



# BUSINESS CODE OF CONDUCT



# Message from NMDC Group CEO

At NMDC Group, our strength extends beyond financial achievements; it is deeply rooted in the rich diversity of experiences, perspectives, and talents that each of you brings to our collective journey.

Our zero-tolerance stance against Bribery, Corruption, and Fraud is deeply embedded in our corporate values, propelling us toward a future defined by Knowledge, Accountability, Morality, Alliance, and Leadership (KAMAL). To embody these values in our daily operations, we expect every team member to apply KAMAL principles in their decision-making processes, ensuring their actions reflect integrity and ethical conduct at all times.

As we strive for excellence, let us be mindful that each action we take not only reflects on ourselves but on the entire Group.

The foundation of our achievements lies in the steadfast commitment to ethical behavior, and every employee plays a vital role in upholding these standards and fostering the overall success of our Group. The Business Code of Conduct serves as our compass, guiding us to conduct ourselves with the utmost professionalism and integrity.

The Board of Directors and I are committed to ensuring the principles set out in our Business Code of Conduct are met throughout our daily activities and operations.

Thank you for your continued commitment to NMDC Group.

Regards,

**Eng. Yasser Nassr Zaghloul,**  
NMDC Group CEO



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# NMDC Group Core Values

Our identity is deeply anchored in the annals of Emirati seafaring history, paying homage to Ibn Majid's genius navigation tool, the "KAMAL". This symbol of precision and unity charts our course through the diverse terrains of our industries, highlighting that our commitment to excellence and innovation has roots that run deep. In Arabic, "KAMAL" means "perfection," reflecting our unwavering pursuit of excellence in everything we do.



## Knowledge

Our approach to knowledge is deep and ever evolving. We work at the forefront of the industry, always striving to know more.



## Accountability

We are accountable, reflecting our bond of trust and commitment to excellence. Our focus is being the best at what we do.



## Morality

We follow our moral compass, ensuring clarity and virtue in all our endeavors. This backbone of morality guides our every decision.



## Alliance

We take pride in forming strong partnerships with others, a testament to our belief in collaboration, partnerships, and unity.



## Leadership

The ethos with which we guide, set standards, and inspire, our leadership ensures we elevate the industry wherever we go.


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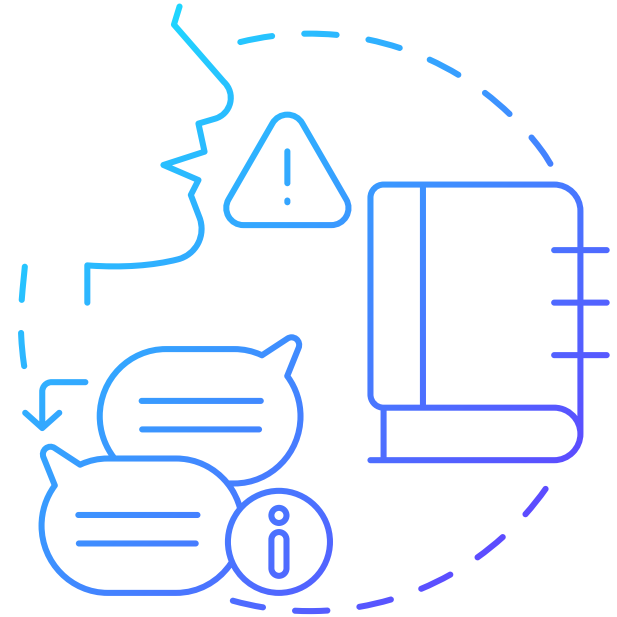
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# About the Business Code of Conduct

Our Business Code of Conduct delineates ethical principles and guidelines expected from the Board of Directors (“Directors”) and Employees by providing guidance to making ethical decisions in their day-to-day work, as well as in their interactions with External Parties and Business Partners. By promoting our core values, we secure the trust of our Employees and Stakeholders, nurturing a safe working environment where everyone is treated equitably and provided with growth opportunities.

The Business Code of Conduct is principle-based, intentionally crafted to be concise and easily comprehensible. It does not aim to be an exhaustive document for every situation but rather serves as a guide as detailed policies provide further guidance on the covered areas. Non-compliance with the Business Code of Conduct could lead to disciplinary actions including termination of employment.

In case of any uncertainty or doubt regarding the Business Code of Conduct or its associated policies, please reach out to Ethics & Compliance.

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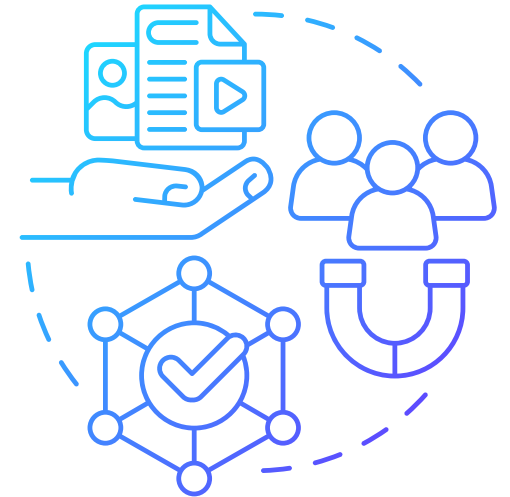
# Who Does this Business Code of Conduct Apply to

The Business Code of Conduct applies to the following:

- Anyone who works for or represents any part of NMDC Group.
- Business Partners including but not limited to clients, suppliers, dealers, subcontractors, distributors, intermediaries, or joint venture partners which are required to follow the principles set out in the Business Code of Conduct and adhere to our Business Partner Code of Conduct.
- External Parties.

## Our Compliance Program

NMDC Board of Directors sets a strong compliance culture within NMDC Group and holds the responsibility for overseeing and approving the Compliance Program. Ethics & Compliance, operating as an independent function, is tasked with the development and implementation of the Compliance Program. Regular reporting by Ethics & Compliance to the Board of Directors ensures oversight and governance of these initiatives.

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# Roles and Responsibilities of Ethics & Compliance

Ethics & Compliance plays a central role in shaping the Compliance Program for NMDC Group. This program is strategically designed to permit the identification of any instances of Bribery and Corruption, unlawful or unethical conduct and address such conduct as well as establish measures to prevent its recurrence.

