



# **Ethical Business Practices Policy**

## Documentation Information

|                       |  |
|-----------------------|--|
| <b>Document Title</b> | <b>Ethical Business Practices Policy</b> |
| Version               | 1.0                                      |
| Created On            | 11 November 2023                         |
| Implemented On        | 1 Jan 2024                               |
| Prepared by           | Legal & Compliance Department            |
| Approved by           | Board of Directors                       |



## Table of Contents

|   |          |
|---|----------|
| <b>Documentation Information</b>        | <b>2</b> |
| <b>Table of Contents</b>                | <b>3</b> |
| 1. Introduction                         | 4        |
| 2. Core Ethical Principles              | 4        |
| 3. Compliance with Laws and Regulations | 4        |
| 4. Conflict Of Interest                 | 5        |
| 5. Fair Dealing                         | 5        |
| 6. Confidentiality and Privacy          | 5        |
| 7. Respect in the Workplace             | 5        |
| 8. Environmental Responsibility         | 6        |
| 9. Community Engagement                 | 6        |
| 10. Reporting Violations                | 6        |
| 11. Policy Enforcement                  | 6        |
| 12. Policy Review And Amendments        | <b>6</b> |
| 13. Conclusion                          | 7        |



# ETHICAL BUSINESS PRACTICES POLICY FOR BADEM MIDDLE EAST LLC (BADEM)

## 1. Introduction

The Ethical Business Practices Policy of Badem Middle East LLC, establishes the fundamental principles and guidelines for conducting business with the highest standards of ethics. This policy serves as a blueprint for all employees, management, and stakeholders, guiding them in making ethical decisions and actions in their daily work. It applies to all aspects of business conduct and is relevant to all employees and those who represent or act on behalf of the company.

## 2. Core Ethical Principles

At Badem, we are committed to upholding core ethical principles that form the foundation of our business practices:

**Integrity and Honesty:** Conducting business with unwavering integrity and honesty in all dealings.

**Fairness and Respect:** Treating all individuals and entities with fairness and respect, regardless of their position or status.

**Accountability and Transparency:** Being accountable for our actions and maintaining transparency in our business operations.

## 3. Compliance with Laws and Regulations

Badem is committed to full compliance with all applicable laws and regulations in the jurisdictions where we operate. This includes, but is not limited to, adherence to local and international laws, and industry-specific regulations. Our employees are expected to be informed about and comply with legal standards relevant to their roles and responsibilities.



## **4. Conflict Of Interest**

Badem recognizes the importance of identifying and managing conflicts of interest. Employees are required to avoid situations where their personal interests could conflict with the interests of the company. This includes financial interests, relationships, and other external activities. Employees must disclose any potential conflicts of interest to their supervisors or the designated compliance officer.

## **5. Fair Dealing**

Badem is dedicated to fair dealing in all its business interactions. We are committed to competing fairly and ethically in the marketplace. This commitment extends to our dealings with customers, suppliers, competitors, and employees. We strictly prohibit any form of manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices.

## **6. Confidentiality and Privacy**

Protecting confidential information and respecting privacy are paramount at Badem. Employees are responsible for safeguarding sensitive information, including proprietary data, customer information, and other confidential material. Adherence to data privacy laws and regulations is a critical aspect of our business operations, ensuring the trust and confidence of our clients, partners, and employees.

## **7. Respect in the Workplace**

Badem is committed to fostering a workplace environment characterized by respect and dignity. This includes a strict policy against discrimination and harassment in any form. We strive to provide a safe, healthy, and inclusive work environment for all employees, free from any form of discrimination based on race, color, religion, gender, age, national origin, disability, sexual orientation, or any other protected characteristic.



## **8. Environmental Responsibility**

Badem is dedicated to environmental stewardship and sustainability. We are committed to conducting our business in an environmentally responsible manner, adhering to environmental laws and regulations, and striving to minimize our environmental footprint. Sustainable practices are integrated into our business operations, and we encourage our employees and partners to join us in these efforts to protect and preserve the environment.

## **9. Community Engagement**

Badem is committed to positively impacting the communities in which we operate. Our corporate social responsibility initiatives focus on community development, education, and social welfare. We engage in various activities and partnerships that contribute to societal well-being and sustainable development, reflecting our dedication to being a responsible corporate citizen.

## **10. Reporting Violations**

Badem encourages an open and transparent environment where ethical concerns or violations can be reported without fear of retaliation. Employees are urged to report any suspected breaches of this policy or other unethical conduct. The company provides secure and confidential channels for reporting, and ensures protection for those who report in good faith.

## **11. Policy Enforcement**

Compliance with this Ethical Business Practices Policy is mandatory for all employees and representatives of Badem. The company will conduct regular monitoring and audits to ensure adherence to these guidelines. Violations of the policy may result in disciplinary action, up to and including termination of employment. Badem is committed to enforcing this policy consistently and fairly to maintain the highest ethical standards in our business operations.

## **12. Policy Review And Amendments**

This Ethical Business Practices Policy will be reviewed periodically to ensure its continued relevance and effectiveness. Amendments may be made to reflect changes in legal requirements, industry standards, or company objectives. All employees will be informed of any



significant changes to the policy, and appropriate training will be provided to ensure understanding and compliance.

### **13. Conclusion**

Badem Middle East LLC (Badem) is dedicated to maintaining the highest standards of ethical conduct in all aspects of our business. This Ethical Business Practices Policy is a cornerstone of our commitment to integrity, fairness, and responsibility. We expect all employees and representatives of Badem to adhere to these principles, thereby ensuring our continued success and reputation as an ethical and responsible business entity.