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enoc

Code of Business Conduct

The Way We Lead

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THE CODE ELEMENTS

People



Fair Treatment / Tolerance / Alcohol and Drugs / Workplace Violence,
/ Discrimination and Harassment Prevention / Environment, Health &
Safety / People in Practice

Integrity



Conflict of Interest / Business Courtesies, Gifts and Entertainment
/ Employment of Relatives / Outside Activities / Insider Dealings /
Integrity in Practice

Third Party Relations



Third Parties / Third Parties Selection / Customers / Business
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Information Management



Records Management / Proprietary and
Confidential Information / Personal Data and Data Privacy
Intellectual Property & Trademarks /
Information Management in Practice

Trust



Company Property / Public Statements
Social Media / Use of IT and Security /
Trust in Practice

Compliance



Whistle Blowing / Anti-Fraud / Anti-Corruption Compliance /
Anti-Money Laundering / Antitrust and Competition Laws
Trade Compliance and International Sanctions /
Audits and Investigations / Compliance in Practice



Group CEO Message

Dear Fellow Employees,

As an integrated energy player, the success of the Emirates National Oil Company Ltd. (ENOC) LLC and its group of companies is founded upon strong governance practices that ensure the highest ethical standards are maintained in conducting business activities, thereby providing a solid foundation for future growth.

Corporate governance and ethical business practices are integral to our license to operate, as we work diligently to realise our Government's vision and serve the communities we operate in. It is the trust of our Government, partners, customers and employees that drives us forward as a trusted business partner.

With this in mind, ENOC's Code of Business Conduct is an integral part of our corporate philosophy as it is designed to show us the direction we should pursue to ensure that governance and integrity are at the heart of our business. ENOC's Code of Business Conduct provides guiding principles that every employee should understand and follow. ENOC Code of Business Conduct can only be effective and useful with committed dissemination, implementation and monitoring.

Embedding ENOC's Code of Business Conduct at every level of the organization will positively influence employee behavior and contribute to our corporate culture. The Code's principles of integrity and transparency should transcend any business motives. Any violation of ENOC's Code of Business Conduct should be reported without fear of retaliation.

I encourage you to ask questions and clarify any doubts you may have. Details on ENOC's Ethics Hotline Reporting Tools are provided at the end of this document. ENOC's proud legacy is testament to our ethical business conduct. Let's work together to build on past successes and realise an extraordinary future.

Saif Humaid Al Falasi
Group Chief Executive Officer

OUR VISION

“To be an innovative energy partner, delivering sustainable value and industry leading performance.”

OUR MISSION

/ We deliver world-class Sustainable and Integrated energy solutions. We do so by striving for Excellence in operations, Innovation and Happiness of our employees, customers and partners



OUR VALUES

Our values are embedded in the letter and spirit within the Code

Team Work

Working together by sharing ownership, responsibilities and outcome.

Integrity

Being honest, truthful, reliable and fair while dealing with all stakeholders.

Transparency

Being open, straightforward and consistent in all we do, by communicating with clarity, simplicity and precision.

Respect

Acknowledge, recognize, and value all stakeholders.

Customer focus

Position customer first in all that we do.

OUR CODE OF BUSINESS CONDUCT

The Code represents our ethical aspirations and commitment towards our stakeholders. All of our employees at every level and across every area of our businesses shall uphold the highest ethical standards in their day to day activities

The Code is a baseline, the business policies and practices may require more strict compliance than required by the Code, in those instances, entities must follow the stricter policy, practice or law. It includes references to the relevant policies and procedures and other helpful resources however the Code is not a compilation of all ENOC policies.

The rights of our employees and ENOC's rights as an employer are governed by the laws of the country of employment, the policies of the employing entity and the individual's written employment contract. The Code is an ethical framework that defines basic ethical standards, principles and behaviors that ENOC employees shall consider and adhere to in performing their work duties inside and outside the workplace.



WHO SHOULD FOLLOW THE CODE?

The Code applies to all our employees, including those in wholly owned subsidiaries and joint ventures where the Code has been implemented.

These stakeholders are responsible for complying with all applicable laws and regulations in each country where ENOC does business and for knowing and complying with the Code and other ENOC policies. If a local law conflicts with a policy in the Code, the local law shall take precedence.

Our entities and employees are responsible for being familiar with its contents. The most current version of the Code is available on ENOC's website and ENOC's Internal Portal.

Violation of the Code is subject to disciplinary action. Business Segments are responsible for ensuring that their policies and practices are consistent with the Code.



Subsidiaries and Joint Ventures

Wholly owned subsidiaries

Dragon Oil (Holdings) Limited
Dragon Oil Turkmenistan Limited
Dubai Natural Gas Company Limited
Emirates Gas LLC
ENOC Lubricants and Grease Manufacturing Plant LLC
ENOC Industrial Products Marketing
ENOC Lubricants Marketing LLC
Dubai Lubricants Processing Plant FZE
ENOC Supply & Trading LLC
ENOC Processing Company LLC
Emirates National Oil Company (Singapore) PTE LTD
ENOC Tasjeel LLC
Horizon Emirates Fujairah Distribution
Horizon Emirates Fujairah Trading
Horizon Emirates Jebel Ali Petroleum
Horizon Emirates Terminals Limited Distribution
Horizon Jebel Ali Terminals Limited
United Fuel Company

Joint Ventures

Arabtank Terminals Limited
EPPCO Aviation
EPPCO International Limited
EPPCO Lubricants
ENOC Misr
Horizon Djibouti Terminals Limited
Horizon Singapore Terminals Private Limited
Horizon Tangiers Terminals SA

HOW IS THE ETHICS AND COMPLIANCE PROGRAM MANAGED?

Business Ethics & Compliance Function (BE&C)

ENOC's Business Ethics & Compliance function (BE&C) has been established to provide permanence to the Code and reinforce it in business practices. BE&C is headed by the Chief Ethics & Compliance Officer and is supported by an independent Business Ethics Committee. BE&C reports to ENOC's Audit Committee and administratively to the Group Chief Executive Officer.

Quick Find: For any suggestions and feedback, contact Business Ethics & Compliance function through the enquiry email (ethicsenquiry@enoc.com).

