TROJAN
CONSTRUCTION GROUP

SUPPLIER CODE OF CONDUCT POLICY

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Supplier Code of Conduct Policy

Introduction

The Supplier Code of Conduct Policy (the Policy) outlines guidelines of Trojan Construction Group – Sole Proprietorship LLC (TCG) and its subsidiaries (henceforth referred to as the Group)'s expectations of its external parties (vendors/suppliers, contractors, service providers etc.) on ethical conduct.

Scope

The Policy applies to external parties including vendors/suppliers, contractors, service providers (as well as their employees, agents, affiliates, and subcontractors, etc.) that work with TCG, its subsidiaries and affiliate companies. TCG encourages subsidiaries and affiliate companies to define their respective supplier code of conduct aligned with their core values. The principles set forth in this Policy shall be in addition to, and not in lieu of, any written or other agreement with TCG's external parties and any legal or other obligations independent of such agreements.

Policy Statement

TCG acknowledges that activities of its external parties may impact TCG's reputation and relationship with stakeholders. Accordingly, TCG encourages external parties to uphold the following principles while conducting business with or on behalf of TCG.

Honesty and Ethical Conduct

TCG encourages external parties to prohibit and not engage in bribery, corruption and facilitation of payments, money laundering and financial terrorism, fraud, extortion, anti-trust and anti-competitive dealing, tax evasion, use of insider information, and substance abuse in accordance with applicable laws and regulations. Additionally, TCG encourages external parties to have policies that prohibit or define internal controls on gifts, honorarium, meals, entertainment or hospitality, and contributions or donations.

Privacy and Data Protection

TCG encourages external parties to comply with data protection laws while taking necessary security measures to protect the privacy and confidentiality of data belonging to their customers, employees, or other third parties. Confidential information obtained by an external party through a relationship with TCG must not be misappropriated or used for personal advantage or for the benefit of third parties. External parties may refer to TCG's Privacy and Data Security Policy for further details.

Conflict of Interest

TCG encourages external parties to avoid conflict of interest in its business dealings and with TCG, in accordance with applicable laws and regulations in locations where they operate.

Environmental Performance

TCG encourages external parties to mitigate and reduce their adverse impacts on the environment including, but not limited to, Greenhouse Gas (GHG) emissions and climate change, natural resource and energy use, waste disposal, toxic emissions and hazardous waste disposal, and water effluents. TCG encourages external parties to comply with relevant environmental laws and regulations in locations where they operate.

Human Rights
TCG encourages external parties to uphold internationally proclaimed human rights including not using child labor, forced and compulsory labour acquired through modern slavery or human trafficking, in alignment with International Labour Organization (ILO) conventions, and laws and regulations of locations where they operate. TCG encourages external parties to create a work environment that is free from discrimination of any kind, harassment, or abuse, including the protection of individuals that report of discrimination, harassment, or abuse against retaliation. TCG encourages external parties to create lawful working conditions and adopt equal employment opportunities.

Health and Safety
TCG encourages external parties to provide a safe and healthy workplace according to laws and regulations in locations where they operate.

Supporting Local Communities
TCG encourages external parties to implement initiatives that support their local communities in ways appropriate to their business.

Means of Encouragement
TCG's Request for Proposals (RFPs) shall allot a minimum of 5-10% (combined) of the overall score to honesty and ethical conduct evidence provided by suppliers bidding for contracts of the above; evidence of honest and ethical conduct policies and procedures, privacy and data protection policies and procedures, conflict of interest policies and procedures, environmental policies and procedures, human rights policies and procedures, health and safety policies and procedures, and supporting local communities.

Stakeholder Engagement
TCG fosters relationships with stakeholders to better understand ethical conduct concerns and endeavours to integrate these considerations into this Policy.

Training and Awareness
TCG encourages external parties to promote the training and development of their employees to empower them with the knowledge and skills they need to uphold ethical conduct. TCG encourages external parties to further promote awareness and an understanding, amongst employees, of how ethical conduct impacts their operations and how their operations impact stakeholders.

Compliance
TCG encourages external parties to understand and comply with this Policy. If, for any reason, external parties cannot comply, they should inform TCG at the earliest opportunity. TCG may request external parties to certify compliance with this Policy and reserves the right to conduct inquiries of external parties to assure compliance with this Policy. TCG reserves the right to evaluate its relationship with external parties that do not adhere to this Policy and could result in termination of the business relationship. TCG also encourages external parties to comply with laws and regulations of the host country of their operations. For the avoidance of doubt, external parties registered and operating in countries other than the UAE, are encouraged to adhere to both the laws of the host country in addition to the applicable laws of the UAE, throughout the duration of the external party's contractual agreement and/or business relationship with the Group. External parties registered in the UAE are encouraged to remain compliant with UAE laws.

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Roles and Responsibilities
All directors, executives, employees, outsourced employees, or seconded employees working for or on behalf of TCG shall ensure that external parties engaged with for or on behalf of TCG Policy are aware of this Policy. TCG encourages authorized persons of external parties to ensure their directors executive, employees, outsourced employees, or seconded employees working for or on behalf of the external party to uphold principles as set forth in this Policy.

Reporting and Transparency
TCG encourages stakeholders to report concerns, suspicions, or potential violations of this Policy.

Policy Review
TCG will review and revise this Policy periodically if required so that it remains up-to-date and aligned with the company's core values, laws and regulations of the United Arab Emirates (UAE), and with global best practices. TCG shall make available this Policy and future amendments to directors, executives, and employees.

This Policy was last reviewed in October 2023.