



### INTRODUCTION

- → A Message from our Chief Executive Officer
- → A Message from our Board
- Our Code's Guiding Principles
- Our SEED Values
- About the Al Dahra Code of Conduct



### A Message from our Chief Executive Officer

Al Dahra is a business with a proud history and a bright future. We have undergone a remarkable transformation in recent years, expanding our operations globally. From our humble beginnings in the UAE, to responsibly farming across a land base of over 400,000 acres worldwide, we have come a long way in our mission to sustainably feed our growing world.

With a global footprint in more than 20 countries, and a presence in over 45 markets, we may at times find ourselves in situations where our ethics are challenged.

Our Code of Conduct is here to guide us through these situations in accordance with our SEED Values – Sustainable, Engaged, Empowered, Determined – and provides an overview of the standards of integrity and ethical behaviour we expect from all Al Dahra employees and everyone who does business with us.

For me, living by this Code is crucial to fulfilling our organizational purpose. This Code provides fundamental principles for us to follow so that we always do the right thing, and act with integrity as we deliver on our mission to sustainably feed our growing world.

I encourage you to take the time to read and understand the principles in our Code. Consider how they apply to your role at Al Dahra. I trust that each of you will uphold the Code and continue to help us protect and strengthen our reputation as an ethical, value-driven organization.

### **Arnoud van den Berg**

**Group Chief Executive Officer** 

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Our mission is to help
sustain a growing global
population and meet the
challenges of food security

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### A Message from our Board

Since its inception, Al Dahra has charted an impressive trajectory of growth and development. As a leader in innovative food solutions and a key partner in the UAE's food security strategy, Al Dahra is dedicated to cultivating, producing, and trading grains, forage, and other crops, alongside essential food commodities. Our mission is to help sustain a growing global population and meet the challenges of food security.

As a member of the Al Dahra family, you are an integral part of an organization with a global presence. The Al Dahra Code reflects who we are and how we work. By following the Code, we safeguard our operations and foster a strong culture of ethics and compliance, ensuring integrity remains at the heart of everything we do.

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#### **Hamdan Al Dahmani**

Al Dahra Board Member | Audit Risk Compliance Committee Chairman

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We are committed to acting responsibly toward our employees, customers, business partners, and the communities in which we operate.



### A Message from our Board

At Al Dahra, we aim not only to generate value for our shareholders but also to serve our stakeholders in an ethical and responsible manner. We are committed to acting responsibly toward our employees, customers, business partners, and the communities in which we operate.

Acting with honesty, integrity, and in compliance with the Code is essential to maintaining Al Dahra's reputation as a trusted and respected organization. Thank you for playing your part in upholding our ethical standards and ensuring Al Dahra continues to thrive responsibly.

### **Supun Ranasinghe**

Al Dahra Board Member | ExCom Member

#### GUIDING PRINCIPLES

### We comply with laws, regulations, sanctions programs and standards

- Applicable Laws
- > Competition Law
- > Trade Sanctions
- > Keeping compliant Books & Records

### We act with integrity in all our business dealings

- > Anti-Bribery and Corruption
- > Business Gifts and Hospitality
- > Conflicts of Interest
- > Our Business Partners

### We protect Al Dahra's assets

- Managing Confidential Information, DataProtection & Privacy
- Physical and Information Technology & Communication Systems
- > Authority to Act for the Company

### We care for our people and uphold their rights

- > Inclusive and Responsible Workplace
- > Human and Labor Rights

### We uphold our commitment to building a better world

- > Sustainability & Environment
- > Donations & Sponsorships

### We are committed to upholding

- the highest standards of QHSSE across all our operations
  - > Quality
  - Occupational Health & Safety

### If we think something is not right, we Speak Up

- > What should I do if I learn about or suspect misconduct?
- How we investigate and address concerns



### Values

### **Our Purpose & SEED Values**

Our SEED Values form the foundation of our business, operations, and relationships. They inspire and inform the way we conduct our business. Although our Code serves as an essential guide for our conduct, it doesn't cover every potential situation you may face. Our Code aims to embed our Values into our day-to-day behaviours and ethical decision making. We are each individually responsible for living the Code and Values every day.

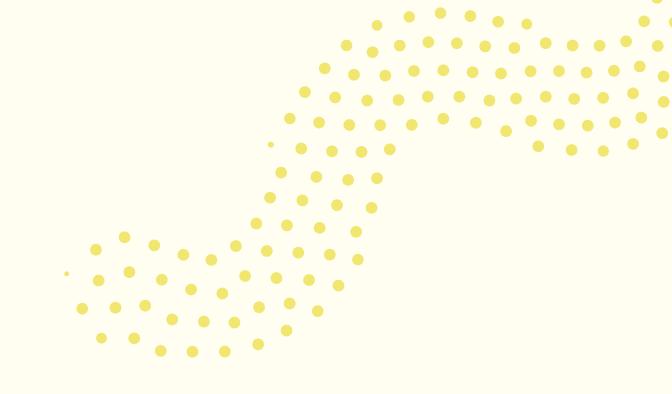
We are Sustainable: We are responsible stewards, committed to delivering positive impact through our decision-making and our actions.

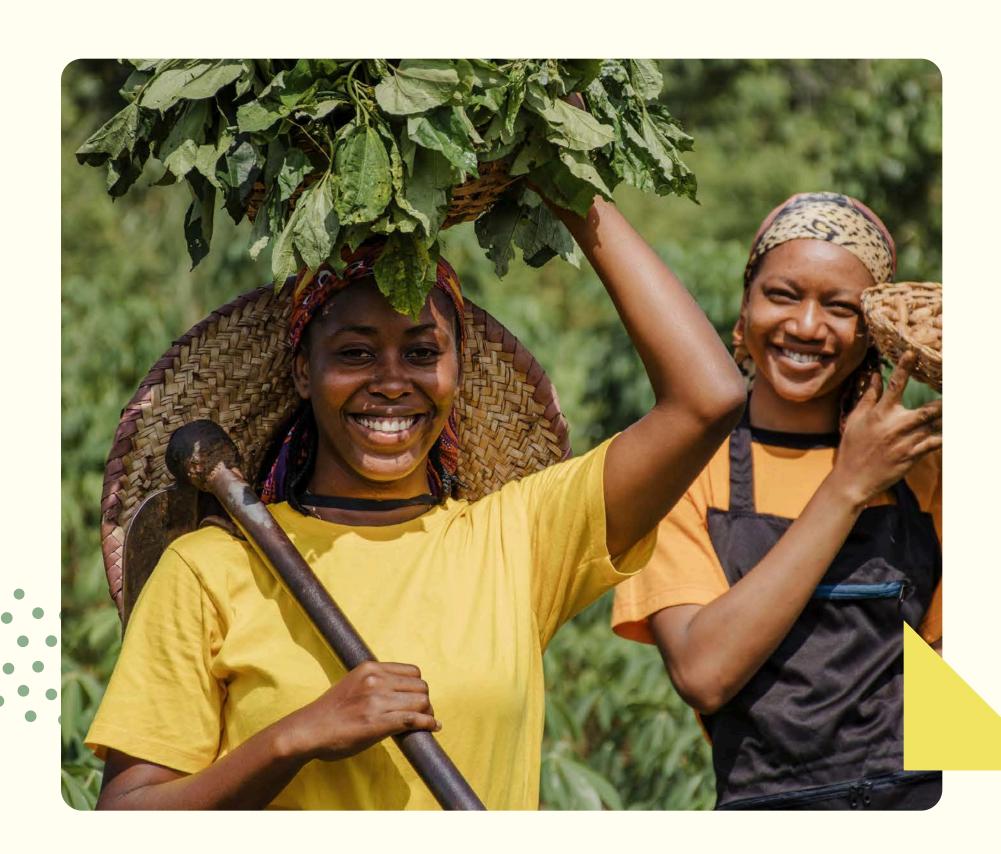
We are Engaged: We work openly and together, actively nurturing creativity and agility to resolve challenges and achieve common goals.