Business Ethics & Compliance Program

The Business Ethics & Compliance Program is developed on an annual basis and consists of the following six sections:

- 1 / Standards, Policies, Procedures and Systems
- 2 / Ethics and Compliance Program Administration
- 3 / Communications, Education and Training
- 4 / Monitoring, Auditing and Internal Reporting systems
- 5 / Response and Investigation, Discipline, and incentive
- 6 / Risk Assessment

Business Ethics Committee (BEC)

The purpose of the Business Ethics Committee is to maintain an ethical business environment through review and approval of certain Business Ethics & Compliance activities. The BEC's primary responsibilities are to review ethical standards, oversee the activities of ENOC Ethics Hotline, reported cases, investigations and Conflict of Interest disclosures. The BEC's authorities and responsibilities are defined under the Business Ethics Committee Charter.

The Committee consists of 5 members as following:

- / ENOC Group Chief Executive Officer (Chairman – BEC)
- / Chief Ethics & Compliance Officer (Member – BEC)
- / Chief Financial Officer (Member – BEC)
- / General Counsel– Group Legal (Member – BEC)
- / Director - Group Human Resources (Member – BEC)
- / Manager– Ethics & Compliance (Secretary– BEC)

*Do you need more information?
Reference Document:
[Business Ethics Committee Charter](#)*

WHAT ARE OUR RESPONSIBILITIES TOWARDS THE CODE?

Our Employees' responsibilities

We are dedicated towards the highest ethical conduct and our employees should:

- / Understand and comply with the Code.
- / Act responsibly within the limit of given authority.
- / Seek guidance when in doubt from the line manager or Business Ethics & Compliance Function.
- / Report unethical conducts or breaches of the Code via ENOC Ethics Hotline reporting mechanisms.

Our Managers' responsibilities

In addition to the above responsibilities, our managers should also:

- / Lead by example and consider ethical implications in all business decisions.
- / Recognize and reinforce employees' ethical behavior.
- / Respond promptly to employees seeking advice and guidance in reporting misconducts.
- / Foster an environment where employees feel comfortable to speak up and raise their concerns.

/ Prevent retaliation towards any employee who reports misconduct or assists in an investigation.

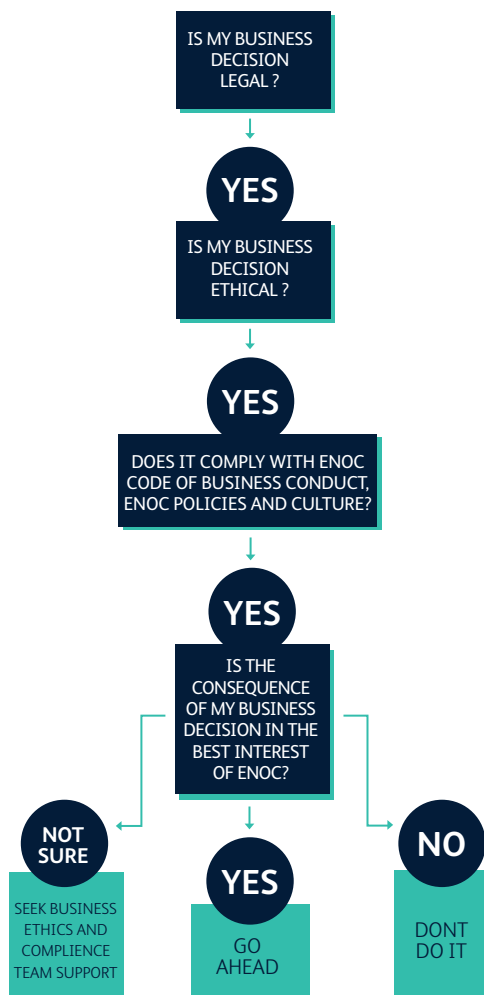
ENOC Group's Responsibilities

- / Foster a responsible and ethical corporate culture.
- / Raise awareness and communication of the Code to ENOC employees.
- / Apply proper legitimacy, objectivity, and fairness in making decisions.
- / Encourage employees to address and resolve issues.
- / Provide confidential and safe reporting tools.

HOW TO ETHICALLY EVALUATE DECISIONS?

Ethics Decision Tree

In day to day operations, we sometimes encounter situations that will test our ethical judgment and integrity. The below decision tree can be a useful tool to evaluate our decisions.



HOW TO REPORT MISCONDUCTS?

ENOC Ethics Hotline Reporting Mechanism

ENOC Ethics Hotline has been designed to cultivate a positive work environment through enabling employees to report any unethical conduct or a violation of the Code in an easy and confidential manner.

The Hotline is a confidential multi-lingual independent platform available through phone and online reporting system. It is managed by an external service provider with professional and experienced consultants who are able to obtain sufficient information effectively and take initiative in appropriately dealing with sensitive disclosures. The reporter can follow up on the case and interact confidentially with Business Ethics & Compliance team through the online system.

Ethical Violations Reporting Guidelines

Our employees shall follow the below guidelines in reporting ethical violations via ENOC's Ethics Hotline:

- / Provide sufficient information, details and supporting documents if available
- / Do not initiate any investigative work without prior approval in line with ENOC's established policies
- / Reported cases shall be based on legitimate concerns and with reasonable suspicion of violations
- / Do not engage in defamation of the Company or co-workers, directly or indirectly
- / Check the status of the reported case via the web-tool for any updates or requests for information
- / Extend support in a timely manner to

Business Ethics & Compliance in reviewing cases

/ Maintain complete confidentiality of the reported case

ENOC Ethics Hotline Reporting Tools:

ENOC Ethics Hotline Country Phone Lines:

United Arab Emirates:
800 ENOC Ethic (800 3662 38442)

Singapore:
1800 3662 222 (1800 ENOC CBC)

Turkmenistan:
+993 654 0 999 2

Saudi Arabia:
800 8500874

Worldwide:
+971 43 782 024

ENOC Ethics Hotline Whistleblowing Platform
enoc.speakup.ae

Retaliation

We are committed to integrity and we aim to foster an environment that allows employees to report misconduct without the fear of retaliation. Our Company has a non-retaliation policy ("ENOC's Whistleblowing Policy") to protect employees who report misconduct in good faith. Any form of retaliation shouldn't be exercised on any employee for reporting a case or participating in an investigation.

If you encounter retaliation for reporting misconduct, please contact BE&C immediately. Anyone who retaliates against another employee for reporting misconduct will be subject to disciplinary action.

