Code of Business Conduct

The Way We Lead
Subsidiaries and Joint Ventures

Wholly owned subsidiaries

Dragon Oil
Dubai Natural Gas Company Limited
Emirates Gas LLC
ENOC Bunkering International LLC
ENOC Commercial and Distribution LLC
ENOC Lubricants and Grease Manufacturing Plant LLC
ENOC Processing Company LLC
ENOC Singapore
ENOC Tasjeel LLC
Horizon Emirates Fujairah Distribution
Horizon Emirates Fujairah Trading
Horizon Emirates Jebel Ali Petroleum
Horizon Emirates Terminals Limited Distribution
Horizon Jebel Ali Terminals Limited

Joint Ventures

Arabtank Terminals Limited
EPPCO Aviation
EPPCO International Limited
EPPCO Lubricants
Horizon Djibouti Terminals Limited
Horizon Singapore Terminals Private Limited
## THE CODE ELEMENTS

### People
- Fair Treatment / Tolerance / Alcohol and Drugs
- Workplace Violence Prevention / Environment, Health and Safety (EHS) / People in Practice

### Integrity
- Conflict of Interest / Business Courtesies, Gifts and Entertainment / Employment of Immediate Relatives / Outside Activities / Integrity in Practice

### Third Party Relations
- Suppliers / Supplier Selection / Customers Business Partners / Third Party Relations in Practice

### Information Management
- Records Management / Proprietary and Confidential Information / Use of IT and Security / Public Statements / Social Media / Information Management in Practice

### Trust
- Company Property / Personal Information and Data Privacy / Intellectual Property & Trademarks / Trust in Practice

### Compliance
- Whistle Blowing / Anti-Fraud / Anti-Corruption Compliance / Antitrust and Competition Laws / Audits and Investigation (External, Internal & Government) / Compliance in Practice
Dear Fellow Employees,

ENOC Group is a diversified organisation joined together by the shared vision of many talented individuals. The success of our organisation would not be possible without strong corporate governance which ensures the highest ethical standards in carrying out its business activities thereby providing a solid foundation for future growth.

The world over, corporations are becoming more mindful and committing to conduct business ethically as they are closely evaluated by the public they serve. ENOC’s Code of Business Conduct is in line with international norms that govern this corporate philosophy.

It is important that every employee understands these norms and behaves in accordance with them. The Code of Business Conduct is not just a guideline on what to do and what not to do. It is designed to show us the direction we should pursue to ensure that governance and integrity are central to our world of business.

We aspire to be known as a fully integrated oil & gas group and as we grow and expand internationally, our first steps will show us the way. As we become more transparent, we will encourage our partners and stakeholders to trust us and this will facilitate further growth. The Code can only be effective and useful with committed dissemination, implementation, monitoring and embedding at all levels, which, will thereby positively influence employee behavior and contribution to the organisation.

Eventually, we are part of a larger community where we have shared benefits and responsibilities, and ENOC strives to serve the community at all times. While we are committed to aligning ethical principles with developing our business, our principles of integrity and transparency should transcend our business motives to report on any unethical practice. Any violation of the ENOC Code of Business Conduct should be brought to notice without any fear of retaliation. We also encourage you to ask questions and clarify any doubt you may have. Details on communication outlets are available at the end of the Code.

Be proud of being a part of an organisation that believes in following the highest ethical conduct. Be part of ‘The Way We Lead’.

Saif Humaid Al Falasi
Group Chief Executive Officer
OUR VISION

“To be a leading regional integrated oil and gas group highly profitable and socially responsible towards employees, community and environment.”

OUR MISSION

// Achieving sustainable development and highly profitable growth.

// Serving growing energy needs of Dubai.

// Attracting, developing and retaining top talent to become the employer of choice.

// Adopting latest technologies and implementing best practices thus achieving world-class performance.

// Meeting and exceeding customer expectations in terms of quality and service.

// Maintaining high industry standards in Environment, Health and Safety.
OUR OBJECTIVES

/ Align with UAE energy needs and contribute in economic development.

/ Improve operational performance and achieve sustainable profitable growth.

/ Continue to build scales in strategic assets to deliver high return on capital employed.

/ Expand to new markets and enhance competitive positioning by leveraging supply chain strengths and brand image.

/ Build profitable E&P portfolio and create synergies.

/ To be the employer of choice.

OUR VALUES

Our values are embedded in the letter and spirit within the Code

Team Work

Working together by sharing ownership, responsibilities and outcome.

Integrity

Being honest, truthful, reliable and fair while dealing with all stakeholders.

Transparency

Being open, straightforward and consistent in all we do, by communicating with clarity, simplicity and precision.

Respect

Acknowledge, recognize, and value all stakeholders.

Customer focus

Position customer first in all that we do.
OUR CODE OF BUSINESS CONDUCT

The Code represents our ethical aspirations and commitment towards our stakeholders. All of our employees at every level and across every area of our businesses shall uphold the highest ethical standards in their day to day activities.

The Code is a baseline, the business policies and practices may require more strict compliance than required by the Code, in those instances, entities must follow the stricter policy, practice or law.

It includes references to the relevant policies and procedures and other helpful resources however the Code is not a compilation of all ENOC policies.

The rights of our employees and ENOC’s rights as an employer are governed by the laws of the country of employment, the policies of the employing entity and the individual’s written employment contract.
WHO SHOULD FOLLOW THE CODE?

The Code applies to all our employees, including those in wholly owned subsidiaries and joint ventures where the Code has been implemented. These stakeholders are responsible for complying with all applicable laws and regulations in each country where ENOC does business and for knowing and complying with the Code and other ENOC policies. If a local law conflicts with a policy in the Code, the local law shall take precedence.

Our entities and employees are responsible for being familiar with its contents. The most current version of the Code is available on ENOC website and ENOC Internal Portal.

Violation of the Code is subject to disciplinary action. Business Segments are responsible for ensuring that their policies and practices are consistent with the Code.
Business Ethics & Compliance Function

Business Ethics & Compliance function has been established to provide permanence to the Code and reinforce it in business practices. The Function is headed by the Chief Ethics & Compliance Officer and is supported by an independent Business Ethics Committee. The Function reports to ENOC Board Audit Committee and administratively to the Group Chief Executive Officer.

Quick Find: For any suggestions and feedback, contact BE&C through the enquiry email (ethicsenquiry@enoc.com)

Business Ethics Committee (BEC)

The purpose of the Business Ethics Committee is to maintain an ethical business environment through review and approval of certain Business Ethics & Compliance activities. The BEC’s primary responsibilities are to review ethical standards, oversee the activities of ENOC Ethics Hotline, reported cases, investigations and Conflict of Interest disclosures. The BEC’s authorities and responsibilities are defined under the Business Ethics Committee Charter.

The Committee consists of 5 members as following:

/ Group Chief Executive Officer
(Chairman – BEC)

/ Chief Ethics & Compliance Officer
(Member – BEC)

/ Chief Financial Officer
(Member – BEC)

/ Director – Group Legal
(Member – BEC)

/ Director - Group Human Resources
(Member – BEC)

/ Manager— Ethics & Compliance
(Secretary– BEC)

Do you need more information?
Reference Document:
Business Ethics Committee Charter
What Are Our Responsibilities Towards The Code?

Our Employees’ responsibilities
We are dedicated towards the highest ethical conduct and our employees should:

/ Understand and comply with the Code.
/ Act responsibly within the limit of given authority.
/ Seek guidance when in doubt from the Line Manager or Business Ethics & Compliance Function.
/ Report unethical conducts or breaches of the Code via ENOC Ethics Hotline reporting mechanisms.

Our Managers’ responsibilities
In addition to the above responsibilities, our managers should also:

/ Lead by example and consider ethical implications in all business decisions.
/ Recognize and reinforce employees’ ethical behavior.
/ Respond promptly to employees seeking advice and guidance in reporting misconducts.
/ Foster an environment where employees feel comfortable to speak up and raise their concerns.
/ Prevent retaliation towards any employee who reports misconduct or assists in an investigation.

How To Ethically Evaluate Decisions?

Ethics Decision Tree
In day to day operations, we sometimes encounter situations that will test our ethical judgment and integrity. The below decision tree can be a useful tool to evaluate our decisions.

1. Is my business decision ethical?
   - Yes
     - Is my business decision legal?
       - Yes
         - Does it comply with ENOC policies and culture?
           - Yes
             - Go ahead
           - No
             - Not sure
               - Seek Business Ethics and Compliance Team support
             - No
               - Don’t do it
       - No
         - Not sure
           - Seek Business Ethics and Compliance Team support
         - Yes
           - Don’t do it
ENOC Ethics Hotline Reporting Mechanism

ENOC Ethics Hotline has been designed to cultivate a positive work environment through enabling employees to report any unethical conduct or a violation of the Code in an easy and confidential manner.

The Hotline is a confidential multi-lingual independent platform available through phone and online reporting system. It is managed by an external service provider with professional and experienced consultants who are able to obtain sufficient information effectively and take initiative in appropriately dealing with sensitive disclosures. The reporter can follow up on the case and interact confidentially with Business Ethics & Compliance team through the online system.

Retaliation

We are committed to integrity and we aim to foster an environment that allows employees to report misconduct without the fear of retaliation.

ENOC has a non-retaliation policy to protect employees who report misconduct in good faith. If you encounter retaliation for reporting misconduct, please contact Business Ethics & Compliance team immediately. Anyone who retaliates against another employee for reporting misconduct will be subject to disciplinary action.

Do you need more information?

Reference Document: Whistleblowing Policy

ENOC Ethics Hotline

United Arab Emirates
800 ENOC Ethic (800 3662 38442)

Singapore
1800 3662 222 (1800 ENOC CBC)

Ethics Point Website
www.enoc.ethicspoint.com
Q1: Why should I report?
The success of ENOC is based on employees’ drive towards a shared vision built on ENOC’s values. By reporting misconduct, you are not only fulfilling your obligations but you are also contributing to foster a positive workplace. Unethical behaviors have negative consequences on people, performance and profitability. Your voice is very important to the wellbeing of ENOC.