## YOUR MAIN RESPONSIBILITIES

- Read, understand, and acknowledge the Business Code of Conduct.
- Comply with all internal policies, procedures, and applicable laws, as well as rules and regulations.
- Encourage a culture of compliance where everyone feels comfortable reporting a concern.
- Complete any training and required declarations relating to the Business Code of Conduct and associated policies.
- Contact Ethics & Compliance whenever you have a question or need guidance about anything mentioned in the Business Code of Conduct and its associated policies.
- Report any concern regarding any Wrongdoing such as unethical behavior and any misconduct; whether this Wrongdoing has been attempted or already occurred to Ethics & Compliance.
- Use common sense before taking any action or decision, for instance ask yourself the following questions:

- Is it compliant with the Business Code of Conduct and associated policies?
- Is it in the best interests of NMDC Group?

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If the answer is “NO”, refrain from taking the action or decision.



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# Speak Up

We all have a duty to report unethical behavior or misconduct that appears to conflict with this Business Code of Conduct and associated policies or laws and regulations.

## PRINCIPLES

- All Directors, Employees, Business Partners, and anyone can promptly report any concern regarding any Wrongdoing such as unethical behavior and any misconduct whether this Wrongdoing has been attempted or already occurred. The concern can be raised to any of the below: Direct Line Manager or Ethics & Compliance through the Speak Up channels at [ethics@nmdc-group.com](mailto:ethics@nmdc-group.com) or helpline at +971(2) 5511475.
- Disclosers should act in Good Faith and Without Malicious Intent.
- Concerns reported to Ethics & Compliance email or phone may be made anonymously.
- We are committed to protecting Whistleblowers against any retaliation and ensuring confidentiality.
- Review and investigation of reported concerns will be conducted.
- Note that Employee grievances related to performance, pay, or benefits are not covered by the Speak Up Policy and should be reported to People & Culture.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Speak Up Policy.
- Report any concerns in accordance with the Speak Up Policy.
- Maintain confidentiality and do not report any information regarding concerns to anyone within or outside NMDC Group.
- Do not retaliate against any person raising concerns.

### BE AWARE THAT

The concern raised should include the following information for a proper investigation:

- The name and contact information of the Discloser;
- Description of the Wrongdoing with sufficient detail to permit an initial investigation;
- Name(s) of the Employee(s) or other individuals, and department(s) engaging in the Wrongdoing or with knowledge of the Wrongdoing;
- Approximate or actual date(s) the Wrongdoing took place; and
- Any evidence if applicable.





# KNOWLEDGE

We empower our employees with knowledge through clear guidelines to avoid instances of Fraud, Bribery and Corruption, Money Laundering and Terrorist Financing as well as Economic Sanctions violations, and Data Protection and Privacy breaches.



-  Fraud
-  Bribery and Corruption
-  Anti-Money Laundering and Counter Terrorism Financing
-  Economic Sanctions and Trade Compliance
-  Data Protection and Privacy



# Fraud

NMDC Group upholds a zero-tolerance policy for Fraud. Legal proceedings will be initiated whenever possible, and disciplinary actions will be enforced.

## PRINCIPLES

- We strongly oppose Fraud, theft, embezzlement, and any other dishonest activities.
- Fraud is defined as any intentional act or omission, characterized by deceit, concealment, or violation of trust committed by a person or group of people within (“Corporate Fraud”) or external to NMDC Group (“External Fraud”), with the purpose of obtaining a financial or any other benefit either directly or indirectly.
- Fraud includes Corruption, misconduct, theft, breach of trust, misappropriation, willful waste, embezzlement, Bribery, intentional harm to Group property or any other illegal act which could affect the financial and/or reputational interests of NMDC Group, its shareholders or public.

### BE AWARE THAT

Fraud isn't always an internal threat. It can also manifest externally through tactics like email phishing. Fraudsters may attempt to deceive Directors and Employees by posing as trusted entities, urging them to disclose sensitive information or download malicious attachments. To mitigate this risk, it is imperative for all Directors and Employees to exercise caution and refrain from responding to unsolicited emails or clicking on suspicious attachments.



## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Fraud Control Policy.
- Refrain from engaging in fraudulent activities, theft, embezzlement, or any other dishonest activities.
- Only use NMDC Group resources, including funds, assets, intellectual property, and information for business purposes.
- Uphold integrity and honesty when exercising your duties.
- Ensure business and financial records are accurate, complete, and comply with applicable laws and regulations.
- Submit expense reports which accurately reflect the reality.
- Always be mindful that you have a responsibility to be alert for warning signs that may indicate Fraud, misrepresentation of facts, or misappropriation of assets.
- Report any concern to Ethics & Compliance.


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# Bribery and Corruption

NMDC Group enforces a zero-tolerance approach to active and passive Bribery and Corruption.

## PRINCIPLES

- We respect and comply with Anti-Bribery and Corruption laws such as but not limited to UAE Anti-Bribery and Corruption legislation Foreign Corrupt Practices Act (FCPA) and United Kingdom Bribery Act (UKBA). We also adhere to OECD principles and the U.N Convention against Corruption (UNCAC).
- Bribery and Corruption can be defined as follows:
  - Offering, as well as promising to offer, a Bribe or any Undue Advantage, whether directly or indirectly, to a Public Official, an individual, or a company, with the aim of influencing them, having them perform or refrain from performing, facilitating, expediting, or delaying an act within their duties.
  - Accepting, as well as soliciting, a Bribe or any Undue Advantage from an individual or a company in exchange for performing, refraining from performing, facilitating, expediting, or delaying an act within your duties.
- Bribery and Corruption occurs in various forms ranging from cash Bribes to job offers, commissions, or extravagant Gifts, Hospitality, and Entertainment.
- Caution is advised, particularly when dealing with Public Officials, as such interactions are subject to scrutiny by relevant authorities.
- A Facilitation Payment is a payment made to a Public Official that acts as an incentive for the official to complete some action or process expeditiously an administrative process, to the benefit of the party making the payment. NMDC Group prohibits Facilitation Payments in any form, whether made directly or indirectly. If you are approached for a Facilitation Payment, you should not agree to the request unless there is an imminent threat to your health or safety.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Anti-Bribery and Corruption Policy.
- Do not offer, promise to offer any Bribe or Undue Advantage to anyone, with the aim of obtaining any business or personal benefit.
- Do not accept, solicit any Bribe or Undue Advantage from anyone in exchange for providing any business or personal benefit.
- If approached for a Facilitation Payment, do not agree to the request unless there is an imminent threat to your health or safety.
- Report any concern to Ethics & Compliance.