*Do you need more information?
Reference Document: ENOC's Whistleblowing Policy*



Q&A

Q1: What happens if inaccurate or false information was reported?

Investigations are commenced if there is a reasonable suspicion of misconduct. We thoroughly review each case and set clear scope for each investigation to verify the misconduct. However, if inaccurate or false information was provided during the course of the investigation with the intent to mislead, this is considered a violation of the Code and the reporter shall be subject to disciplinary action.

Q2: Why should I report?

The success of ENOC is based on our employees' drive towards a shared vision built on ENOC's values. By reporting misconduct, you are not only fulfilling your obligations but you are also contributing to foster a positive workplace. Unethical behaviors have negative consequences on people, performance and profitability. Your voice is very important to the wellbeing of ENOC.

Q3: When should I speak up?

You are encouraged to speak up as soon as possible in any of the following scenarios so that we can quickly address them

- 1 / If you are not sure of the ethical implications of your decision and need advice.
- 2 / If you witness misconduct or expect misconduct to occur.
- 3 / If you have been involved in misconduct.

Q4: What information do I need to report and can I remain anonymous?

You should provide clear and complete information on the nature and details of the

case to enable us to act upon it promptly. We encourage reporters to disclose his/her identity. However, the reporter has the right to remain anonymous.

Q5: Who receives cases reported through ENOC's Ethics Hotline?

The Business Ethics & Compliance Function receives notification for any update on the online platform including new registered cases or updates on existing cases. The Business Ethics Committee has access to the online platform.

If a member of the Business Ethics & Compliance Function or the Business Ethics Committee is personally involved in a case, he/she will be excluded from all matters related to the case.

Q6: I have witnessed misconduct and would like to report it but I am scared?

We understand that reporting against your employer or colleague is a sensitive matter. It is for this reason that we have established ENOC's Ethics Hotline and the Whistleblowing Policy. The Hotline provides structured confidential process for reporting misconduct. The Whistleblowing Policy protects reporters of misconduct from retaliation. Retaliatory actions maybe in the form of, but not limited to: termination, demotion, reductions in pay/ hours, withholding promotion, reassignment to unsuitable post or position, intimidation, harassment, or otherwise mistreating the reporter. If you encounter retaliation for reporting misconduct, please contact Business Ethics & Compliance team immediately.

01



People

- / Fair Treatment
- / Tolerance
- / Alcohol and Drugs
- / Workplace Violence, Discrimination & Harassment Prevention
- / Health, Safety and Environment, (HSE)
- / Corporate Social Responsibility (CSR)
- / People in Practice

FAIR TREATMENT

We are committed to treat our employees in a fair and respectful manner.

We treat each individual fairly and recruit, select, train, promote and compensate based on merit, competency and other work-related criteria. ENOC Group’s Human Resources does not discriminate in treatment or employment based on race, colour, age, religion, sex, national origin, disability or genetic information. ENOC Group’s Human Resource Policies are benchmarked against best practices in the region. We comply with the laws governing employment and labor practices within the countries we operate in. Freedom from discrimination includes freedom from any form of harassment. Harassment includes conduct that is intended to interfere or that has the effect of interfering with a fellow employee’s work performance or creating an environment that is intimidating, hostile, or offensive to the employee.

Do you need more information?
Reference Documents: Group Human Resources Policy Manual



TOLERANCE

We embrace our diverse workplace environment with respect.

We strongly support our employees right to having their own personal beliefs and values. However, personal beliefs aside from those covered by the Code should not be forced on others in the workplace.

Our employees should not use or facilitate ENOC’s communication tools (letters, e-mail, bulletin boards etc.) to advocate religious, ethnic, political or other potentially sensitive personal preferences. Our employees should not create, disseminate or circulate malicious rumors and gossip, which affect fellow colleagues, thus creating an atmosphere of stress and employee disengagement.

To maintain the professionalism appearance and image at workplace, our employees shall adhere to the accepted and appropriate dress code stipulated by

Group Human Resources when representing ENOC. Our employees should take into consideration the prevailing culture in the country and job requirements to ensure they are appropriately dressed.

Do you need more information?
Reference Document: Group Human Resources Policy Manual – Dress Code policy

ALCOHOL AND DRUGS

ENOC strictly prohibits the use of alcohol and drugs in the workplace.

We conduct our business with high standards of safety, concern for the environment and the health of our employees.

Apart from being a serious violation of the local regulations, the abuse of alcohol, drugs (illegal or legal) or other substances in and outside of the workplace can impair performance and are a serious threat to health and safety. As a socially responsible organisation, we are fully committed to ensure that all our workplaces are completely “Alcohol and Drugs Free”. We have a “zero tolerance” policy on drugs, alcohol or other substances for employees on duty. All employees must be aware of and abide by ENOC’s Alcohol and Drugs Policy. We strive to maintain working conditions which are safe, healthy and in compliance with applicable laws for our employees and visitors in our premises.

Do you need more information?
ENOC Group Human Resource Policy Manual (Alcohol and Drugs Policy and Corrective Guidance Policy)

WORKPLACE VIOLENCE, DISCRIMINATION & HARASSMENT PREVENTION

ENOC is committed to providing a safe working environment for our employees, free of threats, harassment, intimidation and physical harm.

Everyone has the right to work in a safe environment and shares the responsibility for assuring each other’s safety. We adopt a policy of zero tolerance for workplace violence, discrimination and harassment. This means that we will investigate and take appropriate action against any threat to a safe workplace. We prohibit violent behavior including, but not limited to, physical assaults, fighting, threatening comments, intimidation, and the intentional or reckless destruction of property belonging to us, our employees or our customers. Any comment or behavior that could reasonably be interpreted as intent to do harm to people or property should be considered a threat and must be reported to your line manager, Human Resources or Business Ethics & Compliance team through our reporting mechanisms. We also prohibit the unauthorized possession and/or use of weapons by any individual in our premises.

Do you need more information?
Reference Document: Human Resources Policy Manual (Corrective and Guidance Policy)

HEALTH, SAFETY AND ENVIRONMENT, (HSE)

Employees have the right to work in a safe and healthy work environment. HSE is everyone's responsibility. Our employees are empowered with a "stop work authority" to stop any unsafe acts or conditions until the hazards have been removed.

