



**Title:** KOJ Code of Conduct

### **Procedures & Forms**

HR Policies and Procedures

### **Effective Date:**

This version supersedes all previous policy and practices related to Code of Conduct. This policy is effective from the 1<sup>st</sup> December 2014

### **Background**

At Kamal Osman Jamjoom Group LLC (KOJ) we try to operate our business in a fair and ethical way. We start by recruiting people with strong potential, and aim to develop their skills and capabilities over the long term. As a result, we have many key team members who have been with us for ten, fifteen and twenty years. A number of people who have started in entry level positions are now in very senior positions. We want to operate our business in an honest and straightforward way, ensuring not only that our business is well looked after, but also our people, customers and suppliers.

We have developed three key values that we try to abide by everyday:

- Good People First
- Start and End with Customer Service
- Ensure Profitability for all Stakeholders

### **Policies and Procedures**

We like to offer a safe, supportive and productive work place for all our employees. This can only be achieved when we all work towards the same goals and to the same standards. Our teams are made up of good people of many different nationalities, cultures and backgrounds, and therefore having a set of standard guidelines is important.

This code of conduct is a summary of what we believe is important. It is really only a brief summary - more information can be found by referring to the KOJ HR Policies and Procedures manual or online on the KOJ HR website.

Below are some standards which we all try to stick to:

#### Time and attendance

We are all paid a salary in return for working our agreed hours. This means that it is very important that we start and finish work on time; being late to work or leaving early is disrespectful to the company and to our fellow team members who may rely on us for support at work.

We should also account for any periods away from our work. If we have to be away from work, either on business, on annual leave or due to sickness, then we need to follow the correct procedures, always letting HR know the reason for the absence.

#### General standards of behaviour

Although we all do different jobs, and may have different levels of responsibility, we should never think that we are in some way "better" than anyone else. Each person plays an important role in the life of the company, whether it is the cleaner, the coffee person or a senior manager, and we should respect that individual for their contribution. We should be polite at all times and should never use threatening or abusive language towards a fellow employee. It should go without saying that we should never be physically abusive to a fellow team member.

We should always respect the standards of the country that we work in and also the company's standard. So we should always wear clothing that conforms to the standards set by the company.

#### Sticking to the laws of the country

We need to ensure that we abide with the laws of the country and the company's internal rules:

- We always need to look after company property, and avoid wilfully damaging, or stealing property which belongs to fellow employees or the company

- We should always come to work in a fit state, and avoid being under the influence of alcohol or any drug, or bringing alcoholic beverages or drugs on to company property
- We should always stick to high standards, and avoid violating the national laws of the country where we are employed
- We should be aware of risks to health and safety, and avoid smoking in a no smoking area
- We should always follow health and safety procedures, especially fire protection regulations

#### Creating a culture of open and honest communication

Everyone should feel comfortable to speak their mind, particularly with respect to ethical concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit when everyone works to prevent mistakes or wrongdoing by asking the right questions at the right time. Creation of this culture, allows us to protect our people and our company from anyone who may cause them harm.

#### Avoiding conflicts of interest

To ensure KOJ is able to protect its good people we must avoid any relationship or activity that can impact fairness across the organisation. At times, we may be faced with situations where business interests may conflict with our own personal or family interests, because the course of action that is best for us personally may not also be the best course of action for KOJ. We must ensure we never use KOJ property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with the company.

Here are some other ways in which conflict of interest could arise:

- Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with us.
- Hiring or supervising family members or closely related persons.
- Serving as a board member or advisor for an outside commercial company or organization.
- Owning or having a substantial interest in a competitor, supplier or contractor.
- Having a personal interest, financial interest or potential gain in any Kamal Osman Jamjoom Group LLC transaction.
- Placing company business with a firm owned or controlled by yourself, your family or a close friend, or his or her family.
- Accepting gifts, discounts, favours or services from a customer/potential customer, competitor or supplier, unless equally available to all of our employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review and written approval from their managers or the HR department.

#### Personal Harassment

One of our core beliefs is that our good people should have a comfortable working environment. To protect our people we have a zero tolerance policy with respect to any form of harassment. Any form is strictly prohibited and may be grounds for termination, with immediate dismissal for just cause without notice, pay in lieu of notice or end of service.

Personal harassment means any conduct whether verbal or physical that is discriminating in nature, based upon another person's race, colour, ancestry, place of origin, political beliefs, religion, marital status, physical or mental disability, sex, age or sexual orientation. This includes any discriminatory behaviour directed at an individual that is unwanted or unwelcome, and causes substantial distress in that person, or creates a poor working environment for our people.

Sexual harassment is any conduct, comment, gesture or contact of a sexual nature that would be unwanted or unwelcome by any individual, or that might, on reasonable grounds, be perceived by that individual as placing a condition of a sexual nature on any job offer or career development.

Standards differ by country and culture, so it is very important that we all respect the standards of the company.

#### Gifts

Employees may not accept money of any amount from companies or people with whom the group does or may do business.

Non-monetary gifts that have a market value greater than 200 AED/SAR may not be accepted unless written approval is obtained from management.

However employees may accept unsolicited gifts, other than money, worth less than 200 AED/SAR that conform to reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets, chocolate boxes and other modest presents that commemorate a special occasion.
- Calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Employees with questions about accepting business gifts should talk to their managers or the HR department.

#### Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately extravagant or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future or who wants to win a new contract.
- The employee accepting the business courtesy should not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by other members of the company.

#### Product Testing from Brands

Company products must not be given to members of the team except for specific reasons:

- Testing and research - at times we may require people to test items that we intend to produce and sell in our stores. All items used in testing and full details of the person conducting the testing must be recorded. In all cases a detailed record of feedback for each item must be maintained by the brand – to demonstrate the value that the trial has added to the item before final production was commenced.
- Team motivation – there may be instances where products may be gifted to team members as a motivational program – eg new launches to store staff hitting targets. Such programs need to be properly documented and approved by management.

Samples created in the course of new product development remain company property and should not be taken by team members for personal use. The same applies to competitor samples bought during product development. The correct method of disposing of samples is through company sample sales, which need to be approved by internal audit. All proceeds of company sample sales go towards the company Emergency Fund.

#### Confidential and Proprietary Information

An integral part of the groups' business success is our protection of confidential company information, as well as non-public information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or non-public information about other companies, including current or potential suppliers. We will not disclose confidential and non-public information without a valid business purpose and proper written authorization.

Use of Company Resources Company resources, including time, material, equipment and information, are intended for company business use only. Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity. We will not solicit contributions nor distribute non-work related materials during working hours.

In order to protect the interests of the groups' network and our fellow employees, KOJ reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, including the use of the Internet or intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

#### Media Inquiries

Kamal Osman Jamjoom Group LLC is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Group HR Director based in Dubai for corporate queries, or the Brand Marketing Manager for any brand related queries. No one may issue a press release or talk to the media without first consulting with the Group HR Director.

**Hesham Mutahar Omar Al-Amodi**

Group CEO

Date:

**Ian Scott Halliwell**

Deputy CEO - Support Services

Date: