



**TROJAN**  
CONSTRUCTION GROUP

**CODE OF CONDUCT  
AND BUSINESS  
ETHICS POLICY**

## Code of Conduct and Business Ethics Policy

### Introduction

The Code of Conduct and Business Ethics Policy (the Policy) outlines guidelines of Trojan Construction Group – Sole Proprietorship LLC (TCG) and its subsidiaries (henceforth referred to as the Group) on honest and ethical conduct.

### Scope

This Policy applies to TCG, and its subsidiaries that do not have existing related policies suitable to their operations. The Policy applies to all areas of the Group's business operations, covering all directors, executives, and employees working for or on behalf of the Group. It also extends to outsourced or seconded employees working exclusively for or on behalf of the Group. The Policy also applies to its external parties working at its premises. The Group encourages these external parties to adopt similar policies in line with the Group's Supplier Code of Conduct.

### Policy Statement

TCG adopts standards of honest and ethical conduct aligned with its core values. The following principles do not address every legal or ethical issue that individuals may face but are intended to provide guidance in acting ethically.

#### *Anti-bribery and Anti-corruption*

TCG prohibits bribery and corruption, including facilitation payments. Individuals must not:

1. provide and commit or permit others to provide and commit any form of valuable consideration, whether directly or indirectly, to any entity or individual with the intent of securing inappropriate commercial advantage; and
2. accept, solicit, or consent to the acceptance of any form of valuable consideration that results or may result in inappropriately influencing the individuals' responsibilities in the company.

"Bribery" means the direct or indirect offering, promising, giving, or soliciting anything of value including any financial or other advantage to improperly influence any act, inaction or decision of any person, including any government official or any director, officer, employee, agent or representative of any commercial organization, whether public or private. "Corruption" is the misuse of office or a business position for personal or private gain. "Facilitation payments" is a small payment made to secure or speed up routine legal or government actions.

#### *Anti-money laundering*

TCG complies with Anti-money Laundering (AML) laws and regulations in locations where TCG operates to combat money laundering.

#### *Gifts, Honorarium, Meals, Entertainment or Hospitality*

The accepting or giving of gifts is strongly discouraged and frowned upon at TCG. However, TCG makes allowances for cultural context and sensitivities and as such makes allowance that gifts, honorarium, entertainment, and other hospitality may be given or accepted when appropriate and reasonable to the circumstances and local environment, frequency, and quantity, provided that internal requirements on this subject are met. This is only permitted for gifts that are neither so frequent nor so generous as to appear excessive.

#### *Anti-trust and Fair Dealing*

TCG believes in fair competition and complies with applicable antitrust and fair dealings laws in locations where ADH operates.

#### *Political Contributions or Donations*

Political and / or charitable contributions or donation on behalf of TCG in any of the locations where TCG operates may be made only with the pre-approval of TCG's Managing Director (MD) subject to special resolution at the General Assembly at Alpha Dhabi Holding PJSC (henceforth referred to as ADH), the parent company.

#### *Substance Abuse*

TCG prohibits the possession, sale, purchase, delivery, use or transfer of illegal substances (except medically prescribed drugs) in its premises.

#### *Health & Safety*

TCG works to create a safe, healthy, and environmentally friendly workplace, in accordance with local environmental, safety and health standards in locations where TCG operates. TCG strives to eliminate workplace accidents, occupational injuries, and workplace illnesses by working with its facility management service providers. TCG endeavours to implement monitoring of local environmental, safety and health standard guidelines to ensure deterrence of accidents and hazards.

#### *Accounting and Reporting*

TCG maintains business records in accordance with applicable laws and regulations in locations where TCG operates. TCG prohibits the entry of false entries into its records or accounts for any reason.