HSE plays a fundamental role in our Company's activities. We are committed to conduct our business in a responsible manner to ensure no harm to people, environment and assets. The overall strategy for managing HSE risks is embodied in ENOC Group's HSE & Quality Policy. The HSE & Quality Policy commits us, management and staff, to operate our facilities in a manner which protects and preserves the natural environment and promotes the health, safety and security of our employees, customers, suppliers, contractors and the general public. We firmly believe that implementation of HSE guidelines and standards is important to ensure the sustainability of our business activities. At minimum, we abide by the local and national HSE laws, and strive to adopt internationally accepted standards and best practices where applicable.

Do you need more information?

Reference Document: ENOC Group's HSE & Quality Policy

CORPORATE SOCIAL RESPONSIBILITY (CSR)

Creating positive social value for our employees, communities and stakeholders.

ENOC's commitment to CSR is integrated throughout the organization, aligned with the Group's values, and practiced in our stakeholder relationships.

Through impactful initiatives that contribute to sustainable development, we commit to improving the quality of life of our workforce and their families, the local communities within which we operate, and society at large.

We encourage employees to actively participate in our CSR programs through donations and volunteer work. Employees shall refer to ENOC Group's Sustainability team for further information on how they can contribute to CSR initiatives.

Do you need more information?

Reference Documents: ENOC's Sustainability Principles Manual, ENOC's CSR Framework and Policy, and ENOC Group's Human Resources Policy Manual.



People In Practice

Q1: What should I do if my manager is using offensive words and threatens me?

The use of offensive words and/or threats is unacceptable in our work environment. We advise you to report such misconduct to a Human Resources' representative who can guide you through the grievance process as detailed in ENOC Group's Human Resources Policy Manual for proper action.

Q2: I work in the night shift and my colleague offered me herbal pills to help me stay awake, can I take them?

No, as per ENOC's Drugs & Alcohol Policy available under the Group's Human Resources Policy Manual, employees are strictly prohibited from distributing or taking drugs (legal or illegal) within the Company's premises. Employees on official duties shall disclose details of any medications or drugs they are under, if any, to Occupational Health Services, so that associated risks to self or others at the workplace can be mitigated.

Q3: Can I consume alcohol in the Company's accommodation outside my working hours?

No, consumption of alcohol is prohibited in all of ENOC's premises, including Company accommodations. You may refer to Drugs & Alcohol section under Group's Human Resources Policy.

Q4: I work at the sites and my personal protective gear (such as uniforms and any equipment) is too hot and uncomfortable. Should I bother wearing it? .

The personal protective gear, including clothing, is designed to protect you from hazards and is required to ensure your safety. Ignoring such requirement violates the HSE

& Quality Policy and ENOC's Code of Conduct. If you have an issue with your work clothes or any of the personal protective equipment provided, you must report it to the HSE personnel within your organization and also to your line manager who will request that the matter be investigated by the specialists. Accordingly, you are encouraged to seek professional guidance within the organisation to solve this issue.

Q5: I was walking past construction activities at my workplace and found a contractor working on a four meters high platform without any safety harness or hard hat. Shall I bother to stop him or report this to anyone?

ENOC's HSEQ Policy on 'stop work authority' requires you to immediately stop the work to prevent any incidents, counsel the individuals concerned, and ensure that the work can resume only after the safe conditions are restored. Such unsafe acts and conditions shall be reported to the Area Supervisor and or to HSE personnel for further investigation and corrective action to prevent reoccurrence of such conditions/acts.

Q6: While I was taking the rounds during my shift, I found one of the contractor's workers smoking a cigarette standing very close to a gasoline pump. I was shocked to see such a dangerous act and immediately stopped him from smoking and asked him to get out of the site. Do I need to report this incident?

Well done and we appreciate your prompt response to avert any imminent danger to life and assets. Please note that smoking in classified hazardous areas shall be treated with 'ZERO TOLERANCE' and suitable disciplinary action will be taken against those involved. Hence, such acts shall be reported to your line manager to ensure suitable disciplinary action is initiated.

02



Integrity

- / Conflict of Interest
- / Business Courtesies, Gifts and Entertainment
- / Employment of Relatives
- / Outside Activities
- / Insider Trading
- / Integrity in Practice

CONFLICT OF INTEREST

A “Conflict of Interest” exists in cases where the personal interests of an employee clash with the interests of the company.

We require that our employees do not engage in, or give the appearance of engaging in, any activity involving any conflict, or reasonably foreseeable conflict, between their personal interests and the interests of ENOC Group. Our employees are expected to give their undivided loyalty to ENOC in conducting their duties. Very often, a conflict of interest occurs when employees make decisions on behalf of ENOC, while also having a controlling or financial interest in, or receiving financial or other benefits from, an organisation that wants to do business with ENOC.

If an employee is in doubt on whether a situation is considered a conflict of interest, then he/she has the obligation to raise the matter to the Business Ethics & Compliance team for clarification purposes.

Completing and updating the Conflict of Interest Disclosure Form is mandatory for all our employees irrespective of their position or grade. Our employees are also obliged to submit the form when a matter results or may result in a real or apparent conflict of financial interest in, or receiving financial or other benefits from, an organisation that wants to do business with ENOC. (this is applicable to Immediate Relatives as well)

*Do you need more information?
Reference Document: Conflict of Interest Policy*

BUSINESS COURTESIES, GIFTS AND ENTERTAINMENT

A business courtesy can be a gift, service (including entertainment), or anything of value provided to or received from a third party.

We do not seek to improperly influence the decisions of our contractors, vendors or government officials by offering or accepting extravagant business courtesies.

All our employees and representatives must understand the ethical issues associated with gifts and entertainment and how these can affect our reputation and relationship with customers and third parties.

Any gifts or gratuities may have serious legal implications for all parties involved. Offering or accepting bribes, or anything of value with the intent to influence, is strictly prohibited.

Business gifts that compromise, or even appear to compromise our ability to make objective and fair business decisions are inappropriate. Any doubt should be resolved in favor of not giving or receiving the gift. Employees should exercise good judgment when accepting or offering a gift.

Any gifts or gratuities must be for legitimate business reasons and consistent with normal business practices. For example, employees may accept or give:

/ Limited refreshments and meals, when these items are provided during a business meeting.

/ Reasonable and infrequent meals and entertainment when offered by a business associate for a legitimate business reason and when local custom or practice would make it inappropriate to decline the offer.

