct of personal affairs, Employees should clearly state that views and actions are their own, and not those of the Company.

Employees also should ensure that their external activities do not interfere with job performance and do not constitute a conflict of interest with the Company. The Company encourages Employees to broaden their knowledge and competence by participating in job-related professional society meetings, seminars, and other similar events provided that such societies are permitted by UAE Law and such activities or

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involvements do not interfere with performance or clash with the Company's targets or image. It is the Employee's responsibility to use good judgment, however, in serving as a speaker or expert, or in any other capacity that involves payment for participation, Employees are required to obtain approval for their participations from the Chief Executive Officer based on recommendation from the Chief Legal and Compliance Officer. All presentations made must be clearly marked with legal disclaimers as stipulated by the Chief Legal and Compliance Officer.

## 28 Environment, Health, Safety and Amicable Work Environment

### 28.1 Work environment

Employees have the right to a healthy and safe workplace free of discrimination and harassment in which individual and organizational objectives can be met. A good working environment is one that is:

- Fair and equitable;
- Safe and supportive;
- Free of alcohol and drugs;
- Free of harassment and discrimination;
- Free of smoking in areas where smoking is prohibited;
- Values individual differences and cultural diversity;
- Provides honest performance feedback and development opportunities;
- Promotes collaboration and teamwork;
- Free from rumours, slanders, talebearing, or any acts or conduct which may affect the reputation of the other Employees or their performance.
- Free from political or religious arguments
- Encourages care and regard for the environment and health.

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## 28.2 Health & Safety

The Company is committed to safeguarding the health and safety of its Employees, visitors, contractors, consumers and communities. The health and safety practices at all Company's facilities are designed to protect all affected parties. However, safety is everyone's responsibility; as such, Employees must insist that work be performed safely, no matter what the job is and act in a manner that fosters a healthy and safe work environment. If an Employee comes across a practice that is unsafe or jeopardizes the health and safety of any individual, or has recommendations for improvement, they are encouraged to contact the Senior Management contact team.

## 28.3 Visitors at Workplace

To ensure the safety and security of Employees, Directors and facilities at the Company's premises, visitors must act in a manner that maintains the Company's safety standards, protects against theft, ensures the security of equipment, protects confidential information, safeguards Employee welfare, and avoids potential distractions and disturbances. Employees are responsible for escorting their authorized visitors to and from the meeting/conference rooms in all circumstances.

## 28.4 Environmental Involvement

The Company is committed to environmental compliance, pollution prevention, efficient use of resources, consideration of climate-related impacts, and responsible environmental stewardship by minimizing waste and emissions, promoting recycling and energy efficiency, complying with applicable environmental regulations, and supporting sustainable business practices in all aspects of its operations.

## 29 Compliance With the Code of Conduct

Non-observance of this Code of Conduct shall be construed as misconduct that could call for disciplinary action, including suspension or termination of services in deserving cases. The decision in this regard will lie with the Business Unit Head and the HR Manager in accordance with the advice and guidelines of the Group Legal & Compliance Department. Please refer to the disciplinary measures policy.

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