### WHAT COULD HAPPEN?

During time of tender, a Business Partner could offer you a job opportunity for your Relative in exchange for influencing the decision-making process and winning the tender. In this case, you need to refuse such offer and promptly report the concern to Ethics & Compliance. This ensures transparency, upholds the commitment to fight Bribery and Corruption, and aligns with NMDC Group's corporate values and policies.



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# Anti-Money Laundering and Counter Terrorism Financing

NMDC Group maintains a firm stance against Money Laundering and Terrorist Financing, as criminals and terrorists attempt to conceal the illicit source of their funds through these activities.

## PRINCIPLES

- We comply with Anti-Money Laundering and Counter Terrorism Financing laws and regulations.
- Money Laundering refers to the process of illegally concealing the origin of illegally gained funds, typically obtained from illicit activities such as drug trafficking or Corruption by converting them into a legitimate source.
- Terrorist Financing involves the raising and processing of funds to supply terrorists with resources.
- We are committed to conducting Due Diligence as necessary, ensuring that we engage in business only with reputable and responsible Business Partners.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with Anti-Money Laundering and Counter Terrorism Financing laws and regulations, as well as any controls and policies implemented by NMDC Group.
- Conduct thorough Due Diligence on Business Partners.
- Do not engage in transactions that appear to conceal the true source of funds.
- Do not engage in transactions without proper documentation.
- Be cautious of unusual transaction patterns or unexplained sources of wealth.
- Keep proper records of all transactions.
- Report any concern to Ethics & Compliance.



### BE AWARE THAT

Every year, billions of illegal money originating from criminal activities such as Corruption, and Fraud are laundered through complex financial networks, often to finance terrorist activities. In response to this threat, several countries have implemented laws to combat Money Laundering and Terrorism Financing, requiring financial institutions and other entities to report any concern and implement effective Due Diligence in order to prevent these crimes.



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# Economic Sanctions and Trade Compliance

NMDC Group is dedicated to adhering to all applicable sanctions and trade laws principles by ensuring Trade Compliance.

## PRINCIPLES

- We are dedicated to complying with Economic Sanctions and trade laws.
- Economic Sanctions are imposed by countries and organizations to penalize companies and individuals who have trade or financial relations with certain countries, entities, or individuals.
- Countries have also implemented strict trade laws related to the import and export of goods and technology software to certain countries and end users.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Economic Sanctions and Trade Compliance Policy.
- Conduct proper Due Diligence in accordance with the Business Partner Due Diligence Policy to ensure we are not conducting business with Business Partners that are subject to sanctions.
- Whenever a transaction involves a country, entity or individual subject to Economic Sanctions, Ethics & Compliance must be duly notified.
- Do not bypass Economic Sanctions and trade laws by using intermediaries.
- Do not export or import goods, services, or technology to or from embargoed/sanctioned countries.
- Be aware of updates in Economic Sanctions lists and changes in trade laws.
- Report any concern to Ethics & Compliance.



## WHAT COULD HAPPEN?

During a Business Partner Due Diligence, you discover that an individual, Mr. A, is covered under a Sanction List. Mr. A is a key contact in a potential business deal involving the import of specialized equipment for a marine dredging project in the Middle East. In this case, you should suspend all ongoing and planned transactions involving Mr. A. Furthermore, the situation should be promptly reported to Ethics & Compliance, providing details of the discovery and any relevant information.



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# Data Protection and Privacy

NMDC Group is steadfast in its commitment to preserving the confidentiality and security of Personal Data.

## PRINCIPLES

- We uphold the confidentiality and privacy of our Directors, Employees, Business Partners as well as External Parties and comply with applicable data protection and privacy laws.
- Data protection and privacy laws encompass the actions taken to ensure that Personal Data is collected, processed, and stored in accordance with laws and regulations and to safeguard the security and integrity of the data.
- We implement adequate measures to safeguard confidential Information or Personal Data, whether in electronic or physical form.
- We refrain from disclosing or discussing any confidential information or Personal Data with unauthorized individuals.
- We collect, process, and store confidential information and Personal Data for legitimate purposes and in compliance with data protection laws.
- We ensure that Directors, Employees, Business Partners and External Parties who regularly handle personal or private information are knowledgeable about data protection laws.

## YOUR RESPONSIBILITIES

- Comply with applicable data protection and privacy laws.
- When applicable, obtain consent before collecting, processing, and storing Personal Data.
- When processing Personal Data, provide a clear understanding to the Director, Employee, Business Partner and External Party of which Data is processed, for how long it will be stored and for which purpose.
- Provide the concerned Director, Employee, Business Partner and External Party with the list of rights that can be exercised when Personal Data is either collected, processed, or stored.
- Never share personal information about a Director or Employee or Business Partner or External Party.
- Do not store Director, Employee, Business Partner or External Party Personal Data on personal devices.
- Do not use or share Director, Employee, Business Partner or External Party Personal Data for personal gain or benefits.
- Report any concern to Ethics & Compliance.

## BE AWARE THAT

Personal Data includes, but is not limited to, information such as name, date of birth, government-issued ID number, passport number, contact information, and biographical details. Any information that can be utilized to identify and describe an individual is considered as Personal Data.



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# ACCOUNTABILITY

We foster transparency in all dealings. This includes being transparent about Gifts, Hospitality, and Entertainment, avoiding Conflict of Interest, and Safeguarding NMDC Group's Assets and Resources.



-  Gifts, Hospitality and Entertainment
-  Conflict of Interest
-  Safeguarding our Assets and Resources

# Gifts, Hospitality and Entertainment

NMDC Group does not allow Gifts, Hospitality and Entertainment (GHE) of value but acknowledges that occasional GHE of negligible value can foster positive business relationships. However, such practices are only permissible as long as they adhere to NMDC Group's requirements.