Q2: When should I speak up?
You may speak up the earliest in any of the following situations to allow us to quickly address the issues:
1 / If you are not sure of the ethical implications of your decision and need an advice.
2 / If you witness misconduct or expect misconduct to occur.
3 / If you have been involved in misconduct.

Q3: What information do I need to report and can I remain anonymous?
The reporter should provide clear and complete information on the nature and details of the case including evidences as much as possible to enable us to act upon it promptly. We encourage reporter to disclose his/her identity. However, the reporter has the right to remain anonymous.

Q4: Where do these reports go?
ENOC Ethics Hotline service provider registers all reported cases received through ENOC Ethics Hotline reporting mechanisms in an online platform. The Business Ethics & Compliance Function receives notification for any update on the online platform including new registered cases or updates on existing cases. The Business Ethics Committee has access to the online platform. If a member of the Business Ethics & Compliance Function or the Business Ethics Committee is involved in a case, he/she will be excluded from all matters related to the case.

Q5: I have witnessed misconduct and would like to report it but I am scared?
We understand that reporting against your employer or colleague is a sensitive matter therefore, we have established ENOC Ethics Hotline and the Whistleblowing Policy. The Hotline provides structured confidential process for reporting. The Policy protects the reporter from retaliation.

Retaliatory actions maybe in the form of but not limited to termination, demotion, reductions in pay/hours, withholding promotion, reassignment to unsuitable post or position, intimidation, harassment, or otherwise mistreating the reporter.

If you encounter retaliation for reporting misconduct, please contact Business Ethics & Compliance team immediately.
FAIR TREATMENT

We are committed to treat our employees in a fair and respectful manner.

We treat each individual fairly and recruit, select, train, promote and compensate based on merit, competency and other work-related criteria. ENOC Human Resource Policies are benchmarked against best practices. We comply with the laws governing employment and labor practices within the countries we operate in.

Freedom from discrimination includes freedom from any form of harassment. Harassment includes conduct that is intended to interfere or that has the effect of interfering with a fellow employee’s work performance or creating an environment that is intimidating, hostile, or offensive to the employee.

Do you need more information?

TOLERANCE

We embrace our diverse workplace environment with respect.

We strongly support each employee’s right to his or her personal beliefs and values. However, personal beliefs aside from those covered by the Code should not be forced on others in the workplace.

Our employees should not use or facilitate ENOC communication tools (letters, e-mail, bulletin boards etc.) to advocate religious, ethnic, political or other potentially sensitive personal preferences.
Our employees should not create, disseminate or circulate malicious rumors and gossip, which affect fellow colleagues, thus creating an atmosphere of stress and employee disengagement.

Do you need more information?
ALCOHOL AND DRUGS

ENOC strictly prohibits the use of alcohol and drugs in the workplace.

We conduct our business with high standards of safety, concern for the environment and the health of our employees. Our Policy is to maintain an alcohol and drugs-free work environment.

Apart from being a serious violation of the local regulations, the abuse of alcohol, drugs (illegal or legal) or other substances in and outside of the workplace can impair performance and is a serious threat to health and safety. As a socially responsible organisation, we are fully committed to ensure that all our work places are completely “Alcohol and Drugs Free”.

We have a “zero tolerance” Policy on drugs, alcohol or other substances for employees on duty.

All employees must be aware of and abide by ENOC’s Alcohol and Drugs Policy Statement. We strive to maintain working conditions which are safe and compliant with all applicable laws for our employees and visitors to our premises.

Do you need more information?

WORKPLACE VIOLENCE PREVENTION

Harassment is any action that is offensive and creates intimidating work environment.

We are committed to a safe working environment free of threats, intimidation and physical harm. Everyone has the right to work in a safe environment and shares the responsibility for assuring each other’s safety.

We adopt a policy of zero tolerance for workplace violence. This means that we will investigate and take appropriate action against any threat to a safe workplace.

We prohibit violent behavior including, but not limited to, physical assaults, fighting, threatening comments, intimidation, and the intentional or reckless destruction of property belonging to us, our employees or our customers.

Any comment or behavior that could reasonably be interpreted as intent to do harm to people or property should be considered a threat and must be reported to your Line Manager, Human Resources or Business Ethics & Compliance team through our reporting mechanisms.

We also prohibit the unauthorized possession and/or use of weapons by any individual in our premises.

Do you need more information?
ENVIRONMENT, HEALTH AND SAFETY (EHS)

Employees have the right to work in safe conditions. We expect employees to stop the job instantly if a potential hazard arises until the hazard is removed.

EHS plays a fundamental role in the businesses within ENOC. The overall strategy for managing EHS risks is embodied in ENOC Group EHSQ policy. This policy commits us, management and staff, to operate our facilities in a manner, which protects and preserves the natural environment, and promotes the health, safety and security of our employees, customers, suppliers, contractors and the general public. We firmly believe that implementation of EHS guidelines is important to ensure sustainability of operations and direct the way we run our businesses.