We are Empowered: We behave with integrity and boldness, taking ownership of our actions and responsibility for our impact.

We are Determined: We are passionate about what we do and challenge ourselves to continuously improve.

### About the Al Dahra Code of Conduct





### Why do we have a Code?

Al Dahra is committed to conducting business with the highest ethical standards and in compliance with the law and in line with our policies. Everyone who works for or with us is expected to share this commitment.

Al Dahra's Code of Conduct outlines our shared ethical standards for conducting business throughout the world. The Code summarizes key policies, highlighting issues that can have significant legal and ethical consequences if handled improperly and providing guidelines for appropriate action.

#### Who must follow our Code?

The Code applies to all Al Dahra employees working at all roles and levels (including board members), whether permanent, fixed term or temporary. We also expect all third-party service providers working on our behalf, such as agents, arrangers, consultants, contractors, trainees, agency staff, interns, to adhere to the requirements of the Code.

### About the Al Dahra Code of Conduct

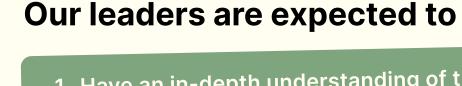
### **Employees are responsible to**

- 1. Comply and ensure compliance with this Code of Conduct, and observe all Al Dahra policies and procedures
- 2. Maintain a workplace environment that supports

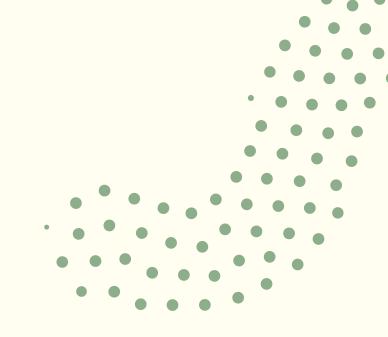
  honest respectful discussion and an above-the-line
  mindset
- 3. Be aware that compliance with this Code of Conduct is a shared responsibility
- 4. Seek guidance and support from their immediate managers and the appropriate Al Dahra departments whenever necessary
- 5. Report any concerns or potential violations of applicable laws and regulations, this Code of Conduct or Al Dahra policies

### Code violations

Employees who fail to comply
with our Code —including those
who fail to report Code violations
— may face disciplinary action, up
to and including termination.



- Have an in-depth understanding of this Code of Conduct, Al Dahra policies and the regulatory environment under their responsibility.
- 2. Set an example that inspires, and keep in mind our SEED Values in all their managerial decisions, acting at all times in the best interests of Al Dahra
- 3. Exercise oversight of the internal processes under their responsibility.
- 4. Act immediately to address identified violations of this Code of Conduct and take measures to prevent, detect and remediate any gaps or misconduct
- 5. Seek guidance and support from their immediate managers and the appropriate corporate functions whenever necessary.
- 4. Never use their position to request personal favours or services from their team or partners doing business with Al Dahra.



### Making the right decisions

When you are faced with a difficult situation and there is no specific guidance in the Code

Ask yourself

Is it legal?

Does it seem right?

Is it consistent with our Code, our Values, and our Policies?

Is it in the best interests of my co-workers, the company, and the community?

Would you be happy for your actions to be made public?



No

If you answered "Yes" to all the questions, then the decision to move forward appears appropriate.

If the answer is "No" or "I'm not sure", stop.

You should seek help in making the right decisions. You can seek
guidance from your line manager, People & Culture Representative or
the Ethics & Compliance Department



# We comply with all applicable laws, regulations, sanctions programs and standards

- 1. We comply with all applicable laws, regulations, sanctions programs and standards
- 2. We act with integrity in all our business dealings
- 3. We protect Al Dahra's assets
- 4. We care for our people and uphold their rights
- 5. We uphold our commitment to building a better world
- 6. We are committed to upholding the highest standards of QHSSE across all our operations
- 7. If we think something is not right, we Speak Up

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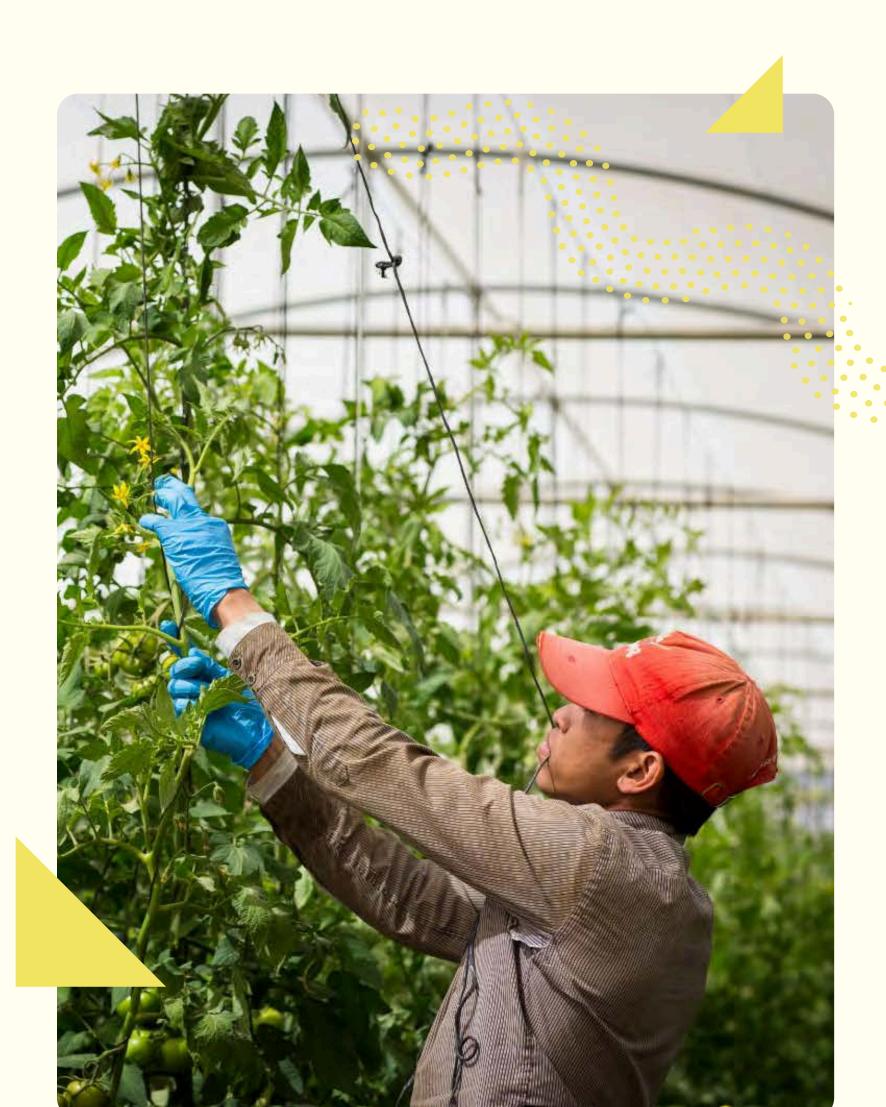
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### **Applicable laws**