/ Promotional business items with only token value, as per the limit provided under ENOC’s Gift & Entertainment Policy.

Employees should not accept or give unauthorized:

/ Monetary, personal or any other type of favors and gifts from a supplier, customer or any other third party that may result or give appearances of impartiality and favoritism. This is applicable to Immediate Relatives as well.

/ Cash or cash equivalent items such as stocks.

*Do you need more information?
Reference Document: ENOC’s Gift and Entertainment Policy*



EMPLOYMENT OF RELATIVES

Immediate Relatives is defined in ENOC Group Human Resource Policy as familial relationships up to second degree which includes: father, mother, sister, brother, wife, husband, son, daughter, grandparents and grandchildren.

To ensure that all employees are hired, rewarded and promoted fairly, we do not encourage the employment of relatives. However, where such situations arise, ENOC has developed a robust policy to avoid such conflict either at the time of hiring or during employment including hiring, selection, transfers, promotions and any other form of career advancement and salary progression processes.

Additionally, we have developed guidelines to reinforce transparency and maintain fairness in managing employment of relatives as follows:

/ No applicant or employee shall occupy a position that reports directly to an Immediate Relative or report to a manager who reports to the employee's Immediate Relative.

/ Immediate Relatives shall not be employed within the same Company of any Business Segment.

/ Immediate Relatives shall not be employed within the same Department of any Corporate Segment.

/ Employees will not be involved in making any decisions relating to the selection, appointment, transfer, or promotion including any form of permanent/ad-hoc additional compensation and/or benefits for any of their relatives up to the fourth degree.

Do you need more information?

Reference Document: ENOC Conflict of Interest Policy & ENOC Human Resources Policy Manual (Employment of Immediate Relatives)

OUTSIDE ACTIVITIES

Outside activities need to be disclosed in line with Conflict of Interest Policy.

ENOC employment contracts do not support the employment of our employees at any other organisation while working at ENOC. However, in such cases where outside employment would be of benefit to ENOC and/or the individual employee, the employee should follow the guidelines on working for third parties under the Human Resources Policy Manual.

Conflicts of interest related to outside activities should be disclosed in any of the following situations:

/ Having full or part-time employment aside from the current position the employee holds in ENOC without proper approval from Human Resource.

/ Having personal business that competes with ENOC's scope of work or deals with ENOC in any capacity.

/ Having 5% or more of shares in a business that competes with ENOC's scope of work.

/ Being able to influence decision making process of a company that competes with ENOC's scope of work.

Do you need more information?

Reference Documents: Conflict of Interest Policy and Human Resources Policy Manual (Employment Contract)

INSIDER TRADING

Employees who have access to material non-public information of ENOC or any of its business partners or third parties should not utilize such information to trade in stocks, securities, options or shares personally or through family members.

Material non-public information shall not be used for personal benefit. Our employees shall not provide tips or encourage anyone to buy or sell stocks, securities, options or shares based on inside information or material non-public information.

Insider trading is considered illegal. If you suspect any misuse of insider information, please contact ENOC Group's Legal Department immediately.

Reference Documents: ENOC's Conflict of Interest Policy and ENOC Group's Human Resources Policy Manual (Employee working for Third Parties)



Integrity In Practice

Q1: When do I need to disclose conflict of interest?

It is mandatory for all employees, irrespective of their position or grade, to fill out and submit the Conflict of Interest ("COI") form in any of the following conditions:

/ If requested by Business Ethics & Compliance Function.

/ If any change takes place that would warrant and amendment or update to a previously submitted COI form, or a new condition arises that results or may result in a conflict of interest.

/ If in doubt, raise the matter to BE&C and get clarifications on it.

Q2: I deal a lot with external parties and I receive gifts, do I need to disclose them?

Please refer to the Business Courtesies, Gifts and Entertainment section of the Code, and to ENOC's Gift & Entertainment Policy in regards to guidelines on exchanging gifts. Gifts provided from/to our external parties that are part of normal business norms with token value, and are not intended to influence business decisions, such as corporate calendars, pens & key chains, are generally acceptable.

Q3: Can I keep a pen worth approximately AED 1000 gifted to me from one of ENOC's loyal customers if he didn't ask for anything in return?

No, it is not acceptable because the gift's value is above the acceptable limit and it may appear to compromise your integrity. Such gifts should be rejected and disclosed to Business Ethics & Compliance Function.

Q4: I have a tailoring business; do I have to disclose this information?

Considering that tailoring is not within ENOC's scope of business, you are not required to disclose such information, as long as your business is not dealing in any way with ENOC.

Q5: During a meeting with a third party, we received confidential information about a new project within the third party's company, can I use this information to buy or sell stocks?

- This information is considered insider information, as it is not available to the public. As an ENOC employee, you should refrain from using confidential information for personal benefit.

03



Third Party Relations

- / Third Parties
- / Third Parties Selection
- / Customers
- / Business Partners
- / Third Party Relations in Practice

THIRD PARTIES

We build productive relationships and deal fairly with our third parties.

ENOC's third parties include our suppliers, vendors, contractors, agents, distributors, consultants, service providers, resellers, and/or anyone who performs work for ENOC or on behalf of ENOC.

We compete fairly and in accordance with the highest ethical and professional standards in our third party relationships. Our entities shall ensure that any business generated is based on superior services and products with competitive prices, not through improper, unethical, or questionable business practices. Moreover, our entities and employees shall strive for:

/ Honesty, integrity, fairness and compliance with established tendering, procurement and contracting policies, procedures and practices.

/ Championing social responsibility and sustainability practices in procurement.

/ Avoiding any dealings that might prevent or obstruct the effective operation of fair competition.

/ Encouraging and supporting reliable contractors and suppliers, locally and internationally.

/ Long-lasting business relationships built on trust and mutual benefit giving preference to competitive and quality goods and services, promoting positive supplier and customer relationships.

/ Avoiding behaviors or actions that may negatively influence, or appear to influence, procurement decisions.

Do you need more information?

Reference Documents: Quality Management Systems Manual and ENOC Third Party Code of Conduct

THIRD PARTIES SELECTION

We select our third parties based on appropriate business criteria.

