

# The Emirates Group Business Code of Conduct

At the Emirates Group, we are committed to the highest ethical standards and responsible business practices, because it ensures our success and is the right thing to do.

This Business Code of Conduct (“the Code”) is intended to govern how we conduct business throughout the Emirates Group. Together with the Emirates Group policies, it sets out the standards expected of all employees when conducting Group business.

As ambassadors of the Emirates Group, all employees have a part to play in protecting the reputation of the Group as a responsible business, and are expected to comply with this Code, and to encourage colleagues to do the same.

This Code is not an exhaustive set of rules but is a guiding set of business principles to ensure that decisions are taken with integrity and compliance. Our policies are reviewed from time to time and any updates are communicated to employees and stakeholders accordingly.



**HH Sheikh Ahmed Bin Saeed Al Maktoum**

Chairman & Chief Executive, Emirates Airline and Group

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## 1. Corporate Values

We stand by our values of Safety, Service Excellence, Innovation, People, Financial Strength. Our five values underpin everything that we do and reinforce our purpose, decision making and the way we engage with our stakeholders and the community.

- Safety - we will protect our customers, employees, and assets through a ceaseless commitment to international and all other appropriate safety standards and the adoption of practices which emphasise safety as a paramount personal responsibility.
- Service Excellence - we deliver products and services of consistently high quality to secure the enthusiasm and loyalty of our customers.
- Innovation - we will continue to be a market leader, providing products and services which successfully and profitably integrate the most advanced developments.
- People - we will recruit people of high calibre and develop existing employees to enable them to continuously improve the business in an environment which encourages teamwork, loyalty and commitment to our ongoing development and success.
- Financial Strength - we will provide service and products of high quality which offer good value for money and will advance the Group's profitability through both prudent spending and determined selling.

## 2. Compliance with Laws, Regulations and Ethical Standards

The Emirates Group's global footprint means that we are subject to laws, regulations, and ethical standards in all countries in which we operate. We will always carry out our operations in compliance with applicable laws, regulations, and ethical standards within the United Arab Emirates and in any country where we conduct business.

Compliance with applicable laws, regulations and ethical standards is non-negotiable. Should any employee find any conflict between local laws and this Code or any Group policy then they are expected to raise the matter with their line manager, HR or Group Legal. Failing to comply with laws and regulations will result in disciplinary action.

The Emirates Group has voluntarily committed to the principles set out in the United Nations Global Compact in the interests of promoting human rights, responsible labour practices, environmental sustainability, and anti-corruption.

## 3. Safety

Safety is at the centre of everything at the Emirates Group.

We are committed to complying with local and international laws by providing a safe and healthy environment for all our customers and employees. We trust our employees to raise any safety concerns through the right channels in a timely manner.

Employees will work responsibly to ensure their own safety and the safety of others by complying with our established Emirates Group Safety Policy, available to all employees.

## 4. Environmental Sustainability

We are committed to minimising the environmental impact of our operations across all our businesses and activities, including our supply chain. This is not only the right thing to do, but it's also core to our long-term business success.

Our Group Environmental Policy lays out our commitment to environmental sustainability. This Policy is supported by the Emirates Group Environmental Sustainability Framework, which directs our efforts into three focus areas, being:

- reducing emissions;
- consuming responsibly;
- preserving wildlife and habitats.

Every Emirates Group employee and business area has a role to play in looking after our environment and supporting our strategy.

## 5. Data Protection, Privacy and Confidentiality

We place great importance on our customers', employees' and partners' privacy and the security of their personal data. The Emirates Group is determined to maintain operations which treat individuals' privacy with respect, fairness, transparency and integrity, honouring the trust they place in the Emirates Group by sharing their data with us.

The Emirates Group respects the confidentiality of all other information of our customers, employees, and partners.

All Emirates Group employees are expected to maintain the highest standards of confidentiality of information and other sensitive data of our customers, employees, and partners.

## 6. Cyber Resilience

The protection of Emirates Group information assets is non-negotiable and the key to ensuring our competitive advantage. We aim to provide a secure and resilient environment to protect our operations as well as the information of our employees, contractors, and vendors in line with the applicable laws and regulatory authorities that govern our business and members of the public.

We have a robust Security Governance Framework that includes Policies, Standards, Procedures and Guidelines that all employees, contractors, and vendors are expected to comply with.

## 7. Disclosure of Emirates Group Confidential Information

All employees must not disclose Emirates Group confidential information to any third party, either verbally or written, without acquiring permission in line with internal procedures. If the disclosure of Group confidential information is expressly required in terms of any law or regulation, then Group Legal must be notified of the disclosure.

## 8. Public Statements and Social Media

All Emirates Group employees are expected to safeguard the Group's reputation at all times.

Emirates Group employees must not present themselves as a representative of any entity within the Emirates Group, unless authorised to do so, by the Corporate Communications Marketing and Brand (CCMB) department.

Emirates Group employees are responsible for anything they write, publish or present on social media and must be aware that their views posted on social media could be seen as those of the Emirates Group. Emirates Group employees must comply with the Social Media Guidelines when posting anything on social media.

## 9. Sustainable Procurement

We strive to embed the core principles of sustainability in our procurement process and ensure that our supply chain share our vision on responsible and ethical sourcing while in full compliance with all applicable legal requirements. Our Supplier Code of Conduct guides our suppliers to align with our values.