## PRINCIPLES

- We permit GHE of negligible value under the condition the offering or acceptance is not made in order to obtain a business or a personal benefit. GHE of negligible value includes:
  - Gifts which the face value does not exceed AED 500 or its equivalent; and
  - Hospitality and Entertainment deemed as reasonable, occasional, provided with the intention to discuss business matters and suitable for the individuals involved.
- We consider GHE extended to Relatives and Close Personal Relationships as GHE to the Employee if provided in connection with the Employee duties.
- Employees are required to disclose any GHE using the GHE Disclosure Form available on the intranet including amounts below AED 500.
- Directors are required to disclose any GHE to other members of the Board of Directors.
- Gifts to Public Officials are formally prohibited unless permitted under the GHE Policy.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Gifts, Hospitality and Entertainment Policy.
- Never accept or offer the following:
  - Gifts of value over AED 500 or its equivalent;
  - GHE of negligible value when they are made in a manner that would breach the GHE policy or applicable Anti-Bribery and Corruption laws;
  - Cash or cash equivalents;
  - Any GHE that would harm NMDC Group's reputation if publicly reported;
  - Gifts to Public Officials except promotional Gifts with the approval from the relevant business unit Chief Executive Officer or Group Chief Executive Officer;
  - Any GHE (other than promotional) in time of tenders, contract renewals or Business Partner referencing process;
  - Any GHE from the same individual, External Party or Business Partner frequently; and
  - Any GHE for Relatives and Close Personal Relationships.
- Disclose any GHE through the GHE Disclosure Form.
- Report any concern to Ethics & Compliance.

## KEY DEFINITIONS

**Gifts:** Any type of Gift whether monetary or non-monetary offered voluntarily to an individual or group of individuals for personal use/benefit including promotional items.

**Hospitality:** Meals, beverages, accommodation and other services and amenities for individuals. Further, it includes expenses relating to hosting guests for business meetings, conferences, or other activities.

**Entertainment:** Attendance at social, cultural, and sporting events where the giver is also attending. Any invitation to an event where the giver is not attending shall be considered as a Gift.



# Conflict of Interest

NMDC Group endeavors to mitigate Conflict of Interest to prevent their escalation into illegal activities such as Corruption and Fraud.

## PRINCIPLES

- We recognize that while being in a situation of Conflict of Interest is not illegal, it can lead to unlawful actions in case an Employee prioritizes personal interests (or those of Relatives/Close Personal Relationships) or relationships over the interests of NMDC Group.
- A Conflict of Interest occurs when an Employee is involved in any situation of conflict between the interests of NMDC Group and his/her personal interests (or those of Relatives/Close Personal Relationships); and if this situation of conflict is likely to influence the way in which the Employee performs their professional duties or appears to influence the exercise of his/her duties.
- Employees are required to disclose any Conflict of Interest through the Conflict of Interest Disclosure Form available on the intranet.

## YOUR RESPONSIBILITIES

- Read, understand and comply with the Conflict of Interest Policy.
- Disclose situations that may result to a Conflict of Interest or potential Conflict of Interest to Ethics & Compliance through the Conflict of Interest Disclosure Form.
- Never do the following:
  - Conduct business as a representative of NMDC Group with an entity in which you hold a financial interest;
  - Conduct business as a representative of NMDC Group with an entity in which you hold decision-making position;
  - Engage in activities that will benefit a Competitor;
  - Use NMDC Group assets/resources to support your own personal interest or the interest of your Relatives or Close Personal Relationships;
  - Do not use NMDC Group's Inside Information for your own personal interest or for the interest of your Relative or Close Personal Relationships; and
  - Receive any Gifts, Hospitality, and Entertainment that may create or give the appearance of Conflict of Interest.
- Report any concern to Ethics & Compliance.

### BE AWARE THAT

Recommendations of candidates to People & Culture or Business Partners to relevant functions are allowed as long as you do not take part in the decision-making process and disclose your Conflict of Interest to Ethics & Compliance for their assessment and approval.


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# Safeguarding our Assets and Resources

NMDC Group acknowledges its duty of care towards the diverse range of resources and assets under its stewardship.

## PRINCIPLES

- We are committed to protecting our assets consisting of tangible resources such as buildings, cash & cash equivalents, furniture and intangible resources such as time, intellectual property rights and confidential information.
- Any information not officially available in the public domain is confidential and should be shared strictly on a need-to-know basis within NMDC Group or with authorized individuals.
- Misusing confidential information or gaining improper benefits from it is strictly prohibited.
- Intellectual property, including copyrighted documents, trademarked brands, trade secrets or proprietary processes belong to NMDC Group. Intellectual property generated by Employees belongs to NMDC Group and should be protected.
- When engaging with communities, media and government officials, only authorized Employees may speak externally. All media inquiries should be directed to the concerned department.
- Resources provided by NMDC Group to facilitate work, such as office equipment, IT infrastructure or vehicles are intended for use in the service of NMDC Group, and personal or external use is not acceptable.
- Working hours should not be diverted to other undertakings or used for personal or business benefits.

## YOUR RESPONSIBILITIES

- Understand and adhere to communication guidelines when representing NMDC Group, ensuring consistent and responsible representation.
- Effectively manage NMDC Group's assets, utilizing them judiciously, and preventing any damage, loss, or wastage.
- Safeguard the confidentiality of NMDC Group's information, recognizing it as a crucial obligation in your professional conduct.
- Be cautious during discussions involving confidential information to prevent inadvertent disclosure.
- Seek necessary permissions and implement confidentiality agreements before sharing confidential information.
- Report any concern to Ethics & Compliance.

### BE AWARE THAT

A compromise of confidential information or Personal Data can take place through:

- Misplacement or theft of physical documents, USB drives, computers, or mobile devices.
- Unauthorized access by individuals to your laptop, email account, or computer network.
- Inadvertently sending an email containing confidential information or Personal Data to an incorrect recipient.



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# MORALITY

We are steadfast in our commitment to act with morality, prioritizing Acting with Integrity, Promoting a Healthy and Safe Work Environment and preventing Insider Trading.



