



Aldar Group

Aldar Group Gifts and Entertainment Policy Manual

Instrument Information

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Instrument History

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A. INTRODUCTION

1. TITLE

- 1.1. This Instrument is titled the Gifts and Entertainment ("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 Gifts and Entertainment ("G&E") related provisions.
- 2.2. The Policy intends to guide all the Group's Employees, contractual staff ("Employees") (Group's Representatives) and third parties (where applicable) as to their obligations and responsibilities associated in their day-to-day activities.

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, as well as applicable international standards and best practices to the extent they relate to Group's activities.

4. SCOPE

- 4.1. The Policy sets out principles relating to giving and receiving G&E with a commitment of adhering to ethical standards of conduct in support of Aldar's Group Anti Bribery and Corruption Policy.
- 4.2. The Policy sets the threshold for seeking an approval of G&E and related record maintenance requirements.
- 4.3. The Policy addresses the following areas:
- 4.3.1. Implications associated with G&E
 - 4.3.2. Recordkeeping
 - 4.3.3. Access, Data Confidentiality and Data Privacy
- 4.4. Queries and concerns can be raised by sending an email to thirdpartyqueries@aldar.com.
- 4.5. 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 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. IMPLICATIONS ASSOCIATED WITH G&E

1.1. Prohibition of G&E

1.1.1. It is prohibited to offer, accept or solicit (directly or indirectly via a third-party):

- any form of cash or any monetary equivalents such as gift cards, gift certificates or cash envelopes.
- to / from a Business Partner (BP) that is engaged in a bid or tender process in which the Group is involved unless there is a prior approval obtained on the reported declaration.
- to a Public Official, or their agent / representative (whether directly or indirectly) unless there is a prior approval obtained on the reported declaration.
- if it places the Employee under any obligation or expectation of returning the benefit.
- if it exceeds the value of AED 1,500 per year in case of a gift.
- if it exceeds the value of AED 500 per person / per event in case of entertainment unless it's a landmark event like F1, product launches, which are required to be declared and subjected to an approval process.
- if any aspect of the G&E (including nature, value, venue, or fellow guests) that is inconsistent with ethical, cultural, or professional norms.

1.1.2. Queries and concerns can be raised by sending an email to thirdpartyqueries@aldar.com.

2. REPORTING AND MONITORING

2.1. A mechanism is established to facilitate the declaration of G&E related matters for the Group's Representatives.

2.2. Employees are obligated to declare all G&E related matters that are prohibited as defined in the Policy.

2.3. All G&E declarations will be reviewed and approved / a course of action will be concluded in a timely manner.

3. RECORDKEEPING

3.1. The Group must keep financial books, records and accounts, and have appropriate internal controls in place which will evidence the business reason for accepting / providing G&E to BPs.

4. ACCESS, DATA CONFIDENTIALITY AND DATA PRIVACY

4.1. 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.
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.
Gifts and Entertainment/ G&E	Any solicitation anything of value (such as money, a gift, a meal, entertainment, travel, or attendance at an event) that is provided to or received from a third party, in the context of a business interaction.
Governing Instrument	Any document that establishes the rules, principles, or guidelines that the Policy must adhere to.
Group’s Representatives	Refers to the Board of Directors (BOD), all the Group’s employees and the contractual staff.
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.