As a global organization conducting business all over the world, our business activities are subject to the laws of many different jurisdictions. We are each responsible for following all the laws that apply to our business and should be aware that some laws extend beyond a specific country's borders and have extraterritorial scope. If you encounter a conflict or have any concerns about whether something is legal, contact the Legal Department for guidance.

### **Competition law**

Competition laws help preserve fair and honest competition in the marketplace. Conducting business in compliance with these laws helps us to build a sustainable and successful business. Although these laws may vary in different countries where we operate, they generally prohibit competitors from collaborating to limit competition. All employees are expected to follow competition laws and should ensure they understand any competition laws that apply to their business operations.



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### 1. We comply with all applicable laws, regulations, sanctions programs and standards

### Never

- 1. Attempt to eliminate competition or manipulate prices.
- 2. Enter into agreements with competitors to fix prices or terms of sale, allocate markets, restrict production, or influence the outcome of contract bidding processes.
- 3. Discuss sensitive business information with competitors, including pricing, sales volumes, production capacities, costs or margins, and customer information.
- 4. Impose exclusivity through conditions, obligations, or incentives with customers.

### **Trade sanctions**

Al Dahra does not do business with any sanctioned country, organization, or individual unless permitted by law. We have a duty to comply with a range of domestic and international sanctions programs. Violating a sanctions program can lead to severe consequences, including fines, losing access to vital banking services, damaging our reputation, and being blacklisted by customers and business partners.

If you are involved in international business transactions, you must be familiar with and comply with applicable trade sanctions. This includes submitting them to proper due diligence procedures and completing any risk mitigating actions that may be required before engaging them. If you are considering business with a sanctioned country, organization, or individual, consult with the Compliance Department first.

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### 1. We comply with all applicable laws, regulations, sanctions programs and standards

### Keeping compliant books & records

At Al Dahra we are committed to truthfully, accurately and completely recording all our business activities and financial transactions to provide a fair and complete picture of our operations, assets and financial position. This is essential for meeting our legal and regulatory obligations, maintaining the integrity of our financial reporting, and making sound business decisions.

Accurate record-keeping and retention are also required by relevant laws in the countries where we operate. Intentionally manipulating or falsifying Al Dahra's financial records or reports to deceive is Reporting Fraud. This might include overstating revenues or assets, understating expenses, or liabilities, concealing losses or frauds, or violating accounting standards or principles.

To ensure our books and records are transparent and reliable, we:

- 1. Make sure that all business records we create reflect the true nature of transactions and events.
- 2. Never falsify any records related to the business or our activities—never hide or overstate transactions or alter any documents or records.
- 3. Make business information readily available through timely reporting and publication.
- 4. Keep records and any required supporting documentation in a manner and for as long as statutory or internal rules require.
- 5. Never destroy records that are relevant to current or pending audit reviews, investigations, or legal proceedings.

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### **Question & Answer**

An important customer requested that I modify an invoice to reflect an earlier date for the sale than when it actually occurred. I am concerned about whether I should proceed with this change.

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No, you should not. Altering the invoice date would result in a false and misleading record, which violates our commitment to keep accurate and honest records of all Al Dahra's business activities.

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My supervisor asked me to delay recording an expense until next quarter, saying it would look better since we're just on budget for this quarter. Is this acceptable?

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No, it's not acceptable. Expenses should be recorded in the period in which they are incurred. Failing to do so would result in inaccurate and incomplete financial records

→ LEARN MORE

- Sanctions Policy
- Group Accounting Policy Manual

GUIDING PRINCIPLES

# We act with integrity in all our business dealings

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### 2. We act with integrity in all our business dealings

### **Anti-bribery and corruption**

Al Dahra has a zero-tolerance policy towards bribery and corruption. You must never offer or accept bribes, kickbacks, or other corrupt payments, regardless of local practices or customs.

Bribery is illegal in most places where we do business, and it can harm Al Dahra's reputation for conducting business with integrity. A bribe is giving or offering to give something of value to someone in exchange for obtaining or retaining a business advantage. A facilitation payment is a small bribe that typically involves unofficial payments made to expedite a service or circumvent a business process.

Facilitation payments can be in the form of "tips" but can also be disguised as additional administrative fees. Examples include payments to speed up the issuance of a visa, to approve a routine inspection, or to enable goods to clear customs.

### **Question & Answer**

Al Dahra is importing fresh produce to meet a tight delivery deadline. A customs official at the port informs you that customs clearance will take several days. They offer a same day "premium" expedited service for a small fee.

This expedited service may be a request for a Facilitation Payment. No payment should be made until confirmed legitimate and approved by the Ethics & Compliance Department.

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### 2. We act with integrity in all our business dealings

### **Business gifts and hospitality**

Exchanging gifts and hospitality can foster goodwill and strengthen business relationships. In certain cultures, gift-giving is a customary and expected practice. However, it is crucial to evaluate these gestures carefully to avoid compromising your objectivity or creating the appearance of impropriety. Al Dahra sets clear standards for acceptable gifts and hospitality exchanged in the context of business interactions.



#### Your role:

- 1. Do not give or accept extravagant gifts or hospitality (e.g., lavish dinners, expensive watches, mobile phones).
- 2. Avoid gifts or entertainment that during commercial negotiations. These could appear to improperly influence business decisions.
- 3. Do not give or accept cash or cash equivalents such as gift cards, gift certificates or vouchers.
- 4. Be careful when dealing with government officials.