-  Acting with Integrity
-  Promote Healthy and Safe Work Environment
-  Insider Trading



# Acting with Integrity

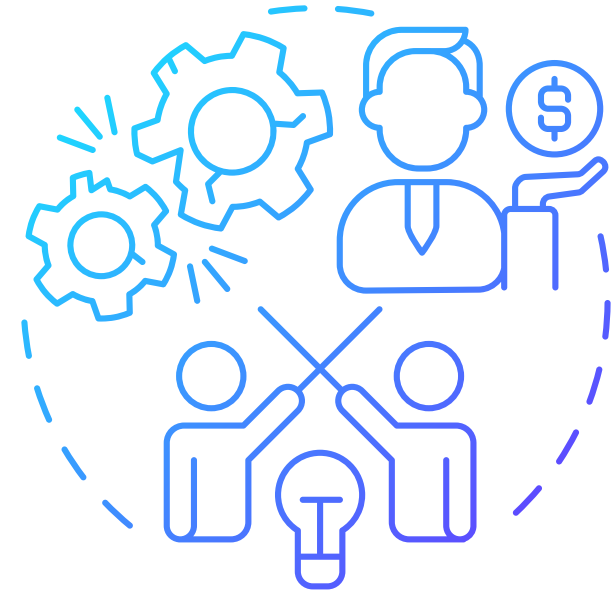
NMDC Group steadfastly upholds the principle of acting with unwavering integrity as the cornerstone of our business operations.

## PRINCIPLES

- We hold the firm belief that Integrity is foundational to our business practices and the way we interact with one another.
- Our commitment to Integrity involves subjecting every proposed action or solution to rigorous scrutiny, ensuring it aligns with the highest ethical standards.
- We emphasize the importance of considering the consequences of our actions and how they may be perceived by others before making decisions or taking actions. Our goal is to achieve the highest standards in every aspect of our operations.

## YOUR RESPONSIBILITIES

- Read, understand and comply with the Business Code of Conduct, internal policies, and applicable laws and regulations in your daily operations.
- Align your actions and communication with the ethical standards and core values of NMDC Group.
- Report any concern to Ethics & Compliance.



### REMEMBER TO

Foster teamwork and strive for excellence and professionalism in all endeavors.  
Take personal ownership to uphold ethical business conduct at all times.


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# Promote Healthy and Safe Work Environment

NMDC Group strives to protect the health and safety of all Stakeholders.

## PRINCIPLES

- We prioritize providing a healthy and safe work environment for everyone associated with NMDC Group and we have a zero-tolerance policy against any processes, attitudes, or behavior that may lead to harassment, victimization, violence, or bullying.
- Our commitment extends to fostering a workplace where all individuals are treated with dignity and respect.
- We strictly adhere to all health and safety laws, regulations, and internal policies and procedures.
- It's essential to report any incidents that could harm individuals health and safety.
- Reporting to work under the influence of alcohol, drugs, or other intoxicating substances is illegal, strictly prohibited and will result in disciplinary actions.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Business Code of Conduct, applicable health and safety laws, regulations, and internal policies and procedures.
- Act responsibly and prioritize health and safety, whether within NMDC Group premises or outside.
- Treat others with dignity and mutual respect, fostering a harmonious working environment.
- Conduct yourself in a manner that promotes equality, diversity, and inclusion, ensuring actions do not lead to unfair or discriminatory treatment of others.
- Report any accident, injury, or unsafe working conditions immediately to HSE.
- Report any concern to Ethics & Compliance.

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# Insider Trading

NMDC Group is committed to protecting the confidentiality of unpublished price-sensitive information and preventing Insider Trading. These actions undermine trust in financial markets and can result in severe financial or criminal consequences.

## PRINCIPLES

- We are committed to preserving Insider Information which refers to any information available to or obtained by an 'Insider' in relation to NMDC Group and its operations which is not available to the public and can potentially impact the prices of its shares/securities.
- Insider Trading involves trading on the stock exchange based on confidential information an Insider has or managed to obtain. It can also be done on an Insider's behalf or based on the information the Insider shared.
- We aim to provide our shareholders with accurate and regular information on NMDC Group's activities, performance and strategy.
- Engaging in Insider trading can lead to legal consequences and disciplinary actions including termination of employment.

## YOUR RESPONSIBILITIES

- Never do the following:
  - Disclose or discuss unpublished information and tipping details with individuals who do not have access to such information.
  - Participate in or encourage others to engage in trading NMDC Group's shares/securities based on unpublished information.
  - Disclose NMDC Group Insider Information for your personal interests or the interests of any other person or entity.
  - Participate or have Relatives participate in trading NMDC Group's shares/securities during blackout periods, directly or through proxies.
- Disclose any shares/securities held by you or your Relatives in NMDC Group to Ethics & Compliance if you are an Insider.
- Report any concern to Ethics & Compliance.

### BE AWARE THAT

Unpublished Information includes but is not limited to:

- Financial results.
- Declaration of bonus and dividends.
- Buy back of shares/securities.
- Information about new project.
- News of pending or proposed Mergers & Acquisitions and any other transaction impacting decision of traders.
- Cybersecurity, Data Protection or Privacy Incidents.
- Change in management.
- Gain or loss of significant Business Partners.



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# ALLIANCE

Strengthening our alliance by Treating Everyone Fairly at Work and affirming to our Stakeholders our commitment to abiding by Anti-Competitive Standards. Additionally, we conduct Due Diligence on our Business Partners to ascertain their integrity fostering an environment of trust and cooperation across our sectors.



- Treat Everyone Fairly at Work
- Know your Business Partner
- Anti-Competitive Standards

# Treat Everyone Fairly at Work

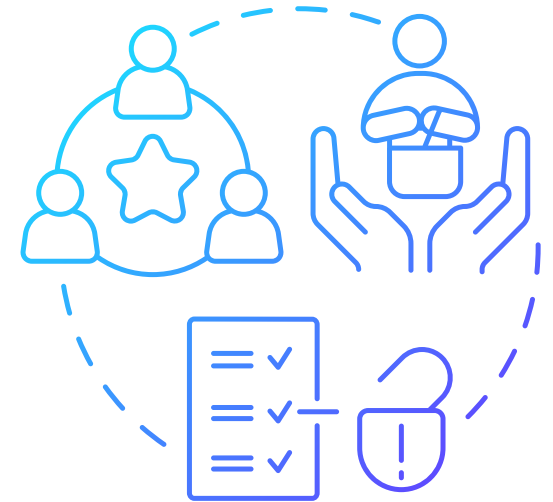
NMDC Group embraces diversity as a source of value and strength. This commitment begins in the workplace, where we prioritize treating each other with fairness and respect.