At minimum, we will abide by local and national EHS laws as well as comply with internationally accepted standards and practices. We shall as an organisation, apply the standards of best practices where applicable and as far as reasonably practicable.

To support the goals outlined in the ENOC Group EHSQ policy, we developed guidelines to ensure:

/ Consistent implementation of EHS rules and regulations across ENOC.

/ Alignment of EHS policies, plans and programs with corporate business plans.

/ Constant awareness by management of the EHS performance of ENOC.

/ Proper definition of duties, responsibilities and expectations.

/ Providing sufficient logistical resources to handle all credible emergency scenarios.

/ Defining compliance review frameworks and mechanisms.

/ Existence of approved codes of practice to guide operating companies/affiliates on effective implementation of EHS practices.

/ Providing EHS leadership programs to all supervisors, managers and executives to ensure maintaining a continued commitment and drive for EHS throughout ENOC and its operating units.

Do you need more information?
Reference Document: EHSQ Policy
**People In Practice**

**Q1**: What should I do if my manager is using offensive words and threatens me?

Such behaviors are not part of professional conduct. It’s advisable that you report the case to Human Resources’ representative who can guide you through the grievance process for proper action.

**Q2**: I work the moonlight shift and my colleague offered me herbal pill to help me stay awake, can I take them?

No, as per Alcohol and Drug Policy available under Human Resources Policy Manual, employees are strictly prohibited from distributing illegal or legal drugs within the company’s premises. Incase of any doubt employees should disclose details of the medication to the Occupational Health services.

**Q3**: Can I consume Alcohol in the company accommodation outside my working hours?

No, consumption of Alcohol is prohibited in our premises including the company accommodations. You may refer to Alcohol and Drug section in Group Human Resource Policy.

**Q4**: I work in the sites and my personal protection cloth is too hot so I don’t bother wearing it.

The personal protection cloth is designed to protect you from hazards and ensure your safety. Ignoring such requirement violates the EHSQ Policy and the ENOC Code of Conduct.

If you have an issue with your work clothes or any of the personal protective equipment provided, you must report it to the EHS department within your organisation and also to your Line Manager who will request that the matter to be investigated by the specialists. Accordingly, an approval to solve this issue can be undertaken.
02

/ Conflict of Interest
/ Business Courtesies, Gifts and Entertainment
/ Employment of Immediate Relatives
/ Outside Activities
/ Integrity in Practice

Integrity
CONFLICT OF INTEREST

A “Conflict of Interest” exists in cases where the personal interests of an employee clash with the interests of the company.

We require that our employees do not engage in, or give the appearance of engaging in, any activity involving any conflict, or reasonably foreseeable conflict, between their personal interests and the interests of ENOC. Our employees are expected to give their undivided loyalty to ENOC in conducting their duties.

Very often, a conflict of interest occurs when employees make decisions on behalf of ENOC, while also having a controlling or financial interest in, or receive financial benefits from, an organisation that wants to do business with ENOC.

If an employee is in doubt on whether a situation is considered a conflict of interest, then he/she has the obligation to raise the matter and contact Business Ethics & Compliance team for clarification purposes.

Completing and updating the Conflict of Interest Disclosure Form is mandatory for all our employees irrespective of their position or grade. Our employees are also obliged to submit the form when a matter results or may result in real or apparent conflict of interest.

BUSINESS COURTESIES, GIFTS AND ENTERTAINMENT

A business courtesy is a gift or service provided to or received from a business associate.

We do not seek to improperly influence the decisions of our contractors or vendors by offering or accepting extravagant business courtesies.

All our employees and representatives should understand the ethical issues associated with gifts and entertainment and how these can affect our reputation and relationship with customers and suppliers.

The issue of gifts and gratuities may have legal implications when the Government, or a Government entity is involved and serious consequences can result from mishandling these relationships. Offering or accepting bribes and pay-offs is prohibited.

Business gifts that compromise, or even appear to compromise our ability to make objective and fair business decisions are inappropriate. Any doubt should be resolved in favor of not giving or receiving the gift.

Employees should exercise good judgment when accepting or offering a gift. The gift should be business related and consistent with normal business practices.

Do you need more information?
Reference Document: Conflict of Interest Policy
However, employees may accept or give:

/ Limited refreshments and meals, when these items are provided during a business meeting.

/ Reasonable and infrequent meals and entertainment when offered by a business associate for a legitimate business reason and when local custom or practice would make it inappropriate to decline the offer.

/ Promotional business items with only token value as per the limit provided under Gift & Entertainment policy.

Employees should not accept or give unauthorized:

/ Monetary, personal or any other type of favors and gifts from a supplier, customer or any other third party that may result or give appearances of impartiality and favoritism. This is applicable to Immediate Family as well.

/ Cash or cash equivalent items such as stocks.