Our entities will ensure that our third parties are selected objectively based on appropriate criteria, such as qualifications, competitive price and reputation. The terms of ENOC's business relationships with suppliers shall be established as per Group Procurement Procedures. Confidentiality shall be maintained to protect information shared between ENOC and its third parties. Proper supplier due diligence shall be conducted on third parties to ensure that ethics and compliance risks are identified and managed.

Third parties who conduct business with / or represent ENOC are required to comply with all applicable laws and regulations and comply with ENOC Third Party Code of Conduct. We aim to build relationships with third parties who are consistent with our commitment to the highest ethical and professional standards.

Do you need more information?

Reference Documents: ENOC's Group Procurement Procedures, Supplier Due Diligence Procedure, and ENOC's Third-Party Code of Conduct

CUSTOMERS

We aim to influence our customers positively with the way we operate our business.

We are committed to deliver superior products and services and strive to meet and exceed our customers' requirements. Customer satisfaction is crucial for our business growth and we are constantly enhancing our delivery of services. We ensure that our customers are fully informed about the products and/or services they are being offered in a transparent manner.

Do you need more information?

Reference Documents: Respective Contracts and Agreements

BUSINESS PARTNERS

Trust and integrity are our core values in building relationships with our business partners.

We build relationships with our business partners based on shared trust and values. We are committed to communicating openly and honestly. We uphold the highest professional standards and rules in dealing with our business partners and we do not consent to unethical or illegal business practices in any circumstances.

We ensure sharing the same commitment to safety, ethics and compliance in our dealings with our business partners and other third party entities.

Do you need more information?

Reference Documents: ENOC's Third Party Code of Conduct and respective contracts and agreements with third parties.



Third Party Relations In Practice

Q1: Can I work with a supplier who provides lower rates even though they may have questionable business practices?

No, we are committed to high ethical values, standards and compliance with legal requirements. Our entities should avoid such business relationships and deal with suppliers who share our commitment towards the best ethical practices.

Q2: A long-term supplier is no longer meeting our evolving business requirements; should we renew our contract with them given the pressure of loyalty?

ENOC is committed to building long lasting relationships with our suppliers. However,

it is crucial to reassess suppliers to ensure fair and objective selection of competitive suppliers who can meet our requirements.

Q3: Is it okay to conceal key information from our customers to protect ENOC's interest?

No, concealment is unacceptable. Transparency is one of our core values embedded in our business relationships; we protect our customers' rights and keep them informed with key matters related to our products and services. Such actions violate the Code and should be reported.



04



Information Management

- / Records Management
- / Proprietary and Confidential Information
- / Personal Data and Data Privacy
- / Intellectual Property
- / Information Management in Practice

RECORDS MANAGEMENT

We expect our employees to maintain accurate and updated data and communicate the same to the relevant stakeholders.

It is essential that the internal and external reports and documents that we create, make public, or provide to our stakeholders constitute full, fair, accurate, timely and understandable disclosures. The information that our entities create, such as financial reports, accounting records, business plans, environmental reports, etc. are required to be accurate, truthful, and properly maintained. The users of this information may be employees, government representatives, auditors and legal bodies.

Our employees must ensure the retention of records for requisite periods and that such records are subject to timely destruction when the specified retention period expires. "Record" for this purpose includes hard copies of documents, records on computers and electronic systems.

Employees who contribute to the creation and maintenance of records are responsible for reading and understanding ENOC's policies, directives and other procedures as they apply to their organisation.

Do you need more information?
Reference Documents: Statutory & Financial Record Retention Policy, Legal Guidance Note, and ENOC's Group Human Resources Policy Manual

PROPRIETARY AND CONFIDENTIAL INFORMATION

Proprietary and Confidential information shall be classified properly to protect critical business information from misuse and maintain our competitive advantage.

ENOC's proprietary and confidential information refers to information that is not officially available in the public domain. Information is a valuable corporate asset and its appropriate dissemination is critical to the organisation's success. Safeguarding this information is the responsibility of all employees and representatives.

ENOC's proprietary and confidential information is to be used solely in pursuits of the Company's business interests and must not be disclosed by any employee during or subsequent to termination of the employment relationship.



Disclosure of confidential or proprietary information could seriously damage ENOC image. Our employees should be careful not to share information with others. Disclosure of information internally or externally should be shared on a "need to know" basis and for a legitimate business reason. Internal and external disclosure of information shall not violate any law, regulation, or ENOC's policies.

All requests for information from external parties should be brought to the attention of the line manager and no information should be shared until appropriate authorizations have been obtained.

Do you need more information?
Reference Document: ENOC Employment Contract and Data Classification User Manual

PERSONAL DATA AND DATA PRIVACY

We are committed to protecting the personal data of our employees and third parties. Personal data is information that can be used to uniquely identify, contact or locate an individual.

We may only process personal data for legitimate purposes as permitted or required under applicable laws and regulations. We shall not retain personal data for longer than it is needed, and we can only use it for the purpose it was originally collected for.

Personal data received from third parties is protected and used only in ways explicitly agreed. Personal data that is transferred to third parties must be appropriately safeguarded and managed in compliance with the relevant laws and regulations.

As and when required, Non-Disclosure Agreements are signed between ENOC's entities and third parties, and shall be vetted by our Group Legal Department.

Do you need more information?
Reference Documents: ENOC Group's Human Resources Policy Manual (ENOC Privacy & Data Protection Policy) and Personal Data Breach Response Policy



INTELLECTUAL PROPERTY

ENOC's Intellectual Property includes trademarks, computer programs, research products, inventions, technical reports and articles that were developed during an employees' tenure at ENOC and have a commercial value.

Utilization of ENOC's Intellectual Property (if not adequately protected) may affect ENOC's competitive advantage and can result in severe consequences. Our entities should ensure that ENOC's interests are protected from any Intellectual Property infringements. Steps should be taken to avoid infringement of the Intellectual property, including patents, trademarks and copyrights.

The Trademarks of ENOC and its various entities are valuable corporate assets which need to be used and managed properly. These assets are fragile and their protection requires collaboration and constant efforts to gain maximum value from the Trademarks and not to impair the validity or worth of the Trademarks.

ENOC's Group Communications and Group Legal are the corporate departments responsible for acquiring the registration of Trademarks for ENOC Group of Companies' products, goods and services. Our entities shall be responsible to inform both departments for their plans of new logos and other marks to be registered prior to any start of operations involving the use of such new trademark. Anyone perceiving abuse or infringement against ENOC Trademarks should promptly approach both departments so that appropriate action may be taken.