## PRINCIPLES

- We take immense pride in the diversity of our workforce. We hold deep respect for the cultural and religious differences among our Employees, fostering a workplace that is fair and free from harassment and discrimination.
- It is essential to be mindful of cultural nuances and local customs, avoiding any behavior that may be considered offensive, such as unwelcome remarks, inappropriate physical contact, or verbal abuse.
- Our commitment extends to ensuring that promotions and similar opportunities are determined by merit rather than subjective factors such as nationality, religion, gender, ethnicity, or age.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Business Code of Conduct, internal policies, and applicable laws and regulations.
- Treat each other with fairness, respect, and humility, avoiding behaviors or speech that may frighten, humiliate, belittle, or degrade others.
- Be attentive to cultural differences and local customs, steering clear of unwelcome remarks, inappropriate behavior, improper physical contact, or verbal abuse.
- Conduct yourself in a manner that aligns with the way you expect to be treated in the workplace.
- Report any harassment or discrimination to People & Culture.
- Report any concern to Ethics & Compliance.



### BE AWARE THAT

Unfair treatment is not necessarily direct and can be indirect, such as discussing work related matters in a language not understood by one of the team members.


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# Know your Business Partner

NMDC Group undertakes to avoid entering into any business relationship with persons and/or entities which carry activities that could harm NMDC Group, whether it involves (but not limited to) Bribery & Corruption, Money Laundering, Terrorist Financing, human rights laws violations or non-compliance with environmental laws and accordingly upholds a policy of zero tolerance towards such practices.

## PRINCIPLES

- We implemented a Business Code of Conduct tailored specifically for our Business Partners, known as the Business Partner Code of Conduct.
- Business Partners are required to read, understand, and comply with the Business Partner Code of Conduct.
- We adopt a risk-based approach in conducting ongoing Due Diligence on potential and current Business Partners throughout the business relationship.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Business Partner Due Diligence Policy.
- Share the Business Partner Code of Conduct with Business Partners and ensure that they read, understand, and comply with its principles.
- Always conduct Due Diligence before entering into business with Business Partners and also when there is a significant change such as but not limited to a new CEO or mergers and acquisitions operations.
- Perform regular Due Diligence on current Business Partners to keep our records up to date.
- Report any concern to Ethics & Compliance.

### WHAT COULD HAPPEN?

Due to our lack of Due Diligence, we could collaborate with a subcontractor, known for unethical practices and become blacklisted by several Business Partners as we could be associated with Bribery and Corruption.

Gaining the trust of our Business Partners may be a long road and proper Due Diligence needs to be conducted before entering into a business relationship to prevent involvement in corrupt practices and a negative impact on our reputation and business.


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# Anti-Competitive Standards

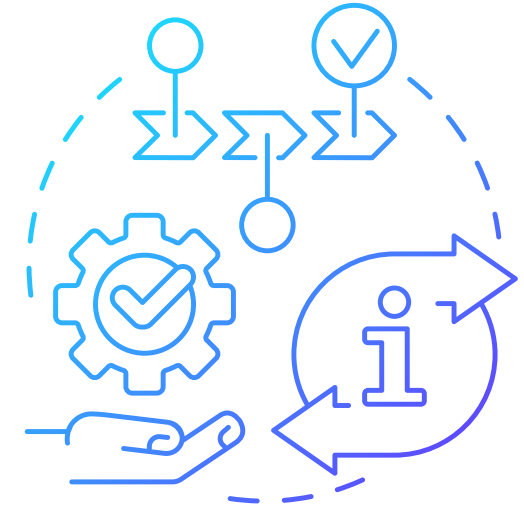
NMDC Group adheres to all relevant Antitrust Laws, which are formulated to foster fair competition and avoid anti-competitive practices.

## PRINCIPLES

- We assert that antitrust laws govern our interactions with Competitors, Business Partners and other Stakeholders to protect us from anticompetitive behavior and to create a healthy competitive environment.
- Antitrust laws specifically prohibit:
  - Agreements or concerted practices that aim at or result in the restriction of competition such as Price Fixing, Bid Rigging and Allocation or Market Sharing Agreement.
  - Abuse of a Dominant Position which refers to when an entity with power and influence in the market uses such influence or power to substantially prevent, restrict or lessen competition.
  - Exchange of confidential and commercially sensitive information.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Antitrust Policy.
- Never do the following:
  - Agree with Competitors to fix or otherwise determine the prices at which their products or services are sold;
  - Agree in advance with Competitors who will win the bid;
  - Agree with Competitors to divide up a market, usually by geographic area, client, or type of product; and
  - Exchange or agree to exchange commercially sensitive information (such as price, strategies, contract terms and conditions, costing, or other commercially sensitive data).
- Ensure that all communications with Competitors are documented, maintained, and routed through approved channels.
- Report any concern to Ethics & Compliance.



### BE AWARE THAT

Abuse of Dominant Position can manifest as:

- Agreeing to enter into exclusive purchasing requirements or non-compete clauses.
- Providing client loyalty incentives.
- Refusing to work with or supply goods and services to a certain client or group of clients.



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# LEADERSHIP

Through effective leadership, we foster a culture in tune with global priorities, with a steadfast commitment to ESG principles and to leading by example when representing NMDC Group externally during our Lobbying, Donations and Sponsorships activities and also on Social Media.



-  Environment, Social and Governance (ESG)
-  Social Media Usage
-  Lobbying, Donations and Sponsorships

# Environment, Social and Governance (ESG)

NMDC Group is dedicated to making a positive impact on the environment, communities, and society within our operational areas. Our commitment extends to integrating Environmental, Social, and Governance (ESG) practices across all operations, with a focus on transparent reporting and disclosure of our non-financial performance.

## PRINCIPLES

- We actively measure, monitor, and report our environmental impact, encompassing greenhouse emissions, energy usage, waste generation, and other pertinent environmental metrics to enhance sustainability.
- Our commitment includes strict adherence to relevant rules, regulations, and industry standards regarding ESG reporting.
- In our engagement with society, we carefully understand and assess the needs and aspirations of local communities, aiming to contribute to their well-being and development.
- We actively support philanthropic and charitable activities that address social issues and contribute to the welfare of societies.
- We take a firm stance against child labor, forced labor, human trafficking, and any form of modern slavery. We ensure commitment and do not engage in or support such unethical practices.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the applicable rules, regulations, and industry standards related to ESG reporting to ensure accurate and transparent disclosure of our non-financial performance.
- Demonstrate respect for, engagement with, and support to the local communities where our operations are based, considering their needs and aspirations to contribute to their well-being and development.
- When entering contracts with manpower suppliers, ensure the inclusion of clauses explicitly prohibiting human right abuses, including child labor, forced labor, human trafficking, and any form of modern slavery.
- Report any concern to Ethics & Compliance.


