

Suppliers Code of Conduct

Version 2 – June 2019

INTRODUCTION

This Supplier Code of Conduct (the Code) sets forth the principles and standards of conduct that Dubai Asset Management expects suppliers, their employees, subcontractors and sub-suppliers to meet during the provisioning of goods and services to Dubai Asset Management. To support compliance with this Code, suppliers shall ensure that the Code is shared with all individuals assigned to perform work for or on behalf of Dubai Asset Management, and that all Dubai Asset Management-related tasks are executed by individuals with the skills, expertise and certifications necessary to uphold the principles and meet the standards of the Code.

COMPLIANCE WITH LAW

Suppliers shall ensure that their representatives (including employees, suppliers, agents and subcontractors collectively referred to as “the Supplier”) conduct business with and/or on behalf of DubaiAM in compliance with all applicable United Arab Emirates (UAE) and Dubai laws, regulations, government policies and DubaiAM policies.

HEALTH AND SAFETY MANAGEMENT

DubaiAM maintains a fully accredited HSE Management System and suppliers are required to comply with all applicable requirements. The safety of the tenants, employees and suppliers is DubaiAM’s highest priority. Working safely and in compliance with all applicable safety rules, laws, standards, regulations, procedures, and rules of this Code of Conduct is a condition of engagement as a supplier to DubaiAM.

Supplier shall identify and manage all potential public safety risks and hazards associated with any activity, service or product deployed in the execution of a service for or on behalf of DubaiAM.

ENVIRONMENTAL AND SUSTAINABILITY

DubaiAM is committed to being an environmental and sustainability leader and demonstrating this through its actions, including conducting its business in full compliance with the spirit of all applicable environmental and sustainability laws, regulations, requirements and operating in an environmentally sensitive manner consistent with its values. DubaiAM requires that suppliers operate in a similar environmentally responsible manner, with appropriate environmental and sustainability management and measures.

LABOR AND HUMAN RIGHTS

DubaiAM expects its suppliers to know applicable Labor and Human Rights Law and uphold the human rights of all workers, whether temporary or contract employees and to treat all their workforce members with dignity and respect, providing them with safe and humane working conditions.

ETHICAL BUSINESS CONDUCT

DubaiAM expects suppliers to conduct business in accordance with the highest ethical standards, including adherence to the following:

Business Integrity

Supplier shall prohibit all forms of bribery, corruption, extortion and embezzlement and shall report to DubaiAM any violation of any anti-corruption law.

Criminal and Civil Claims

Supplier shall inform DubaiAM of any recent, current or pending criminal investigations or charges and any recent, current or pending civil litigation against it or any of its employees.

Company Records and Disclosures

Accurate records and disclosures are critical to DubaiAM meeting its legal, financial, regulatory and management obligations. Supplier shall ensure that facts are never misstated or material information omitted to DubaiAM, and that all records, disclosures and communications to DubaiAM are full, fair, accurate and timely.

Confidential Information

Revealing confidential or protected information obtained while working for DubaiAM is a violation of this Code of Conduct, DubaiAM contractual requirements and potentially the law. Supplier shall report to DubaiAM any suspected data breach immediately following detection.

Responsible Procurement

Suppliers shall take reasonable steps to ensure that products and services procured are from ethical sources and that sub-suppliers are aware of and comply with this code of conduct.

Suppliers shall inform concerned Buyers immediately if they found any deviation in scope from the RFQ compared to actual scope at site.

Supplier shall not proceed for any Variation to existing contract, unless official Purchase Order is issued or approved by DubaiAM Procurement.