Do you need more information?
Reference Document: Conflict of Interest Policy and Gift and Entertainment policy
EMployment of Immediate Relatives

Immediate Family relatives’ term is defined in ENOC Group Human Resource Policy as immediate familial relations including father, mother, sister, brother, wife, husband, son or daughter.

To ensure that all employees are hired, rewarded and promoted fairly, we do not encourage the employment of immediate relatives. Additionally, we have developed guidelines to reinforce transparency and maintain fairness in managing relatives as follows:

/ Immediate relative seeking employment must undertake the same assessment process as any other external applicant.
/ Immediate relative shall not be employed in the same business segment/corporate segment.
/ Employee shall not advocate for or cause the advancement, appointment, employment, promotion, or transfer of an immediate relative.
/ Employee may not participate in a rating panel/selection process in which an immediate relative is a candidate.
/ Employees are required to disclose immediate familial relationships with another employee within ENOC or with our competitor, supplier or customer.

Outside Activities

Outside activities could be associated with risks and need to be disclosed in line with Conflict of Interest Policy.

ENOC employment contracts do not support the employment of its employees at any other organisation while working at ENOC. However, in such cases where outside employment would be of benefit to ENOC and/or the individual employee, the employee should follow the guidelines on working for third parties under the Human Resources Policy Manual.

Conflict of interest related to outside activities should be disclosed in any of the following situations:
/ Having full or part-time employment aside from the current position the employee holds in ENOC without proper approval from Human Resource.
/ Having personal business that competes with ENOC’s scope of work or deals with ENOC in any capacity.
/ Having 5% or more of shares in a business that competes with ENOC’s scope of work.
/ Being able to influence decision making process of a company that competes with ENOC’s scope of work.

Do you need more information?
Reference Documents: Conflict of Interest Policy and Human Resources Policy Manual (Employment Contract)
Q1: When do I need to disclose conflict of interest?

It is mandatory for all employees irrespective of their position or grade to fill the form in any of the followings conditions:

/ If invited by Business Ethics & Compliance Function.

/ If any change takes place to the previously submitted form or a new condition arises that results or may result in conflict of interest.

/ If in doubt, raise the matter and get clarifications on it.

Q2: I deal a lot with external parties and I receive gifts, do I need to disclose them?

Employees need to be aware of Business Courtesies, Gifts and Entertainment section of the Code and the Gift & Entertainment policy in regards to guidelines on receiving gifts. Gifts provided from our external parties that are part of normal business norms with token value and are not intended to influence business decisions, such as corporate calendars, pens & key chains, are generally acceptable.

Q3: Can I keep a pen worth AED/- 10,000 gifted to me from one of ENOC's loyal customers if he didn't ask for anything in return?

No, it is not acceptable because it is above the acceptable limit and it may appear to compromise your integrity therefore such gifts should be rejected and disclosed to Business Ethics & Compliance Function.

Q4: I have a tailoring business; do I have to disclose this information?

Considering the tailoring business is not within ENOC scope of business, you are not required to disclose such information via Conflict of Interest Disclosure Form as long as you are not dealing with ENOC.
Third Party Relations

/ Suppliers
/ Supplier Selection
/ Customers
/ Business Partners
/ Third Party Relations in Practice
SUPPLIERS

We build productive relationships and deal fairly with our third parties.

We compete fairly and in accordance with the highest ethical and professional standards in our third party relationships. Our entities shall ensure that business generated is based on superior services and products with competitive prices, not through improper, unethical, or questionable business practices. Moreover, our entities shall strive for:

/ Honesty, integrity, fairness and compliance with established tendering, procurement and contracting policies, procedures and practices.

/ Championing social responsibility and sustainability practices in procurement.

/ Avoiding any dealings that might prevent or obstruct the effective operation of fair competition.

/ Encouraging and supporting reliable contractors and suppliers, locally and internationally.

/ Long-lasting business relationships built on trust and mutual benefit giving preference to competitive and quality goods and services, promoting positive supplier and customer relationships.

/ Avoiding behaviors or actions that may negatively influence, or appear to influence, procurement decisions

Do you need more information?

SUPPLIER SELECTION

We select our suppliers based on appropriate business criteria.

Our entities will ensure that our suppliers are selected objectively based on appropriate criteria, such as qualifications, competitive price and reputation.

Terms of ENOC’s business relationships with suppliers shall be established as per Group Procurement Procedures. Mutual responsibility of confidentiality shall be maintained to protect information shared between ENOC and its suppliers.

Suppliers who conduct business with /or represent ENOC to conduct their business are required to comply with all applicable laws and regulations. We aim to build relationships with suppliers who are consistent with our commitment to the highest ethical and professional standards.

Do you need more information?
Reference Documents: ENOC Group Procurement Procedures and ENOC Supplier Code
CUSTOMERS

We aim to influence our customers positively with the way we operate our business.

We are committed to deliver superior products and services in meeting and exceeding our customers’ requirements. Customer satisfaction is crucial for our business growth and we are constantly enhancing our delivery of services.

We ensure that our customers are fully informed about the products and/or services they are being offered in a transparent manner.