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# Social Media Usage

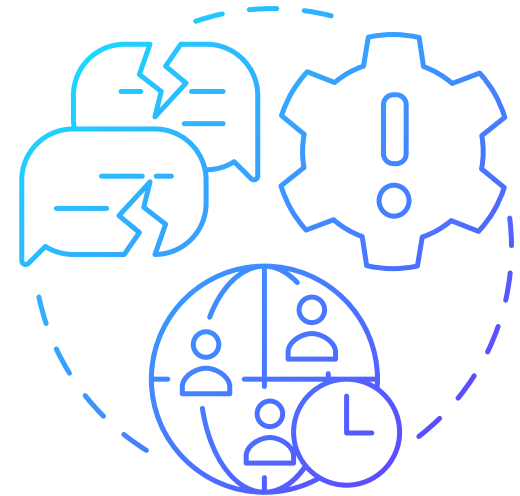
NMDC Group recognizes the importance of representing NMDC Group positively while engaging in social media activities. Social media platforms such as LinkedIn and others offer valuable opportunities for networking, communication and branding.

## PRINCIPLES

- As we represent NMDC Group to the outside world, we should be vigilant regarding the use of social media, specifically when and how to associate your connection with NMDC Group.
- Only authorized Employees have the right to share information about NMDC Group externally.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the social media guidelines while using social media platforms.
- Be professional, respectful, and considerate while using social media in a professional capacity when identified as an Employee and acting on behalf of NMDC Group.
- Never do the following:
  - Reveal confidential information about NMDC Group or our Business Partners or our External Parties;
  - Post false or misleading information about NMDC Group or our Business Partners or our External Parties;
  - Post inappropriate content or engage in discussions about sensitive topics;
  - Comment on behalf of NMDC Group or in a way that gives the impression that you are doing so on behalf of NMDC Group unless you have proper authority to do so; and
  - Engage in activities that could breach legal or regulatory requirements.
- Report any concern to Ethics & Compliance.



# Lobbying, Donations and Sponsorships

NMDC Group advocates for responsible Lobbying, Charitable Donations and Contributions, and Sponsorships aligned with NMDC Group's best interests.

## PRINCIPLES

- We prohibit Directors and Employees from making any Donations or Contributions in cash or in kind, directly or indirectly, to any political party, government agency or any person for political purposes on behalf of NMDC Group.
- Donations and Contributions for charitable purposes are allowed and made by NMDC Group to non-profit entities dedicated to social, environmental, or humanitarian causes.
- Sponsorship is permissible and refers to any situation where NMDC Group or anyone acting on its behalf supports an event, activity, person, or organization financially or through the provision of goods or services in exchange for the opportunity to be associated with a project or program.
- Lobbying is authorized and can be understood as the responsible oral or written communication with a public official to influence legislation, policy or administrative decisions with the approval of NMDC Group's management in order to protect NMDC Group's interests and to align with new/positive developments locally and globally in NMDC Group's areas of operation.
- All Lobbying activities, Donations and Sponsorships shall be permissible under law, aligned with the Business Code of Conduct and shall not create the appearance of Bribery and Corruption or any other unethical conduct.

## YOUR RESPONSIBILITIES

- Read, understand, and comply with the Anti-Bribery and Corruption Policy.
- Do not make any Donations or Contributions to any political party, government agency or any person for political purposes on behalf of NMDC Group.
- Ensure proper Due Diligence has been conducted on external parties before making any Donations, Contributions or Sponsorship.
- Do not engage in Lobbying activities unless you are listed as an authorized person by NMDC Group.
- Report any concern to Ethics & Compliance.

### BE AWARE THAT

Each Lobbying activity should be properly recorded, documented and includes at least the following information:

- Who is being Lobbied;
- What are the issues involved in the Lobbying;
- What is the intended result of the Lobbying; and
- What is the extent of the Lobbying activities.


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# Glossary

**NMDC Group** refers to NMDC along with every entity wherein NMDC (i) exercises direct or indirect control over fifty percent (50%) or more of the share capital, or (ii) holds less than fifty percent (50%) of the share capital but possesses, directly or indirectly, the authority to steer or influence the management and strategic decisions. This influence may stem from share ownership, contractual arrangements, or other means of control.

**Abuse of a Dominant Position** refers to when an entity with power and influence in the market uses such influence or power to substantially prevent, restrict or lessen competition.

**Allocation or Market Sharing Agreement** is an agreement between Competitors to divide the market among themselves by agreeing not to compete for each other's clients, or not to enter or expand into a Competitor's market. Allocation or Market Sharing Agreement not only involves allocating a geographical location but also includes allocation of the sale or supply of specific products/services or particulars clients or class of clients.

**Bid Rigging** is a Fraudulent scheme in procurement auctions where two or more people who were expected to compete against each other mutually agree not to bid against each other by raising or lowering the quality of products, services or commodities.

**Bribery and Corruption** can be defined as follows:

- Offering as well as promising to offer a Bribe or any Undue Advantage, whether directly or indirectly to a public official, an individual, or a company, with the aim of influencing them, having them perform or refrain from performing, facilitating, expediting or delaying an act within their duties.
- Accepting as well as soliciting a Bribe or any Undue Advantage from an individual or a company in exchange for performing, refraining from performing, facilitating, expediting or delaying, an act within your duties.



**Business Partner** refers to any party with which NMDC Group is conducting business or acting on behalf of NMDC Group including but not limited to clients, suppliers, dealers, subcontractors, distributors, intermediaries or joint venture partners.

**Close Personal Relationships** includes social or business relationships that the Employee maintains outside of work including colleagues and Business Partners.

**Competitor** is a person or a company that competes with NMDC Group by offering equivalent goods and services. One should note that Business Partners can also be regarded as Competitors in certain cases.