*Do you need more information?
Reference Documents: ENOC's Group Communication Policy Manual, Legal Guidance Note, and Employment Terms and Conditions.*

Information Management In Practice

Q1: What should I do if I suspect a leak of personal information related to ENOC's customers?

Please contact BE&C function to review, assess the risk involved and advise on the best course of action, via the Hotline Reporting Tools or directly to Business Ethics & Compliance team.

Q2: My manager is asking me to disclose confidential information related to my previous employer, what shall I do?

ENOC upholds the highest ethical standards and our employees should not be required to share or disclose such information.

Q3: A friend has asked me to send some contact information from our customers that I think could benefit my friend's business; is it ok to send these to my friend?

No – contact information of ENOC customers is confidential business information as well as being considered personal data. You may not share confidential business information without first obtaining internal approvals. Further, personal data is protected and can only be shared with explicit consent from the individual owner or for a legitimate purpose in compliance with the relevant laws and regulations.

05



Trust

- / Company Property
- / Use of IT and Security
- / Public Statements
- / Social Media

COMPANY PROPERTY

Every employee has the responsibility to protect our Company's property and to report any misuse. Theft, carelessness, and waste have a direct impact on ENOC's profitability.

All of ENOC's assets are to be used for legitimate Company purposes only. Any suspected incident of fraud or theft of Company property should be immediately reported through the available means of communications, such as the ENOC Ethics Hotline. The obligation of employees to protect ENOC's assets also includes the Company's proprietary information.

Do you need more information?

Reference Document: ENOC's Group Human Resources Policy Manual (Corrective Guidance Policy) and ENOC's Anti-Fraud Policy.

USE OF IT AND SECURITY

We take proactive measures to safeguard our documents, computers and other data devices that contain confidential information.

Our employees should use ENOC's information resources for responsible and authorized business purposes only. Company information should be shared only on a "need to know" basis.

Our entities should follow "clean desk" policy and all confidential information should

be kept in a secured environment. Entities should also be familiar with and follow pertinent ENOC IT policies.

IT users must keep all passwords confidential and are responsible to report any suspected security violations to their line manager, Group Information Technology Department (Cyber Security function) or Business Ethics & Compliance Function.

E-mail systems are not entirely secure and may be susceptible to interception and caution should be exercised while sending or receiving mails to/from unknown sources.

Do you need more information?

Reference Documents: Terms of Use for ENOC IT Resources and ENOC Group Cyber Security Information Security Policy Manual.

PUBLIC STATEMENTS

All media enquiries should be channeled through Group Communications Department.

It is important that we provide the public with accurate and consistent information regarding our operations, when required. Employees must not make public statements regarding issues or matters related to ENOC if they are not the authorized spokespersons.

All enquiries made by the media and/or similar parties should be channeled through the Group Communications Senior Manager or Corporate Communications Manager who will then discuss the appropriate

response with the departments or individuals concerned.

The Corporate Communications team in collaboration with the respective department will prepare the media release, or statement, according to the established corporate rules and policies and liaise directly with the media organisations involved.

Do you need more information?

Reference Documents: Group Communications Policy Manual

SOCIAL MEDIA

We encourage our employees to participate responsibly in social media to generate interest in ENOC without posing any risks to the organisation's reputation or violating the Code.

We communicate in an accurate, honest and consistent way on our official social media networking sites. All requests from ENOC's entities and departments to publish media content should be channeled through the designated Social Media Manager to maintain a clear tone of communication to all our stakeholders. ENOC's Group Communications Department will serve as advisors to all business units on various digital platforms.

We encourage our employees to use social media to promote ENOC's reputation

within the published policy & procedures framework. Our employees must be careful not to disclose confidential information or non-public information on social media or in any other public dissemination tools.

Do you need more information?

Reference Documents: Group Communications Policy Manual



Trust In Practice

Q1: One of the local newspapers approached me and requested general information about ENOC. Can I share it?

All media related enquiries should be directed to our Group Communications Department.

Q2: I use my personal social media platform to talk about my daily activities. I posted about a major change in my organisation that was not announced yet. Is that fine?

ENOC employees cannot share confidential information. This is non-compliance with Group Communications Policy Manual and ENOC's Code of Business Conduct. If you have disclosed any confidential information on social media platform, you need to raise the matter to our Group Communication Department for rectification.

Q3: I will be attending an event and shall present in the event as my capacity as an ENOC employee, do I need to get an approval to proceed?

After receiving approval from the Head of the Department, you need to contact Group Communications team for direction on what is acceptable to present prior to the event and to ensure that the employee is prepared from a media engagement point of view.

Q4: I have a Company credit card and I accidentally purchased something personal using the credit card. Can I return the item and get the money refunded without informing anyone?

Employees are responsible to use Company's property for intended business use only. In your case, you need to inform the concerned parties (line manager/ Finance Department) to advise on proper rectifying action.

06



Compliance

- / Whistleblowing
- / Anti-Fraud
- / Anti-Money Laundering
- / Anti-Corruption Compliance
- / Antitrust and Competition Laws
- / Trade Compliance and International Sanctions
- / Audits and Investigation
- / Compliance in Practice

WHISTLEBLOWING

Our employees have the right to report misconduct without fearing retaliation.

Usually the first people to realize or suspect instances of business wrongdoing or misconduct will be those who work within the organisation. We expect our employees to raise these matters even if it's just a concern. Whistleblowing refers to disclosure by an individual (referred to as the "whistleblower") of any concern about misconduct or illegal activities within the Company. The Whistleblowing Policy provides a procedure for reporting and addressing whistleblower complaints.

The objectives of the Whistleblowing Policy are to:

/ Encourage employees to raise their concerns about any unethical and/or illegal violations, business malpractices, or misconduct in the organization, at an early stage and in a proper way, so that action can be taken immediately to resolve the problem.

/ Help solve issues within the organization fairly and reasonably.

/ Minimize the organization's exposure to the damage that can occur when employees circumvent internal mechanisms and controls.

/ Protect employees from retaliation for raising concerns.

Do you need more information?

Reference Documents: ENOC's Anti-Fraud Policy, Business Ethics Committee Charter, and ENOC's Whistleblowing Policy

ANTI-FRAUD

Reporting fraud cases is the responsibility of all of us.