  Understand the laws and regulations for dealing with government officials
- 5. Whenever you receive or give any gifts or hospitality, inform your manager and declare it in the Al Dahra Gifts & Hospitality register kept by the Compliance Department.

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### 2. We act with integrity in all our business dealings

### **Question & Answer**

In my culture, we give and receive holiday gifts from clients.

The Al Dahra Code say that there are circumstances where
the gifts may be seen as inappropriate. What should I do?

?

Gifts up to USD \$100 can be given or received without prior approval. However, if the value exceeds this amount, you must obtain prior approval from the Compliance Department. Always declare any gifts or hospitality you give or receive (no matter the value) in the Al Dahra Gifts & Hospitality Register.



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### 2. We act with integrity in all our business dealings



### **Conflicts of interest**

A conflict of interest can occur whenever our personal interests have the potential to interfere with our ability to work fairly and impartially. We must ensure that no opportunity for personal gain negatively impacts our judgment, job performance, or decision-making.

#### **Examples of Conflicts of Interest**

- Family or Personal Relationships: Allowing a personal relationship to influence a business decision for instance, hiring a family member as an employee or a vendor.
- Outside Employment: Working a second job that competes with your primary employment at Al Dahra or compromises your ability to fulfil your duties.
- Connection to Al Dahra Competitors: When an employee, or one of their family members, has a connection to a company that is a direct competitor to Al Dahra.

When faced with an actual or potential conflict of interest, it is essential to disclose it. All conflicts of interest should be recorded in Al Dahra's Conflicts of Interest Register held by Compliance Department.

#### Remember:

Note that perceived conflicts of interest can be just as damaging to our reputation as real ones. We should be alert to situations where someone might think the aim of our action, decision or statement is to gain an undue advantage.

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### 2. We act with integrity in all our business dealings

### **Question & Answer**

An employee owns a percentage interest in a significant Al Dahra supplier. This information has not been recorded in the Conflicts of Interest Register. What should the employee do?

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The employee should report this situation to the Compliance
Department immediately so that the Conflicts of Interest Register
can be appropriately updated. When a conflict arises, it doesn't
automatically mean that the situation cannot continue, but it must
be managed appropriately.



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### 2. We act with integrity in all our business dealings



### Our business partners

Al Dahra seeks business partners who share our values. We have a responsibility to ensure that Al Dahra only does business with legitimate third parties and that any compliance risks associated with a third-party relationship are appropriately identified and mitigated.

Where applicable, we require our business partners to undergo an appropriate level of due diligence before we do business with them and to adhere to our Global Vendor Code of Conduct.

If you are responsible for selecting and engaging with business partners, you should be aware of the appropriate process for selection.



- Anti-Bribery & Corruption Policy
- Third Party Corruption Risk Policy
- Global Procurement Policy
- Group Credit Risk and Collection Policy
- Global Vendor Code of Conduct
- Conflicts of Interest Policy

GUIDING PRINCIPLES

## We protect Al Dahra's assets

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### 3. We protect Al Dahra's assets

### Managing confidential information, data protection & privacy

#### Information classification

Information is an asset and should be treated as such.

Managing our information effectively is crucial to the success of our organization, and information classification is the process that helps us sort information into relevant categories. This helps us determine who can access it, how to store it, how critical it is, and how to protect it appropriately. The classification labels at Al Dahra are: Public, Internal, Confidential and Restricted.

Financial records, personal information, health records, and intellectual property are all classified as confidential or restricted information that should only be available to people who are authorized to view them.

Internal policies and procedures may be available for anyone within the organization and advertising material are for public consumption.



Confidential Information is any important or valuable business information belonging to Al Dahra that has not been made public or that has been assigned 'restricted' or 'confidential' by our data classification standard. Do not reveal confidential company information to colleagues or external parties where there is no business reason for doing so.

Whenever you do need to disclose confidential information for business purposes, make sure that you have proper authority to do so. Only disclose information on a on a 'need-to-know' basis after taking proper precautions such as entering into a non-disclosure agreement.

The Legal Department has prepared templates for you to use, which you can obtain from their 'Alfie' site.



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### **Data privacy**

In the course of business, we may collect, hold, or process personal information about our employees, customers, and other business partners. At Al Dahra, we treat personal data about our employees and customers with care and take responsibility for protecting it and using it lawfully and properly.

We all have a responsibility to treat personal data with care, taking responsibility for protecting it and ensuring its lawful and proper use.



### **Question & Answer**

I have just received an internal email regarding a confidential special project. I can't share it with anyone outside of our company, but can I share it with my colleagues?

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This information should only be shared with other colleagues who have a business need to know.

I encountered or observed suspicious activity that could be a cyb ersecurity threat, such as unauthorized access, phishing or data t heft. What should I do?

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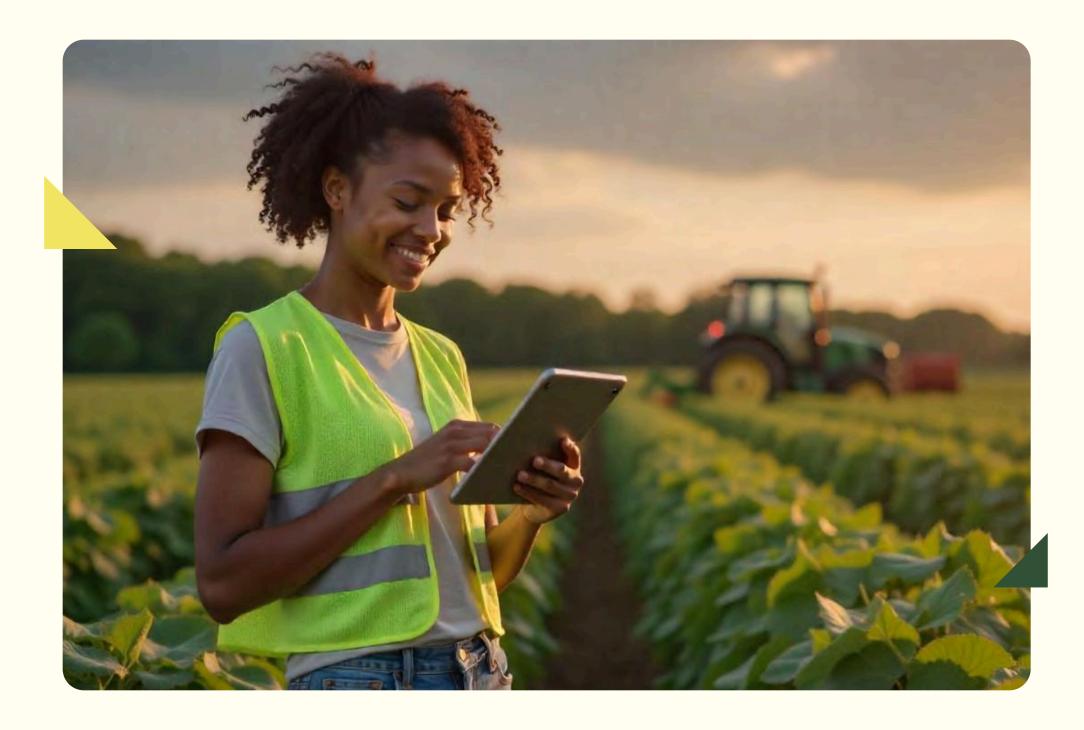
It is crucial to report this immediately. Use the IT incident reporting tool or contact the Information Security Office (ISO) at <a href="mailto:lnfoSec@aldahra.com">lnfoSec@aldahra.com</a>. Prompt reporting helps safeguard our organization's data and systems from further risks.

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### 3. We protect Al Dahra's assets

### Physical and Information Technology & Communication Systems

Each of us is responsible for protecting Al Dahra's assets, including physical assets like facilities, materials, and equipment, as well as Information Technology and Communication Systems, such as computers, internet services, telephones, and email



### We must use Al Dahra property and resources responsibly:

- 1. Use facilities, materials, equipment, and other physical assets, including corporate credit cards, only for authorized purposes related to your job responsibilities.
- 2. Never engage in unauthorized use of company assets or funds for personal purposes or financial gain.
- 3. Always protect IT assets from unauthorized access and safeguard all passwords associated with such equipment.
- 4. Use email, internet, phone, and other Al Dahra communication systems exclusively for business purposes only. Never use them to access material or websites containing offensive, inappropriate, or illegal content.
- 5. Flag phishing links and attend cybersecurity training and awareness sessions to proactively prevent cyber-attacks.
- 6. Think carefully about what you post on social media and do not attribute any of your posts to Al Dahra Group unless authorized to do.

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### Authority to act for the company

Your authority to act on behalf of Al Dahra is governed by applicable laws, the Delegation of Authority (DOA), Powers of Attorney (POAs), and related policies and procedures.

The Delegation of Authority is closely managed to prevent abuse. Acting outside the limits of your authority can harm Al Dahra and may result in disciplinary action.

#### What is expected of you as an employee?

- Understand the scope of your authority and its limits.
- Do not act outside the limits of your authority.
- Do not sign any document or commit Al Dahra to any agreement unless you are authorized to do so.
- Do not misrepresent the nature of a commitment to bypass the required approval process.

### → LEARN MORE

- Media and Social Media Policy
- Data Protection Policy
- Information Security Policy
- Acceptable Use Policy
- Data Classification Policy & Handbook
- Delegation of Authority

### **Question & Answer**

Can I post about my work or share company-related information on social media?

?

When using social media, it's important to maintain professionalism and respect for Al Dahra's confidentiality. Ensure that your posts align with the company's values and adhere to its social media policy.



GUIDING PRINCIPLES

# We care for our people and uphold their rights

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### 4. We care for our people and uphold their rights

### Inclusive and responsible workplace

At Al Dahra, we are committed to fostering a diverse and inclusive workplace where everyone feels valued and safe to speak up. We respect each person's differences and uphold dignity, respect, and fairness in all interactions. All employees must treat colleagues and business partners with professionalism and respect.



- Be honest and communicate clearly.
- Show respect to everyone you work with
- Respect cultural norms of the regions where you work and the people you work with.
- Follow the company dress code, considering cultural sensitivities.



- Engage in discrimination or unfair treatment
- Bully, harass, or humiliate others. This includes making derogatory comments, inappropriate jokes, unwanted physical contact, or engaging in actions that cause distress.
- Ignore misconduct. Report any incidents of bullying, harassment, or inappropriate behaviour

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### 4. We care for our people and uphold their rights

### **Question & Answer**

Whenever I ask my manager a question, they publicly mock me and question my qualifications. What should I do?

This behaviour may be considered bullying and, is disrespectful and inconsistent with our Code. Report your concerns through the Speak Up Platform or any of the other reporting channels at Al Dahra.



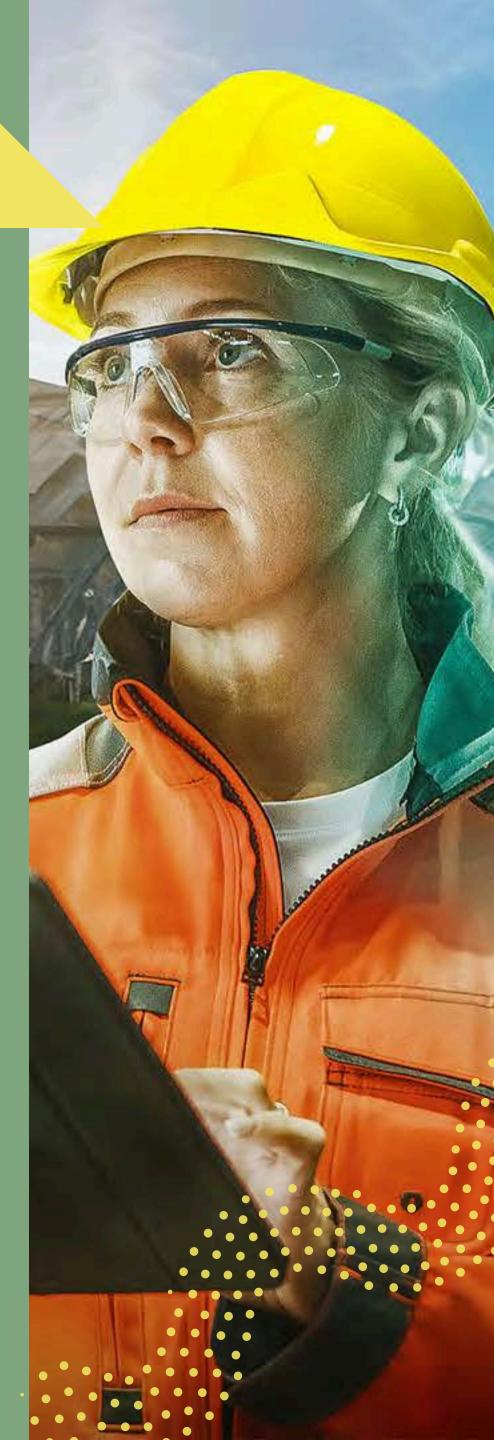
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### **SEED Moment**

We are responsible stewards, committed to delivering positive impact through our decision-making and our actions.

We are committed to being part of a responsible and sustainable value chain and will continue to work on improving our systems and processes to achieve this objective.



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### 4. We care for our people and uphold their rights

### **Human and labour rights**

We are committed to respecting internationally recognized human rights throughout our operations and supply chain. We continuously work to support and enforce these principles across our organization and in our relationships with suppliers, contractors, other business partners, and the communities affected by our operations.