**Conflict of Interest** occurs when a Director or Employee is involved in any situation of conflict between the interests of NMDC Group and his/her personal interests (or those of close relationships); and if this situation of conflict is likely to influence the way in which the Director or Employee performs professional duties or appear to influence the independent and impartial exercise of his/her duties.

**Contributions** are Gifts that are not quantifiable, such as time or talents, provided in support of a cause.

**Director** refers to any member of the Board of Directors including the Chairman.

**Discloser** refers to Employees, Business Partners and anyone who reports any Wrongdoing.

**Donations** refer to quantifiable Gifts, such as financial payments, given to a nonprofit entity.

**Due Diligence** is a process to review the integrity of potential and current Business Partners and External Parties regarding but not limited to Bribery & Corruption in order to categorize them into risk profiles and thus apply appropriate measures to mitigate the risks, if there are any.

**Economic Sanctions** are commercial and financial penalties applied by states or institutions against states, groups, or individuals.

**Employee** means any person, who has agreed to be employed to work for some form of payment, whether being on the payroll, or not including those on deputation, contract, temporary, probationer, apprentice, trainee, part time employees / workers, full time consultants, holding permanent, honorary, ad hoc, voluntary or short-term positions but also officers, outsourced employees and secondees.

**Entertainment** refers to attendance at social, cultural and sporting events where the giver is also attending. Any invitation to an event where the giver is not attending shall be considered as a Gift.

**Ethics & Compliance** is an independent function that is responsible for the implementation and effectiveness of the Ethics & Compliance Program at NMDC Group.

**External Party** refers to any entity or individual which is not categorized as a Business Partner.

**Facilitation Payment** is a payment made to a Public Official that acts as an incentive for the official to complete some action or process expeditiously, to the benefit of the party making the payment.



**Fraud** is defined as any intentional act or omission, characterized by deceit, concealment, or violation of trust committed by a person or group of persons within (“Corporate Fraud”) or external to NMDC Group (“External Fraud”), with the purpose of obtaining a financial or any other benefit either directly or indirectly.

**Gifts** refers to any type of Gift whether monetary or non-monetary offered voluntarily to an individual or group of individuals for personal use/benefit including promotional items.

**Good Faith** is assumed if the Discloser has reasonable grounds for believing that the information reported potentially indicates a Wrongdoing.

**Hospitality** includes meals, beverages, accommodation and other services and amenities for individuals. Further, it includes expenses relating to hosting guests for business meetings, conferences, or other activities.

**Insider** is an individual who has nonpublic information about NMDC Group due to their position or intimate association with NMDC Group.

**Insider Information** refers to any information obtained by an Insider which is not available to the public and can potentially impact the prices of shares/securities.

**Lobbying** is authorized and can be understood as the responsible oral or written communication with a Public Official to influence legislation, policy or administrative decisions with the approval of NMDC Group’s management in order to protect NMDC Group’s interests and to align with new/positive developments locally and globally in NMDC Group’s areas of operation.

**Money Laundering** refers to the process of illegally concealing the origin of illegally gained funds, typically obtained from illicit activities such as drug trafficking or Corruption by converting them into a legitimate source. This can be done through several methods, such as using the money in legitimate transactions.

**Personal Data** includes, but is not limited to, information such as name, date of birth, government-issued ID number, passport number, contact information, and biographical details. Any information that can be utilized to identify and describe an individual is considered as Personal Data.

**Price Fixing** is an anticompetitive agreement between Competitors operating within a market to buy or sell a product, service or commodity at a fixed price, or maintain the market condition in a manner to maintain the agreed price for a specific product, service or commodity by controlling demand and supply.

**Public Officials** includes:

- Individuals who hold a legislative, administrative or judicial office (either appointed or elected);
- Any person exercising a public agency or a public enterprise (e.g. a state-owned enterprise);
- Any official or agent of a public international organization;
- Any political party, political party official or political party employee;
- Any royal or ruling family member; and
- Any agent or representative of any of those persons listed above.





**Relatives** includes any person related by blood or marriage.

**Sponsorship** is permissible and refers to any situation where NMDC Group or anyone acting on its behalf supports an event, activity, person, or organization financially or through the provision of goods or services in exchange for the right to be associated with a project or program.

**Stakeholders** includes customers, Employees, shareholders, partners, vendors, regulatory bodies, and the broader community.

**Terrorist Financing** involves the raising and processing of funds to supply terrorists with resources.

**Trade Compliance** encompasses all of an organization's processes and procedures that ensure it complies with domestic and international trade rules, regulations, and laws. It includes interrelated concepts like import compliance, export compliance, and import and export controls.

**Undue Advantage** may be defined as an advantage which is not authorized by law or contract and/or could not be obtained through lawful or proper means.

**Whistleblower** refers to a Discloser who reports any Wrongdoing in Good Faith and Without Malicious Intent.

**Without Malicious Intent** means the Discloser reports the Wrongdoing without any intent to obtain personal benefit including direct financial consideration.

**Wrongdoing** refers to unethical behavior and any misconduct; whether this Wrongdoing has been attempted or already occurred.

Unless the context of this Policy otherwise clearly requires, reference to the plural includes the singular and vice versa. Any reference to "including" or "includes" means "including" (or includes) without limitation.





### Awareness and declaration

All NMDC Group Directors and Employees are required to read, understand and acknowledge the Business Code of Conduct undertaking that they will comply with the principles set out in the Business Code of Conduct.

### Guidance

In case of any question or doubt relating to the Business Code of Conduct and its associated policies, reach out to Ethics & Compliance through the Speak Up channels at [ethics@nmdc-group.com](mailto:ethics@nmdc-group.com) or helpline at [+971\(2\) 5511475](tel:+97125511475).



### Disciplinary actions

Any Wrongdoing such as unethical behavior and any misconduct; whether this Wrongdoing has been attempted or already occurred would lead to disciplinary actions as per NMDC Group Policies and People & Culture Disciplinary Manual.

### Business Code of Conduct review

Ethics & Compliance shall review the Business Code of Conduct as and when required and propose modifications and updates as deemed necessary. This document shall not be reproduced in any means without prior confirmation from Ethics & Compliance.



# Business Code of Conduct Review

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Ethics & Compliance shall review the Business Code of Conduct as and when required and propose modifications and updates as deemed necessary. This document shall not be reproduced in any means without prior confirmation from Ethics & Compliance.

## REVISION HISTORY

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Revision No.: 1

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