Do you need more information?
Reference Documents: Respective Contracts and Agreements

BUSINESS PARTNERS

Trust and integrity are our core values in building relationships with our business partners.

We build relationships with our business partners based on shared trust and values. We are committed to communicate openly and honestly.

We uphold the highest professional standards and rules in dealing with our business partners and we do not consent to unethical or illegal business practices in any circumstances.

We ensure sharing the same commitment to safety, ethics and compliance in our dealings with our business partners and other third party entities.

Do you need more information?
Reference Documents: Respective contracts and agreement.
Q1: Can I work with supplier who provides lower rates even though he may have questionable business practices?

No, we are committed to high ethical values and standards. Our entities should avoid such business relationships.

Q2: A long-term supplier is no longer meeting our evolving business requirements; should we renew our contract with them given the pressure of loyalty?

ENOC is committed to building long lasting relationships with our suppliers however it is crucial to reassess suppliers to ensure fair and objective selection of competitive suppliers who can meet the business requirements.

Q3: Is it okay to conceal key information from our customers to protect ENOC’s interest?

No, it is not an acceptable practice. Transparency is one of our core values embedded in our business relationships, we protect our customers’ right and keep them informed with key matters related to our products and services. Such actions violate ENOC Code of Business Conduct and should be reported.
Information Management

/ Records Management
/ Proprietary and Confidential Information
/ Use Of IT and Security
/ Public Statements
/ Social Media
/ Information Management in Practice
RECORDS MANAGEMENT

We expect our employees to maintain accurate and updated data and communicate the same to the relevant stakeholders.

It is essential that the internal and external reports and documents that we create, make public, or provide to our stakeholders. constitute full, fair, accurate, timely and understandable disclosures.

The information that our entities create, such as financial reports, accounting records, business plans, environmental reports etc. are required to be accurate, truthful, and properly maintained. The users of this information may be employees, government representatives, auditors and legal bodies.

Our employees must ensure the retention of records for requisite periods and that such records are subject to timely destruction when the specified retention period expires. “Record” for this purpose includes hard copies of documents, records on computers and electronic systems.

Employees who contribute to the creation/preparation of records are responsible for reading and understanding ENOC policies, directives and other procedures as they apply to their organisation.

Do you need more information?
Reference Documents: Statutory & Financial Record Retention Policy and Guidance Note (Refer to Group Legal Department for additional guidance)

PROPRIETARY AND CONFIDENTIAL INFORMATION

It’s advisable to mark confidential documents to avoid misuse of information.

ENOC’s proprietary and confidential information refers to information that is not officially available in the public domain. Information is a valuable corporate asset and its appropriate dissemination is critical to the organisation’s success. Safeguarding this information is the responsibility of all employees and representatives.

ENOC’s proprietary and confidential information is to be used solely in pursuits of the company’s business interests and must not be disclosed by any employee during or subsequent to termination of the employment relationship. Disclosure of confidential or proprietary information could seriously damage ENOC image.
Our employees should be careful not to share information with others, including other employees, unless they need to know it for a legitimate business reason that will not violate any law, regulation, or ENOC policies.

All requests for any information from an external body should be brought to the attention of the Line Manager and no information should be furnished until appropriate authorizations have been obtained.

Do you need more information?
(ENOC Privacy & Data Protection)

USE OF IT AND SECURITY

We take proactive measures to safeguard our documents, computers and other data devices that contain confidential information.

Our entities should use ENOC information resources for responsible and authorized business purposes. The information should be shared only on a “need to know basis”.

Our entities should follow “clean desk” policy and all confidential information should be kept in a secured environment. Entities should also be familiar with and follow pertinent ENOC IT policies.

IT users must keep all passwords confidential and are responsible to report any suspected security violations to their Line Manager, Group Information Technology Department or Business Ethics & Compliance Function.

E-mail systems are not entirely secure and may be susceptible to interception and caution should be exercised while sending or receiving mails to / from unknown sources.

Do you need more information?
Reference Documents: Terms of Use for ENOC IT Resources
PUBLIC STATEMENTS

All media enquiries should be channeled through Group Communications Department.

It is important that we provide the public with accurate and consistent information regarding our operations, when required.

Employees must not make public statements regarding issues or matters related to ENOC if they are not the authorized spokespersons.

All enquiries made by the media and/or similar parties should be channeled through the Group Communications Senior Manager or Public Relation Manager who will then discuss the appropriate response with the departments or individuals concerned.

The Public Relation team in collaboration with the respective department will prepare the media release, or statement, according to the established corporate rules and policies and liaise directly with the media organisations involved.

Do you need more information?
Reference Documents: Group Communications Policies

SOCIAL MEDIA

We encourage our employees to participate responsibly in social media to generate interest in ENOC without posing any risks to ENOC’s reputation or violate ENOC Code of Business Conduct.

We communicate in an accurate, honest and consistent way on our official social media networking sites. All requests from our entities and departments to publish certain content should be channeled through the designated Social Media Manager to maintain clear tone of communication to all our stakeholders. ENOC Group Communications Department will serve as advisors to all business units on various digital platforms.