Our Global Vendor Code of Conduct outlines the expectations we have for our business partners regarding human rights and business ethics, ensuring that we uphold ethical standards and promote transparency and accountability in all our third-party relationships.



- Group People & Culture Top 10 Policies
- Global Vendor Code of Conduct
- Global Procurement Policy

### Aligned with globally recognized frameworks, such as the UN Guiding Principles, our commitment to human rights includes:

- Providing safe and healthy working conditions for all employees.
- Adhering to employment laws and regulations, especially those related to minors, while promoting equal rights and combating workplace discrimination.
- Respecting local laws, regulations, and customs regarding working hours and overtime, and ensuring employees have adequate rest and leisure time.
- Supporting employees' rights to freedom of association and collective bargaining, in line with local laws and regulations.
- Eliminating child labour, forced labour, and modern slavery across our operations and supply chains worldwide.
- Practicing fair hiring and offering competitive, equitable compensation.
- Our commitment extends to all contractors, customers, suppliers, and representatives.

<u>GUIDING</u> PRINCIPLES

# We uphold our commitment to building a better world

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### 5. We uphold our commitment to building a better world

At Al Dahra, our commitment to building a better world is central to our purpose of sustainably feeding a growing world. Guided by our core value of sustainability, we drive our efforts across all areas of our operations. Through meaningful initiatives, we continue to make a positive impact and actively contribute to the well-being of our planet and communities, working towards a sustainable future for all.

### **Sustainability & environment**

As a global company we acknowledge our impact and take responsibility to protect the environment. Our commitment to responsible and sustainable agriculture is integral to every aspect of our operations and value chain.

We are dedicated to significant actions that improve performance and drive meaningful change. We set environmental objectives in accordance with Al Dahra's strategy demonstrating our commitment to continual improvement. Al Dahra focuses on three strategic sustainability priorities:

#### What we do

- 1. Growing More with Less: We maximize efficiency and minimize environmental impact by reducing resource use, investing in biodiversity and regenerative agriculture, monetizing carbon credits, and optimizing yield.
- 2. Sustainable Value Chain: Through responsible sourcing, sustainable logistics, and investments in green initiatives, we strive to build a more sustainable supply chain from start to finish.
- 3. Treating People Fairly: We prioritize diversity, inclusion, and safety in our workforce.

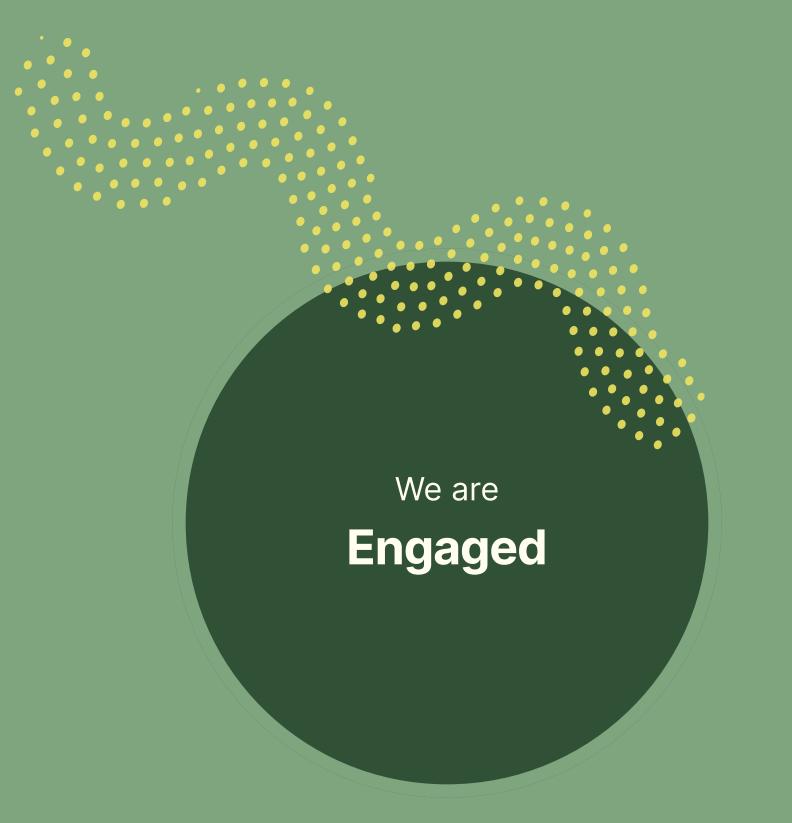


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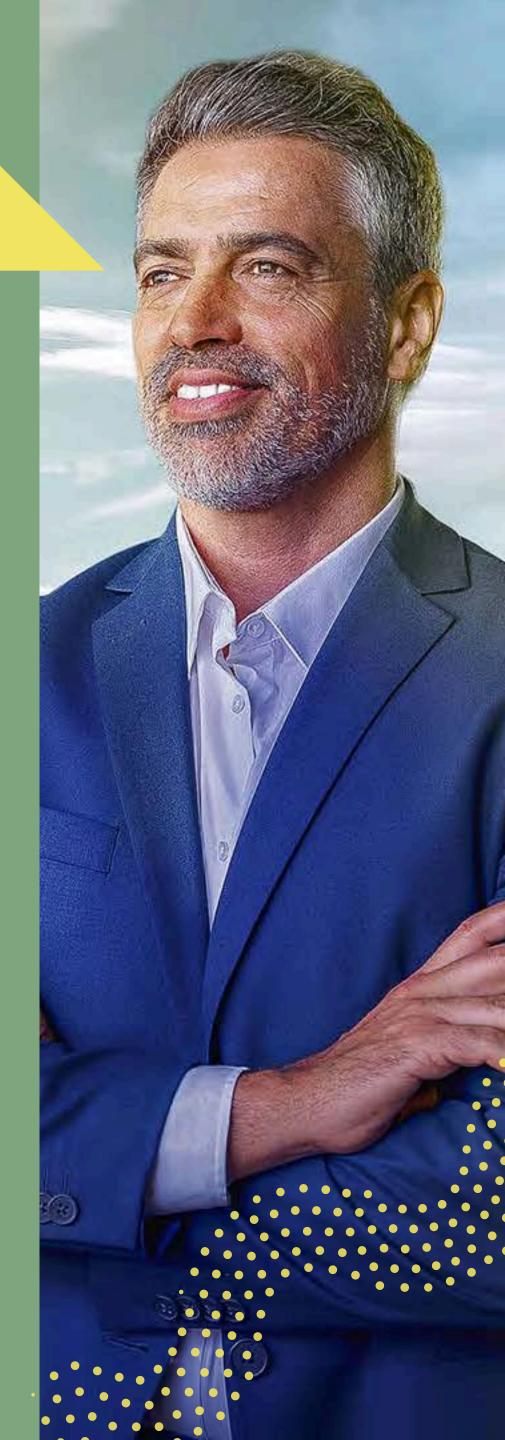
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### **SEED Moment**

We work openly and together, actively nurturing creativity and ability to resolve challenges and achieve common goals.