All Emirates Group employees are expected to maintain the highest levels of integrity, ethics and commitment to sustainability while working with our suppliers.

## 10. Anti-bribery and Corruption

We are committed to complying at all times with applicable anti-bribery and anti-corruption laws in all countries where we conduct business.

All Emirates Group employees are expected to comply with the Group's Anti-Bribery and Corruption Policy, which forms part of the Group's employment conditions. This Policy provides clear rules for Group personnel and third parties engaged in Group business, to ensure compliance with applicable anti-bribery and corruption laws. Of note, Emirates Group employees and business partners are prohibited from:

- a) making or receiving bribes in connection with Group business;
- b) offering or receiving any financial or other advantage to or from another party with the intention to influence or reward the improper performance of an activity; and
- c) making donations or contributions to any political parties or public international organisations.

In addition to the above prohibitions, the Policy also contains additional guidance on dealing with government officials, lobbying, facilitation payments and acceptable gift and hospitality activity. It is the responsibility of all Emirates Group employees to understand and comply with the Policy.

## 11. Antitrust and Competition

We compete fairly and abide by the antitrust and competition laws of the countries in which we operate. Antitrust and competition laws promote fair competition and protection from unfair business practices.

The Emirates Group has established an Antitrust and Competition Law Policy and a Global Antitrust/Competition Law Compliance Programme to ensure our employees are aware of relevant antitrust/competition laws and to provide guidance on how to observe them in practice.

In summary, the following activities are likely to raise antitrust/competition law issues:

- a) Competitor Contact. Emirates Group employees must not make any form of arrangements with competitors to fix price, market share, bid-rig or boycott third parties;
- b) Dominance. Emirates Group employees must ensure that the Group does not misuse market power;
- c) Joint Ventures & Mergers. Emirates Group employees should consider antitrust/competition law implications of these arrangements. In addition, Group Legal should be consulted to ensure that these arrangements comply with applicable laws and that necessary filings are obtained prior to implementing these arrangements.

## 12. Sanctions and Trade Controls

We respect and abide by all relevant trade sanctions and import/export restrictions imposed by governments that are applicable to our business.

Sanctions and trade controls are official orders applied by one or more countries against a targeted country, group or individual and may include various forms of trade barriers and tariffs. As a global operation, sanctions and trade controls impact on the operations of the Emirates Group.

All Group employees, contract workers, officers, and directors, as well as anyone acting on behalf of the Group or any Group Company, are required to comply with all applicable laws and regulations and our Sanctions Policy.

## 13. Modern Slavery and Human Trafficking

We maintain a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity, and endeavour to comply with relevant human trafficking laws and regulations in all the countries in which we operate.

All Emirates Group employees are required to comply with the Group's Anti-Slavery and Human Trafficking Policy, to ensure compliance with the laws, and with the Group's ethical standards and expectations.

## 14. Equal Employment Opportunity

We are proud to have an inclusive and diverse workforce, where people from all cultures and backgrounds around the world come together to contribute to the success of our business.

To support this, we ensure that equal opportunities are provided for employment, development, and promotions.

## 15. Harassment and Bullying

We are committed to providing a workplace that is free of harassment and bullying, and where everyone is treated with dignity and respect.

The Emirates Group does not tolerate any form of harassment and bullying behaviour on any grounds. Any suspicion or report of harassment will be thoroughly investigated.

Details of the policy and procedures are provided in the Group's Harassment and Bullying Policy and the Confidential Disclosure Policy.

## 16. Conflict of Interest

We protect employees and the business by providing the means to identify, declare and manage any actual, potential, or perceived Conflict of Interest.

As the Emirates Group, we acknowledge that employees may have business interests outside of their role with the Company and recognise that financial investment in another venture and other business interests may be acceptable providing it does not compete and is not in conflict with the interests of the Emirates Group.

Having a personal relationship with other employees, candidates, customers, suppliers, regulators, or competitors does not necessarily give rise to a Conflict of Interest, but where it may or does, it should be declared. Failure to declare an actual, potential, or perceived Conflict of Interest, may result in disciplinary action up to and including termination to protect our interests and of those involved.

Further guidance on Conflict of Interest can be found on the Group's Conflict of Interest site.

## 17. Accounting Records

We ensure that all accounting records adhere to the requirements of International Financial Reporting Standards (IFRS) and have an internal Finance function who provide assurance services on Group balance sheet and facilitates external audits.

## 18. Whistleblowing Programme

We encourage anyone with legitimate concerns about practices within the Group to voice those concerns confidentially and without fear of retaliation.

All Emirates Group employees are encouraged to raise any concerns with their line manager or HR. If this is not possible, they can raise their concerns confidentially through: (a) the Speak Up online reporting tool on groupworld or the One dnata Portal, or (b) email [speakup@emirates.com](mailto:speakup@emirates.com) or [speakup@dnata.com](mailto:speakup@dnata.com).

## 19. Related Documents

This Code is supplemented with a number of other documents including:

- all Emirates Group policies;
- the Employment Regulations;
- Confidential Disclosure Procedures;
- Conflict of Interest Reporting Procedures;
- Global Antitrust and Competition Law Compliance Programme;
- Emirates Group Environmental Sustainability Framework, and Emirates and dnata Environmental Management Systems;
- Personal Data and Privacy Policies, Processes, and Procedures;
- Social Media Guidelines; and
- any other Emirates Group procedures and guidelines supporting the Code.