



Aldar Group

Aldar Group Anti-Bribery and Corruption Policy Manual

Instrument Information

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Instrument History

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A. INTRODUCTION

1. TITLE

- 1.1. This Instrument is entitled the Aldar Group Anti-Bribery and Corruption Policy (“the Policy”).

2. PURPOSE

- 2.1. Aldar Properties PJSC (“Company” or “Aldar”) and its subsidiaries is committed to ensuring that it and all entities owned by it (“Aldar Group” or “Group”) act lawfully, ethically and with integrity in all business dealings and ensuring full compliance with all relevant Anti-Bribery and Corruption (“AB&C”) laws and requirements.
- 2.2. The Policy sets out the principal policy requirements in relation to bribery, corruption and serves as a framework to understand the Group’s approach to managing instances of potential bribery and corruption.

3. GOVERNING INSTRUMENT

- 3.1. The Policy outlines the Group’s commitment to conducting business ethically and in compliance with applicable laws in the UAE in relation to AB&C, as well as applicable international standards and best practices to the extent they relate to the Group’s activities.

4. SCOPE

- 4.1. The Policy addresses the following areas:
- 4.1.1. Forms of Bribery and Corruption
 - 4.1.2. Record Keeping
 - 4.1.3. Access, Data Confidentiality and Data Privacy
- 4.2. Queries and concerns can be raised by sending an email to thirdpartyqueries@aldar.com.
- 4.3. The UAE is committed to combating illicit financial activities and has taken major steps to set the legal framework and identify institutional paths for implementing the Processes and measures that would contribute to facilitating a robust financial crimes Compliance Program.

5. COMPLIANCE

- 5.1. The Policy strives to enable the Group to comply with AB&C relevant laws and regulations and adhere to the UAE regulatory authorities governing the implementation of these laws and regulations.
- 5.2. In addition, every entity / sub entity of the Group, located in a jurisdiction outside of the UAE must follow their respective local laws and regulations as required by the jurisdictional supervisory authority of that particular jurisdiction.
- 5.3. Violations of the Policy may result in corrective action, including disciplinary action by management consistent with the severity of the incident and potentially even punitive and legal proceedings if required by law.
- 5.4. If you have a suspicion or concern about conduct that may be in breach of the Policy, any other illicit or unethical behaviour, you must immediately report this by email to thirdpartyqueries@aldar.com or anonymously through the Group’s whistleblower program “AWARE”.

B. POLICY STATEMENTS

1. FORMS OF BRIBERY AND CORRUPTION
 - 1.1. The Group adopts a zero-tolerance approach to bribery, corruption, fraud, offering or accepting improper gifts or payments and any other forms of crime in the course of conducting business.
 - 1.2. Prohibition of Facilitation Payments
 - 1.2.1. Facilitation Payments are considered bribes and prohibited under the Policy, even if they are common, customary, or required under unofficial rules that do not have the force of law.
 - 1.3. Prohibition of Kickback
 - 1.3.1. Kickbacks are considered bribes and are prohibited under the Policy.
 - 1.4. Restrictions on Gifts and Entertainment
 - 1.4.1. Gifts and Entertainment (“G&E”) can potentially be used as bribes which is why the Group requires G&E to be declared and managed in a transparent manner.
 - 1.4.2. Employees are allowed to offer and receive normal and appropriate G&E in the ordinary course of business, given without corrupt intent or purpose. The Aldar Group Gifts and Entertainment Policy Manual provides clear guidance on acceptable G&E.
 - 1.5. Restrictions on Political and Charitable Donations
 - 1.5.1. The Group may choose to engage in political or charitable activities and causes or make donations to political or charitable organizations. However, all such activities and donations must be in line with the Group’s values / initiatives and regulatory measures must be taken to ensure that such donations to political or charitable activities are not perceived as an act of bribery or corruption.
 - 1.5.2. Political or charitable contributions are not permitted in exchange for financial concessions, recommendations, favourable treatment, other improper influence, or commercial objectives.
 - 1.6. Restrictions on Business Partners
 - 1.6.1. The Group’s zero-tolerance policy towards bribery and corruption ensures that it does not engage or deal with unethical Business Partners (BPs). In case of any violations identified or reported, then the Group may consider terminating the relationship.
 - 1.6.2. The Group’s procurement Procedures must reflect ethical standards and be undertaken on a fair and transparent basis in selecting BPs. The BPs must sign an undertaking at the time of on-boarding as the Group’s counterparty, that the BP will not indulge in any way which will violate the Policy.
 - 1.6.3. The Group reserves the right to not engage or deal with any BPs if it suspects that BPs will breach applicable Anti-Bribery and Corruption laws or the Group’s Policies and Processes relating to AB&C.
2. RECORDKEEPING
 - 2.1. The Group must keep financial books, records and accounts, and have appropriate internal controls in place which will evidence the business reason for making payments to BPs.

3. ACCESS, DATA CONFIDENTIALITY AND DATA PRIVACY

- 3.1. All activities, records, documentation and communication relating to activities and matters under the Policy are strictly confidential and must be handled in line with the relevant jurisdictional data privacy rules, regulations and policies of the Group.

C. DEFINITIONS

Term or Abbreviation	Definition
Aldar Group or Group or Company	Aldar Group / Group / Company which includes Segments/Entities and their Subsidiaries.
AB&C	Anti-Bribery and Corruption
Business Partners ("BPs")	A contractual, exclusive agreement between parties that represents a commercial alliance who agree to work together for a mutually beneficial common purpose e.g., vendors, supplier, outsourced staff, third parties etc.
Compliance Program	The set of compliance policies, procedures, processes, controls, systems and activities implemented within Aldar to support its adherence to its compliance obligations.
Department	An organisational unit of the Company, which forms part of a division.
Division	A vertical organisational unit of the Company, which may have subordinate Departments.
Employee	An employee of the Company, which includes temporary, permanent, full-time, and part-time employees
Facilitation Payment	An unofficial payment made directly or indirectly to perform or expedite a routine act as part of the individual's ordinary duties
Governing Instrument	Any document that establishes the rules, principles, or guidelines that the Policy must adhere to.
Gifts and Entertainment (G&E)	Means anything of value (such as money, a gift, a meal, entertainment, travel, accommodation or attendance at an event) that is provided to or received from a third party, in the context of a business interaction.
Policy	An Instrument containing statements of principle, business rules, or general processes that articulate or align with legal, regulatory, or organisational requirements, and by which the Company is guided in the management of its affairs and the development of Procedures.
Procedure	An Instrument which describes the activities necessary to implement a Policy, focused on the responsibilities and requirements to carry out tasks, activities and processes.
Process	Process is a series of tasks to be undertaken to carry out operational task, eventually achieve the intended results or outputs, and contribute to the successful operation of the Company. The process also identifies specific responsibilities and supporting documents intent necessary for its full implementation and maintenance.

Term or Abbreviation	Definition
Supporting Documents	Documents which support the implementation of Instruments. They cannot be used to impose binding, mandatory obligations. Supporting Documents include but are not limited to guidelines, forms, templates, SOPs and any 'uncontrolled' documents (E.g., system generated or external).