Our employees work hard to maintain the Company assets available to them. Assets include but not limited to money, equipment, technology and information. These are all highly valuable and are to be safeguarded and used only to pursue ENOC's business objectives. All Company assets must be protected against theft, loss or misuse. Protection of ENOC's assets is the responsibility of each employee.

All incidents reported to the Business Ethics & Compliance function regarding fraud, theft or other improper acts will be promptly investigated and, where appropriate, those responsible will be prosecuted.

Do you need more information?

Reference Documents: ENOC Anti-Fraud Policy; Business Ethics Committee Charter; and ENOC Whistleblowing Policy

ANTI-MONEY LAUNDERING

Our employees shall ensure compliance with applicable Anti-Money Laundering laws.

Money laundering is the act of concealing the source of illicit funds generated by a criminal activity such as fraud, tax evasion and drug and moved under a legitimate business to appear lawful. Our employees shall not engage in any business relationship with third parties that is suspicious and might facilitate money laundering. Potential red flags include, but are not limited to: not disclosing the identity of beneficial owners,

payments in cash, contradictory information provided by a third party, and unorthodox corporate structure, history or records.

Reference Documents: Respective Contracts and Agreements

ANTI-CORRUPTION COMPLIANCE

Bribery and corruption practices are strictly prohibited.

We prohibit our entities, representatives and employees from engaging in corruption practices, such as offering or accepting (directly or indirectly) any bribes, facilitation payments, kickbacks, pay-offs, or anything of value, with the intent to gain business or improperly influence a decision maker. All parties involved in bribery or corruption can be held liable in any jurisdiction, with criminal consequences. If you face any suspicious requests or offers regarding improper payments or anything of value, please contact the Group Legal Department or Business Ethics & Compliance function immediately.

Do you need more information?

Reference Document: Anti-Fraud Policy and Legal Guidance Note

ANTITRUST AND COMPETITION LAWS

ENOC promotes healthy competition in the marketplace.

ENOC employees shall comply with all applicable anti-trust and competition laws in every jurisdiction where our operations are conducted. In general, these laws prohibit entering into any agreement that might "restrain trade," which includes: dividing or manipulating the market, limiting production, or unlawfully refusing to sell to certain clients or purchasing from certain suppliers or restricting competition.

Should you have any doubt whether an agreement or exchange of information, or any behavior whatsoever might raise issues under applicable anti-trust and competition laws, you may contact our Group Legal Department for further advice.

Do you need more information?

Reference Document: Legal Guidance Note (Refer to Group Legal Department for additional guidance)

TRADE COMPLIANCE AND INTERNATIONAL SANCTIONS

ENOC is committed to ensuring compliance with applicable trade laws.

Being an international organization, ENOC is committed to ensuring Trade Compliance with the laws and regulations that govern commerce between countries. Trade laws restrict the import/export of goods or services across borders, and they can range from local customs laws to international agreements. International sanctions or economic embargoes may be imposed unilaterally by some countries, or multilaterally by international bodies, to prohibit trade with specific countries or persons. Many countries are also signatories to international conventions or export control treaties which restrict economic activities across borders.

ENOC employees and agents working in the sale, purchase or shipment of goods or services across national borders either within ENOC Group or between ENOC's entities and third parties, shall ensure compliance with applicable trade laws and regulations and seek internal legal advice to confirm the legality of any prospective transaction across borders.

Do you need more information?

Reference Document: Legal Guidance Note (Refer to Group Legal Department for additional guidance)

AUDITS AND INVESTIGATION (EXTERNAL, INTERNAL & GOVERNMENT)

Our employees should cooperate with external, internal and government audits/investigations

To be consistent with our internal controls, audit requirements and investigations, our auditors/investigators will conduct objective, independent examinations, taking into account high standards of business ethics, integrity and honest dealings required of ENOC and its employees.

False or misleading statements to auditors/investigators, whether internal or external, are unacceptable and full cooperation with audit/investigation reviews is the responsibility of all employees. No member of management or any other employee may interfere with or hinder the audit/investigation process.

All our employees are required to fully cooperate with any government investigation, provided ENOC is adequately represented in such investigation by its own legal counsel.

Do you need more information?

Reference Documents: Business Ethics Committee Charter and Internal Audit Charter

Compliance In Practice

Q1: I noticed my colleague is not following the procedures, just to save time and not to lose customers, what shall I do?

Inform your line manager in good faith or report it through ENOC's Ethics Hotline Reporting Tools.

Q2: My colleague is accepting bribes, but I'm afraid to report that. What should I do?

You should not be afraid to report business wrongdoing or misconduct, as reporters are protected by ENOC's Whistleblowing Policy. If you are uncomfortable to escalate the matter internally, you need to report the matter through ENOC's Ethics Hotline Reporting Tools. If you fear or encounter retaliation for reporting misconduct, you shall immediately inform Business Ethics & Compliance function.

**ENOC
CODE OF BUSINESS CONDUCT
ACKNOWLEDGEMENT**

To help ensure compliance with ENOC's Code of Business Conduct ("the Code"), we require all our employees to acknowledge their understanding and adherence to the Code.

All employees are expected to read and understand the Code and related policies, and to comply with them.

If you observe or suspect any non-compliance with the Code, you are expected to inform your line manager or the Business Ethics & Compliance function immediately. Non-compliance or violation of the Code may result in disciplinary actions, including termination.



**HOW TO CONTACT BUSINESS ETHICS
AND COMPLIANCE FUNCTION**

For any suggestions and feedback, contact the Business Ethics & Compliance function through the following reporting mechanisms:

Ethics Hotline

The Ethics Hotline facility is available for reporting offenses, complaints, unethical/illegal practices, any violation of the Code or professional standards etc.

United Arab Emirates:
800 ENOC Ethic (800 3662 38442)

Singapore:
1800 3662 222 (1800 ENOC CBC)

Turkmenistan:
+993 654 0 999 2

Saudi Arabia:
800 8500874

Worldwide:
+971 43 782 024

ENOC Ethics Hotline Whistleblowing Platform
enoc.speakup.ae

Ethics Enquiry

Employees who wish to seek clarity or have any ethics related questions may forward their enquiry at:

Ethics Enquire Line
Ethicsenquiry@enoc.com



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enoc

ETHICS HOTLINE

800 ENOC ETHIC
(800 3662 38442)
enoc.speakup.ae