We encourage our employees to use social media to promote ENOC’s reputation within the published policy & procedures framework. Our employees must be careful not to disclose confidential information or non-public information on social media or in any other public dissemination tools.

Do you need more information?
Reference Documents: Group Communications Policies
Information Management In Practice

**Q1:** One of the local newspapers approached me and requested general information about ENOC. Can I share it?

All media related enquiries should be directed to Group Communications Department.

**Q2:** I use my personal social media platform to talk about my daily activities. I posted about a major change in my organisation that was not announced yet. Is that fine?

We encourage our employees to promote ENOC positively in social media platform. ENOC employees are advised not to share confidential information. This is non-compliance to Group Communications Policies and ENOC Code of Business Conduct. You need to raise the matter to Group Communication Department for rectification.

**Q3:** Part of my job is to interact with customers and answer their inquiries, what should I do if the customer requested certain information and I am not sure if I should disclose it?

As per ENOC Privacy Policy, it is your responsibility to protect ENOC’s confidential information. You request guidance from your Line Manager and concerned departments.

**Q4:** I take some of my work to my home; can I store some confidential information on an external USB and work on it at my home using my personal laptop?

Our employees are responsible to maintain the confidentiality of ENOC information. In such cases, the employee should use a secured network and avoid taking such information to his/her home.

**Q5:** My manager is asking me to disclose confidential information related to my previous employer, what shall I do?

ENOC upholds the highest ethical standards. Our employees should act in a professional and ethical manner and not share such information.
/ Company Property
/ Personal Information & Data Privacy
/ Intellectual Property & Trademarks
/ Trust in Practice
COMPANY PROPERTY

Every employee has the responsibility to protect company’s property and to report if misused.

Our employees should protect company property to ensure its efficient use. Theft, carelessness, and waste have a direct impact on ENOC’s profitability.

All ENOC assets are to be used for legitimate company purposes. Any suspected incident of fraud or theft should be immediately reported through the provided means of communications such as the ENOC Ethics Hotline.

The obligation of employees to protect ENOC assets also includes the company’s proprietary information.

Do you need more information?

PERSONAL INFORMATION AND DATA PRIVACY

We are committed to protect our employees’ and customers’ personal information.

Personal information is information that can be used to uniquely identify, contact or locate us. We may use and disclose our employees personal information given to us or collected from third parties only as permitted or required under UAE law.

We shall not retain personal information for longer that it is needed, and will from time to time update such information to ensure that it is accurate and relevant to the purpose it was originally collected for.

Personal information received from customers is protected and used only in ways explicitly agreed with customers. Customers’ information is used in full compliance with our policies. As and when required, Non-Disclosure Agreements are signed between ENOC entities and our third parties and shall be vetted by Group Legal Department.

Do you need more information?
Reference Documents: Human Resources Policy Manual (ENOC Privacy & Data Protection) and IT Security Policy
INTELLECTUAL PROPERTY & TRADEMARKS

Intellectual property and trademarks include computer programs, researches, inventions, technical reports and articles that were developed during employees’ tenure at ENOC and have a commercial value.

Utilization of ENOC intellectual property (if not adequately protected) may affect ENOC’s competitive advantage and can result in severe consequences. Our entities should ensure that ENOC interests are protected from any intellectual property infringements. Steps should be taken to avoid infringement of non-ENOC patents.

The trademarks of ENOC and its various entities are valuable corporate assets which need to be used and managed properly. These assets are fragile and their protection requires collaboration and constant efforts to gain maximum value from the trademarks and not to impair the validity or worth of the trademarks.

Group Communications and Group Legal are the corporate departments responsible for acquiring the registration of Trademarks for ENOC Group of Companies’ products, goods and services. Our entities shall be responsible to inform both departments for their plans of new logos and other marks to be registered prior to any start of operations involving the use of such new trademark.

Anyone perceiving abuse or infringement against ENOC Trademarks should promptly approach both departments so that appropriate action may be taken.

Do you need more information?
Reference Documents: Group Communication Policies and Guidance Note (Refer to Group Legal Department for additional guidance)
Q1: I have a company credit card and I accidentally purchased something personal using the credit card. Can I return the item and get the money refunded without informing anyone?

Employees are responsible to use company’s property for intended business use. In your case, you need to inform the concerned parties (Line Manager/ Finance Department) to advise on proper rectifying action.

Q2: I received an email from my friend that includes confidential information related to trademark secrets of another company. What shall I do?

If you discover you have received such confidential information that you are not entitled to view and use, please escalate the matter to Group Legal or Business Ethics & Compliance team.

Q3: My friend is an IT expert and he was able to download software on my office laptop that helped to be more efficient in my work, is this acceptable?

This is not an acceptable practice. IT users should use only licensed and authorized software.
Compliance

/ Whistle Blowing
/ Anti-Fraud
/ Anti-Corruption Compliance
/ Antitrust and Competition Laws
/ Audits and Investigation
/ Compliance in Practice
WHISTLE BLOWING

Our employees have the right to report misconduct without fearing retaliation.