We strive to provide a working environment that respects diversity and looks after its people.



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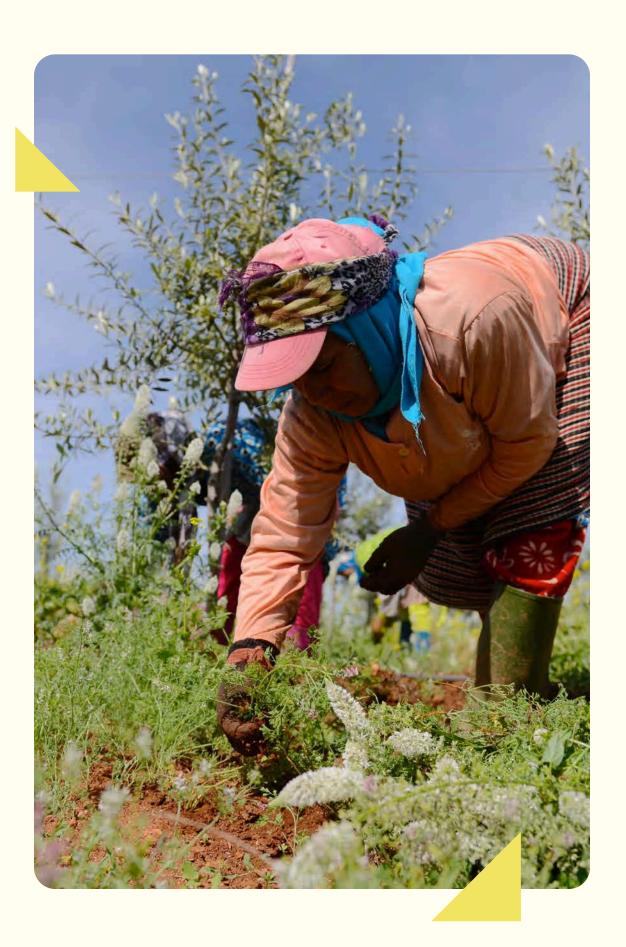
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### 5. We uphold our commitment to building a better world



### **Donations & sponsorships**

We prioritize donations and sponsorships in the following areas that align with the vision, mission, and values of Al Dahra.

- 1. Agriculture and Food Sustainability: Initiatives that promote sustainable agricultural practices, food security, and environmental stewardship.
- 2. Community Development: Projects that contribute to the social and economic development of communities in which Al Dahra operates.

Al Dahra prohibits donations and sponsorships that violate local laws and regulations, have political affiliations, are made directly to individuals rather than organizations, or create conflicts of interest. All donations and sponsorships must adhere to the approval process outlined in our Donations & Sponsorship Policy.



- Annual Sustainability Reports
- Donations & Sponsorship Policy

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GUIDING PRINCIPLES

# We are committed to upholding the highest standards of QHSSE across all our operations

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## 6. We are committed to upholding the highest standards of QHSSE across all our operations

At Al Dahra, we are dedicated to maintaining the highest standards of Quality, Health, Safety, Security, and Environmental (QHSSE) management across all our operations. This dedication is essential to ensuring the safety and well-being of our employees, partners, and customers, while preserving our leadership in the industry.

### Occupational health & safety

Al Dahra ensures a safe and healthy working environment by operating in full compliance with all health, safety, and environmental laws, as well as our internal policies and procedures:

- Employees are expected to protect themselves and others by following safety protocols and reporting any incidents or unsafe practices.
- Working under the influence of alcohol or illicit drugs, as well as carrying, consuming, or selling such substances on company premises, is strictly prohibited.

### Physical security

We prioritize the protection of our people, assets, and facilities by maintaining robust physical security measures. All employees must cooperate with security protocols to ensure a safe work environment:

- Where applicable, employees are required to wear company-issued IDs and maintain secure access to restricted areas. Employees must provide their IDs when requested by authorized personnel.
- Any unauthorized access or suspicious activity must be reported immediately to the security team or through the designated reporting channels.

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## 6. We are committed to upholding the highest standards of QHSSE across all our operations

### **Environment**

At Al Dahra, we aim to create a workplace environment that promotes health, well-being, and sustainability. Our facilities are designed and maintained to support safe, clean, and efficient working conditions for all employees:

- We implement measures to maintain high air quality, natural lighting, and ergonomic workspaces, contributing to employee well-being.
- We strive to minimize energy and water usage across our operations, actively advancing our environmental sustainability goals.

#### → LEARN MORE

- Quality Policy
- QHSSE Policies
- Safety Golden Rules
- QHSSE Policy

- Drug & Alcohol Policy
- Safety Golden Rules
- Other Policies & Procedures
- Visit <a href="https://aldahra.sharepoint.com/sites/QHSSE">https://aldahra.sharepoint.com/sites/QHSSE</a>
  to learn more

Employees must take precautions to protect themselves, their fellow employees, and visitors to our facilities. Employees must report any QHSSE-related concerns to **gqhsse.dept@aldahra.com** or by scanning the QR codes displayed at our sites.

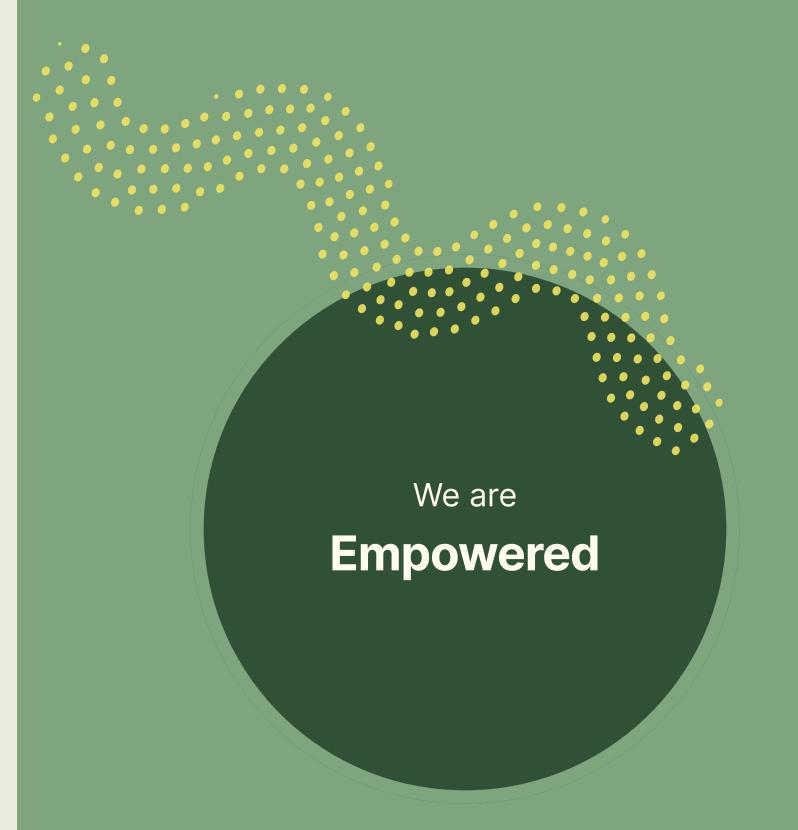


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### **SEED Moment**

We behave with integrity and boldness, taking ownership of our actions and responsibility for our impact.

