

Code of Conduct

Khazna's Code of Conduct (Code) is at the heart of the Compliance Program (Program). It sets out Khazna's policy on lawful and ethical business conduct, reflecting our commitment both internally and externally, to act with integrity. Our Program promotes awareness and understanding of Khazna's ethical values, ensuring all employees are clear on their responsibilities. The Program represents a top-down commitment to:

- (i) Improve Khazna's business opportunities and sustainability (ii) Protect and enhance the company's reputation (iii) Increase third-party confidence in our ability to deliver with integrity (iv) Minimize the risk of non-compliance with local and international laws (v) Effectively and efficiently manage compliance risks

Khazna's Code of Conduct

The Code sets out Khazna's: (i) Principles, (ii) Standards of professional conduct, (iii) Ethical behavior and (iv) Commitment to ensure compliance with local and international trade control laws.

Scope

The Code applies to all employees across the Khazna Group. A separate Supplier Code of Conduct outlines expectations for third-party partners.

Accountability

Khazna expects high standards of integrity along with professional and personal behaviors from its employees which align with Khazna's reputation and protects its interests. If your conduct violates this Code, you may be subject to disciplinary action.

Code of Conduct: Your Responsibilities

Our Code sets out the following seven key responsibilities:

1. Prevent Bribery and Corruption

Khazna adopts a zero-tolerance approach to any form of bribery or corruption. Our Anti-Bribery and Corruption Policy provides guidelines on our approach to conducting business in a lawful and ethical manner. All employees are expected to comply with applicable anti-bribery and corruption laws.

2. Manage and Protect Confidential Information

All information related to Khazna is considered confidential. Our internal policies offer clear guidance on how to manage and protect such information. Employees must not disclose, share, or use Khazna's confidential information except as part of their official duties, and never for personal gain, whether for themselves or others. Care must be taken during conversations and when posting on social media to avoid unintentional disclosure. Leaking confidential information can cause serious harm to Khazna's reputation. Any information acquired during your employment about Khazna, its customers, suppliers, business partners, or fellow employees must be treated with strict confidentiality, both during your tenure and after your departure.

3. Avoid Conflicts of Interest

Employees should avoid situations that could create actual or perceived conflicts of interest, as these may compromise their judgment in fulfilling their responsibilities on behalf of Khazna. The Conflict of Interest Policy outlines clear guidelines for identifying and managing such situations. Conflicts of interest may arise in cases such as: (i) when an employee has a financial interest that could influence their decision-making (ii) when personal benefit is gained through access to confidential information (iii) when a position at Khazna is misused for personal advantage (iv) when there is a personal interest, direct or indirect in any of Khazna's business partners. Employees are required to declare conflicts of interest in writing.

4. Protect Khazna Data

Our Company Policies outline clear guidance on how to protect and manage Company data. Employees

must ensure that any proprietary or confidential information cannot be accessed by unauthorized people and that sensitive information is only discussed with people who are authorized to have access to it.

5. Declare Gifts and Entertainment (G&E)

Employees must report any offers, receipt of gifts or hospitality exceeding 400 AED. All sponsored travel must be approved in advance. Khazna's Gift, Entertainment, Sponsored Travel and Hospitality Policy outlines the relevant procedures and guidelines. Gifts and entertainment between colleagues do not need to be declared. (1)

6. Protect Insider Information

Insider information is confidential, and its disclosure is strictly prohibited. Employees must not use non-public information obtained during their employment at Khazna for personal benefit or to benefit others. Khazna's Insider Information Policy outlines the standards for trading or enabling others to trade while in possession of Insider Information.

7. Comply with International Trade Sanctions and Control Laws

As a global organization, Khazna is required to comply with international trade sanctions and export control laws. Khazna's Sanctions and Export Control Policy sets out clear guidelines to ensure we do not engage in transactions or business activities that violate applicable regulations.

Khazna Reporting Channels

Employees are encouraged to raise concerns, in confidence, regarding misconduct or unethical behavior, breaches of law, regulations, fraud or other similar acts by using the following reporting channels:

1. Khazna Speak-UP
2. Speak-UP helpline 8000120361
3. ethicsandcompliance@khazna.ae
4. Your line manager



Contact information

If you have any questions regarding this code please contact ethicsandcompliance@khazna.ae

(1) Special threshold applies for G&E offered or received to/by Khazna's Leadership and G&E involving Public Officials