Whistleblowing is relevant to all organizations as every corporate entity faces the risk of things going wrong internally. Where such risk arises, usually the first people to realize or suspect the wrongdoing will be those who work in or with the organization.

We expect our employees to raise the matter even if it’s just a concern. The Whistleblowing Policy provides a procedure for reporting and addressing whistleblower complaints.

The objectives of the policy are to:

/ Encourage employees to raise their concerns about any unethical and/or illegal violations, business malpractices or misconduct in the organization at an early stage and in a proper way so that action can be taken immediately to resolve the problem.

/ Help solve issues within the organization fairly and reasonably.

/ Minimize the organization’s exposure to the damage that can occur when employees circumvent internal mechanisms and controls; and protect employees from retaliation for raising concerns.

Do you need more information?
Reference Documents: Anti-Fraud Policy, Business Ethics Committee Charter and Whistleblowing Policy

ANTI-FRAUD

Reporting fraud cases is the responsibility of all of us.

Our employees work hard to utilize and maintain the assets available to them. Assets include but not limited to money, equipment, technology and information.

These are all highly valuable and are to be safeguarded and used only to pursue ENOC’s business objectives. All assets must be protected against theft, loss or misuse. Protection of ENOC’s assets is the responsibility of each employee.

All incidents reported to Business Ethics & Compliance team regarding fraud, theft or other improper acts will be promptly investigated, and where appropriate, those responsible will be prosecuted.

Do you need more information?
Reference Documents: Anti-Fraud Policy; Business Ethics Committee Charter; and Whistleblowing Policy

ANTI-CORRUPTION COMPLIANCE

Bribery and corruption practices are prohibited and are strictly against ENOC Code of Business Conduct.

We prohibit our entities and our employees from bribing, providing facilitation payments or offering, promising, or authorizing anything of value directly or indirectly in order to obtain a business advantage. Our entities and employees can be held liable for such payments.
ANTITRUST AND COMPETITION LAWS

ENOC competes fairly and promotes healthy competition in the market place.

Our employees must not enter into any agreement that might “restrain trade” which includes dividing or manipulating the market, limiting production, or refusing to sell to certain clients or purchasing from certain suppliers or unlawfully restricting competition.

ENOC employees shall comply with all applicable competition laws in every jurisdiction where our operations are conducted. Compliance with all applicable antitrust and competition laws promotes healthy competition in the market place.

Should you have any doubt whether an agreement or an exchange of information, or any behavior whatsoever might raise issues under applicable anti-trust and competition laws, you may contact Group Legal Department for further advice.

AUDITS AND INVESTIGATION (EXTERNAL, INTERNAL & GOVERNMENT)

Our employees should cooperate with external, internal and government audits.

To be consistent with our internal controls and audit requirements, our auditors will conduct objective, independent examinations, taking into account high standards of business ethics, integrity and honest dealings required of organisation and its employees.

False or misleading statements to auditors, whether internal or external, are totally unacceptable since full cooperation with auditors is the responsibility of all employees. No member of management or any other employee may interfere with or hinder the audit process.

All our employees are required to fully cooperate with any appropriate government investigation, provided ENOC is adequately represented in such investigation by its own legal counsel.

Do you need more information?
Reference Documents: Business Ethics Committee Charter and Internal Audit Charter
Compliance
In Practice

Q1: I noticed my colleague is not following the procedures, just to save time and not to lose customers, what shall I do?

Inform your Line Manager in good faith or report it through ENOC Ethics Hotline reporting mechanisms.

Q2: My colleague is accepting bribes but I am afraid to report that. What should I do?

If you are not comfortable to escalate the matter internally, you need to report the matter right away through ENOC Ethics Hotline reporting mechanism. You should not fear relation when reporting misconducts in good faith. In case your colleague retaliated against you, you shall immediately inform Business Ethics & Compliance team.
To help ensure compliance with ENOC Code of Business Conduct (“the Code”), we require all our employees to acknowledge their understanding and adherence to the Code.

All employees are expected to read and understand the Code and the related policies and comply with the same.

If you observe or suspect any non-compliance with the Code, you are expected to inform your line manager or the Business Ethics & Compliance function immediately.
For any suggestions and feedback, contact the Business Ethics & Compliance function through the following reporting mechanisms:

**Ethics Hotline**

The Ethics Hotline facility is available for reporting offenses, complaints, unethical/illegal practices, any violation of the Code or professional standards etc.

*United Arab Emirates*
800 ENOC Ethic (800 3662 38442)

*Singapore*
1800 3662 222 (1800 ENOC CBC)

**ENOC Ethics Hotline Online Reporting Tool (Worldwide)**
www.enoc.ethicspoint.com

**Ethics Enquiry**

Employees who wish to seek clarity or have any ethics related questions may forward their enquiry at:

*Ethics Enquire Line*
Ethicsenquiry@enoc.com