Speaking up is the foundation of our ethical culture. Speaking up when something doesn't seem right demonstrates our integrity and that we have the courage to do the right thing.



GUIDING PRINCIPLES

# If we think something is not right, we Speak Up

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### 7. If we think something is not right, we Speak Up

### What should I do if I learn about or suspect misconduct

We all have a duty to question actions which appear to conflict with the Code, other company policies, or the law. If you observe such behaviour, you should Speak Up.

Concerns should only be raised in good faith where there is a genuine suspicion of wrongdoing.

Al Dahra is committed to an open and transparent culture where everyone is empowered to speak up. You have the power to stop wrongdoing and protect Al Dahra and your colleagues. To report a concern, you can:

- Talk to your Manager/ Business Leader
- Contact the Ethics and Compliance Department at compliance@aldahra.com
- Anonymously report using our Speak Up Platform My Voice



#### This service is

Available from your laptop and mobile

Open 24/7, in all languages where Al Dahra operates

Accessible to employees and external parties

Operated by an independent third party, providing you a secure way to anonymously submit your concern



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### 7. If we think something is not right, we Speak Up

### How we investigate and address concerns

We take all reports of potential misconduct seriously and handle them promptly, fairly and as confidentially as possible. During an investigation, information is disclosed strictly on a need-to-know basis. You are expected to cooperate and to answer all questions honestly during any investigation.

We have a zero-tolerance approach to retaliation against anyone who raises a concern in good faith, and those who engage in any retaliatory behaviour will be subject to disciplinary action.

Where disciplinary action is applied following an investigation, it will be governed by the procedures outlined in the applicable Disciplinary Protocol or relevant Local Policy. Depending on the circumstances of the case, this may include verbal warnings, written warnings, suspension, termination of employment, and, in the most serious cases, reporting to authorities for prosecution.

### → LEARN MORE

- Speak Up Policy
- Disciplinary Protocol
- Investigations Policy

### **Question & Answer**

I used the Speak Up platform to report my line manager for non-compliance. I am worried that my boss will find out I raise d a concern about him, and he will punish me. How is confiden tiality maintained in the reporting process?

?

During an investigation, information is disclosed strictly on a need-to-know basis. On the Speak Up platform, your report is shared exclusively with the Ethics and Compliance Department. Line managers and the leadership team do not have access to the reports on the Speak Up Platform. Al Dahra does not tolerate retaliation against anyone who raises a concern or participates in an investigation in good faith. If you believe you have faced retaliation for raising a concern, you should report this.

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### **SEED Moment**

We are passionate about what we do and challenge ourselves to continuously improve.

Our unwavering focus on QHSSE excellence demonstrates our passion for continuous improvement and our determination to protect our people, assets, and the environment, driving long-term success and sustainability.



#### GLOSSARY

#### Business Partner

Any individual or organization Al Dahra engages with in business activities, including customers, suppliers, consultants, and other entities, who are expected to uphold legal and ethical standards.

#### Competition Law

Laws governing market behavior to prevent anti-competitive actions like pricefixing and monopolies. Al Dahra complies with these regulations to ensure fair competition in the agriculture and food sectors.

#### Books and Records

Al Dahra's documentation and financial records, ensure transparency, accountability, and compliance with relevant regulations and standards.

#### Bribe

Any improper payment or benefit given to influence a decision or action by someone in a position of authority. Al Dahra does not tolerate bribery in any form.

### Facilitation Payment

A small payment made to a public official to expedite routine actions. Al Dahra prohibits facilitation payments as part of its anti-bribery and corruption policy.

#### Gift

A tangible item given to influence a decision. Al Dahra has strict guidelines on receiving and giving gifts to avoid conflicts of interest and unethical practices.

### Competitors

Other companies operating in the agriculture, food sustainability, and related sectors, competing with Al Dahra for market share, customers, and resources.

#### Conflict of Interest

A situation where personal interests interfere with professional responsibilities. At Al Dahra, all employees and business partners must disclose any potential conflicts to maintain integrity in decision-making.

#### Confidential Information

Sensitive business, financial, or personal information that must be protected. Employees and partners of Al Dahra are required to keep this information secure and confidential.

### Data Privacy

The protection and responsible handling of personal data. Al Dahra ensures compliance with data protection laws and maintains the privacy of individuals' personal data across all operations.

#### Fraud

Deceptive actions meant to gain unfair advantage or cause harm, such as misrepresentation or theft. Al Dahra has zero tolerance for fraud.

### Speak Up

Al Dahra's process for confidentially reporting any concerns or unethical behavior. Employees are encouraged to speak up if they suspect misconduct, with protection against retaliation.



#### GLOSSARY

### Hospitality

Offering services like meals, travel, or entertainment to clients or business partners in a professional context. Al Dahra ensures hospitality is offered appropriately and without influence on business decisions.

### Intellectual Property

Legal rights to creations and innovations, including trademarks, patents, and copyrights. Al Dahra protects its intellectual property and respects the IP rights of others.

#### Personal Data

Information that identifies an individual, such as contact details or financial information. Al Dahra safeguards personal data in accordance with privacy laws.

#### Sanctions

Restrictions imposed by governments to limit business activities with certain countries, individuals, or organizations. Al Dahra ensures compliance with international sanctions regulations in its global operations.

### UN Guiding Principles

The United Nations principles that guide businesses, including Al Dahra, in respecting human rights and conducting business responsibly in line with sustainable development goals.

### Third Party

Any external individual or organization with whom Al Dahra interacts during business operations, including customers, suppliers, agents, and advisors.

### Phishing

A form of cyber fraud where deceptive emails or websites attempt to steal sensitive information. Al Dahra educates employees on the risks of phishing and other cyber threats.

#### Social Media

Online platforms such as LinkedIn, Facebook, and Twitter. Al Dahra encourages responsible use of social media to protect its reputation and ensure compliance with company policies.

### Delegation of Authority

The process by which Al Dahra assigns decision-making powers to authorized individuals within the organization, ensuring clear accountability and efficient operations.



## aldahra