CONFLICTS OF INTEREST

Conflicts of Interest DubaiAM expects suppliers to exercise reasonable care and diligence to prevent any actions or conditions that could result in a conflict with DubaiAM's interests, or the appearance of a conflict of interest that may compromise the exercise of independent judgment during the execution of work for or on behalf of DubaiAM specifically:

Conflicting Business Interests

While engaged in DubaiAM -related work, supplier shall not engage in any activity that creates a conflict of interest, or the appearance of a conflict of interest, with DubaiAM or in any way compromises the work that supplier is contracted to perform on behalf of DubaiAM. A conflict of interest can arise if actions are taken or if there are interests that may make it difficult for supplier to perform DubaiAM-related work objectively and effectively. Any potential conflicts shall be disclosed to DubaiAM and written concurrence obtained that states supplier is allowed to remain in a situation that could be perceived as a conflict.

Close Personal Relationships

Close personal relationships between supplier workforce members and DubaiAM employees responsible for monitoring supplier's performance should be avoided in order not to compromise the exercise of independent judgment, or lead to claims of a conflict of interest.

To avoid these problems and to foster a positive work environment, supplier shall report to DubaiAM any close personal relationships that result, or could result, in a conflict with this Code.

ENGAGEMENT WITH EXTERNAL PARTIES

Supplier shall neither disclose the contractual relationship with DubaiAM nor the scope of the contract to third parties unless written consent is provided by the Legal and Marketing Departments

News Media: No supplier shall engage with the media to disclose any information related to the commercial relationship with DubaiAM and/or represent DubaiAM unless written consent is provided by the Group External Affairs Department.

GENERAL ADMINISTRATION

DubaiAM Assets

DubaiAM assets such as computers, telephones and mobile phones, fax machines, copy machines, conference rooms, vehicles, equipment, tools and similar assets are for DubaiAM's use only, unless explicit permission to use them has been secured in advance from DubaiAM.

Records Retention

If supplier generates or receives information, data and/or records pertaining to DubaiAM as a result of the work performed by supplier, supplier must ensure that those records are returned back to DubaiAM pursuant to the fulfilment of DubaiAM's requirements.

Management Systems

Supplier shall support compliance with this Code of Conduct by establishing pertinent policies and processes appropriate for the nature and scale of operations.

COMPLIANCE WITH CODE

DubaiAM expects its suppliers to comply with the Supplier Code of Conduct and take necessary steps to ensure that the Code is shared with all individuals assigned to perform work for or on behalf of DubaiAM, and that all DubaiAM-related tasks are executed by individuals with the skills, expertise and certifications necessary to uphold the principles and meet the standards of the Code.

To support compliance with this Code, DubaiAM expects its suppliers to establish appropriate management processes and systems to monitor compliance.

SUPPLIER PERFORMANCE EVALUATION

In line with DubaiAM's Procurement Policy, all suppliers meeting Selection Criteria will be subjected to annual performance evaluation. Performance evaluation will objectively assess suppliers' performance in executing services and delivering goods. The evaluation will be strictly based on Evaluation Criteria and scores will be collated from relevant stakeholders engaged in the execution of services.

Should the supplier not meet the required score, they could be classified as 'On Probation'. At this time, a feedback will be issued to the supplier(s) and time period will be allowed to submit corrective action plan to improve on the shortcomings. During this time however, the prequalification status will be changed to 'unqualified'. Following demonstration of improvement and re-evaluation, supplier(s) will be extended an opportunity to re-qualify for commercial inquiries.

Should the supplier score very poorly, they will be classified as 'Blacklisted'. Supplier(s) will be extended an opportunity to meet and understand the reasons. The supplier(s) will be required to demonstrate improvements should they wish to re-qualify for commercial inquiries.

DubaiAM also reserves the right to conduct unplanned supplier performance evaluation at any time should it observe irregularity in delivery or execution, non-performance and/or non-compliance to HSE Policy.

Selection Criteria

Annual spend of more than a certain value.

On-going committed contract(s) of more than a certain value.

Suppliers which whom more than a certain number of Contracts of Purchase Orders are placed.

Evaluation Criteria

Compliance to expected Quality of Goods and/or Service

Adherence to Delivery Timeline and/or Project Execution Schedule

Quality of Post-Sales Service