#### *Conflicts of Interest*

TCG endeavours to avoid conflicts of interest and ensures compliance with applicable laws and regulations in locations where TCG operates. Conflicts of interest (actual or potential) arise in organizations where an interest or activity influences or appears to influence the ability of an individual to exercise objectivity or impairs the individual's ability to perform his or her responsibilities in the best interests of the company.

#### *Insider Information*

TCG treats confidential information with due care and in accordance with laws and regulations in locations where TCG operates. TCG takes appropriate measures so that confidential information acquired by individuals during their work for or on behalf of TCG is not disclosed to anyone not employed or engaged by TCG, or to anyone who does not require the information for their normal work activities. If this information pertains to TCG or any other publicly traded company, is not generally available and would be likely to have an effect on an individual's decision to invest or sell shares in that company then the disclosure of this information and any subsequent dealing could amount to "insider trading". ADH's Board of Directors has formed a committee to manage, follow up and observe the transactions of insiders, maintain their register, and submit statements and periodic reports to the Abu Dhabi Securities Exchange (ADX).

#### *Use and Protection of Company Assets and Resources*

TCG ensures responsible protection and use of company assets and resources. TCG's assets include physical assets, such as equipment and buildings, as well as its funds, intellectual property, trade secrets and confidential information. TCG's resources include, but are not limited to, cash, personnel, equipment, laptop, handheld device, office infrastructure such as email identifier, internet, and vehicles.

#### *Privacy and Data Protection*

TCG acknowledges the importance of data ethics and respects every individual's right to protect personal data. TCG has a Privacy and Data Security Policy which describes guidelines specific to this subject.

### *Human Rights*

TCG supports and respects internationally proclaimed human rights as defined by the International Labour Organization (ILO) conventions. TCG does not tolerate child labour, forced and compulsory labour acquired through modern slavery or human trafficking, discrimination, harassment, or abuse. TCG subscribes to fair compensation and working conditions according to laws and regulations in locations where TCG operates. TCG has a Human Rights Policy which describes guidelines specific to this subject.

### *Responsible Communications*

TCG prohibits making knowingly false or misleading statements or claims about its services. TCG prohibits the dissemination of data, declaration or information known to be untrue and that affect the market value of securities and the investor's decision to invest in such securities or otherwise.

### *Responsible Procurement*

In selecting suppliers, TCG strives to find the balance between building long-term supply relationships based on the compatibility of values and behaviour, while considering quality and price. TCG considers local suppliers, where possible, in support of local governmental initiatives.

### **Stakeholder Engagement**

TCG fosters relationships with stakeholders to better understand ethical conduct concerns and endeavours to integrate such considerations into this Policy.

### **Training and Awareness**

TCG promotes the training and development of its employees to empower them with the knowledge and skills they need to uphold honesty and ethical conduct. TCG further promotes awareness and an understanding, amongst employees, of how honesty and ethical conduct impact its operations and how the company's operations impact stakeholders.

### **Compliance**

TCG complies with the applicable laws and regulations of the UAE and/or the laws and regulations of the host country of its operations. For the avoidance of doubt, subsidiaries registered and operating in countries other than the UAE are mandated to adhere to the laws of the host country in addition to the applicable laws of the UAE. TCG remains unequivocally compliant with UAE laws.

### **Roles and Responsibilities**

In general, all employees should uphold principles as set forth in this Policy.

### **Reporting and Transparency**

TCG encourages stakeholders to report concerns, suspicions, or potential violations of this Policy.

### **Policy Review**

TCG Group believes in continually improving its performance for the activities it undertakes or services it provides. The Group will review this Policy annually, or sooner if required, and revise this to ensure it remains up-to-date and aligned with the company's Mission, Vision, core values, laws, and regulations of the UAE and/or host country of its operations, and with global best practices. The Group shall make available on the appropriate channels any changes to this Policy, and every version will have an updated effective date. Stakeholders are advised to refer to the Group's official channels for the most recent Policy.

A subsidiary of Alpha Dhabi Holding. This Policy was last reviewed in November 2023.