

Management:

- Gulf steel Maintain. Support and respect all the internationally proclaimed human rights and local human right.
- Gulf Steel ensures acceptable wages, reasonable working hours, and safe working conditions for all employees in accordance with applicable labour laws and maintain international standards. Gulf steel promotes diversity in its workforce and includes local into workforce development.
- Gulf Steel ensures no use of child labour in any stage of its operations and promotes the same towards its supply chain along with stakeholders, which effectively eliminates child labour.
- Gulf Steel eliminates discrimination of all forms in employment and occupation, is committed to providing equal opportunities to all individuals, irrespective of race, ethnicity, gender, religion, disability, age, culture, socio-economic status or any other characteristic protected by applicable laws.
- All managers should create a cooperative work environment where all employees can engage, perform freely and have opportunities to engage with other colleagues meaningfully. Unlawful discrimination, violence, bullying, harassment, threats of violence and victimization in any form will be considered unacceptable and shall not be tolerated.
- Gulf Steel always works against corruption in all its forms which include extortion and bribery. Gulf steel shall act with disregard for any personal ulterior or improper motive, such as personal gain.
- Gulf Steel provides a safe and healthy work environment to all its employees, reduces the incidents and ensures support & compensation for work related injuries & illness according to UAE Labour law. Gulf steel is committed to eliminate all forms of forced and compulsory labor. Gulf Steel ensures the company is not complicit in human rights abuses.
- Gulf Steel committed to preventing, detecting, and reporting fraud, including fraudulent financial reporting, and maintain mitigation against risk of fraud.
- Gulf steel promotes engaging with local communities, understanding their needs, respecting their value, culture, beliefs and mitigating any adverse impacts if its operation may have on community.
- Gulf steel investment in the development of its employees and assured performance will be rewarded.
- Gulf steel is an equal opportunity employer, is committed to providing equal employment opportunities to all qualified individuals without regard to race, color, religion, sex, nationality, origin, age, disability, or any other characteristic protected by applicable laws.
- Gulf steel maintains the individual contract between everyone of gulf steel and initiates the process of renewal before contract is over, follow all the legal requirements, complete the visa sponsorship, provide insurance.
- Gulf steel visa sponsorship not only cover employment contract but also help employees providing access to government services by providing applicable documents for Driving license, Employees child school enrolment, opening bank account, traveling visa to other country, applying for loan from banks, applying for insurance and other practical needs of employees.
- Gulf steel treats (any offer, provide, request, or accept payments or anything of value from any person, including suppliers or Government representatives) as a bribe and must conduct discipline action against employee or stakeholder involved.
- Gulf steel assure, acknowledge receipt of stakeholder complaints / recommendation by respective representative.

Employees:

- All the employees shall adhere to Gulf Steel Industries Business code of conduct Policy and maintain the same throughout the organization. All employees shall work dedicatedly to maintain the product quality as top priority, protect environment pollution, Safe himself and others by following safety culture of gulf steel, Safe energy and promote sustainability.
- All employees shall follow and respect the contract between Gulf Steel and employees individually, follow relevant judicial, administrative requirements and all Gulf Steel rules, policies and

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procedures.

- All the employees shall work as professionals and respect others' values. Such as religion, culture, ethics. Unlawful discrimination, violence, bullying, harassment, threats of violence and victimization in any form will be considered unacceptable and investigate and prosecute.
- All employees shall perform his duties associated with their position carefully, impartially and conscientiously to the best of their ability, Follow the instruction of supervisors/managers and support appropriate assistance in a proactive and supportive ways to employees working under him.
- All employees should attend meetings on time, respect one another and conduct/participate in meetings in a structured and meaningful manner.
- All employees should avoid undertaking any activity that could potentially compromise the performance of their duties and be responsible for their performance. Individuals should follow all reasonable rules and instructions provided by Gulf Steel and supervise or manage their activities and/or work areas.
- All employees shall strive to obtain value for Company expenditure and avoid waste and extravagance in the use of the company.
- Married employees are responsible for spouse/family visa and ensure compliance with immigration requirements where applicable management will help with required documents.
- All employees bear in mind that never disclose confidential information about business, or employees' personal information, without proper approval.

Stakeholders:

- Gulf steel maintains professional working relationships with all stakeholders and adopts the teamwork culture between Gulf steel and its stakeholders.
- Gulf steel ensures that all stakeholders fully understand gulf steels requirements and shall maintain the product and service standards to assure gulf steels requirements.
- Gulf Steel assures ethical business with all its stakeholders and expects the same in returns.
- Stakeholder grievance will register and acknowledge, and action will be implemented as per gulf steel grievance mechanism.

Suppliers:

- Gulf steel maintains professional working relationships with all suppliers and adopts the teamwork culture between Gulf steel and its suppliers.
- Gulf steel shall ensure that all suppliers fully understand Gulf steels requirements and shall maintain the product and service standards to assure gulf steels requirements.
- Gulf Steel assures all its suppliers that Gulf Steel will never disclose confidential information about suppliers' business without suppliers' approval.
- All Supplier must fulfil the legal requirements of the country where their business established. Suppliers must follow labour and human rights, environmental law, ethical business practices as well as follow international agreements.
- All Suppliers of gulf steel must assure that no child employment in their premises, not encourage young workers do work that may deprives them of attending school. Gulf steel want to assure that all suppliers are having policy to comply with abolition of child labour and human trafficking.
- Force labour, slavery and human trafficking should not allow within supplier premises and assure the same for their supplier as well.
- All suppliers must assure themselves that they are committed to providing equal opportunities to all individuals, irrespective of race, ethnicity, gender, religion, disability, age, culture, nationality, colour and socio-economic status.
- All suppliers must implement grievances mechanism and all the employees in their organization

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have access of grievances mechanism. Physical, sexual, psychological, or verbal harassment or abusive behaviors must not be tolerated. Employees shall be encouraged to report business integrity issues, including potential issues related to bribery and corruption. Such systems shall include means for employees to raise compliance concerns in a confidential way and without fear of retaliation.

- All suppliers must ensure the working hours as per local law, overtime work based on mutual agreements, not holding of wages and pay on time, not retention of personal identity. Pay fair wages which at a minimum meet the applicable national wages.
- All suppliers may be allowed to exercise their rights to freedom association and group bargaining within the legal law of the country regarding freedom association.
- All suppliers must assure a safe and healthy workplace, hygienic accommodation, safe drinking water, acceptable sanitation, emergency exits in their industries/workplaces, provide PPES, presence safety equipment (Fire extinguisher/Fire hose/firefighting equipment's), presence of fire fighter, presence of First aiders and Provide training related to job, health & safety, Environment protection, energy saving and promote sustainability for their employees. Employees' physical health or mental well-being must be considered.
- All suppliers must assure that they shall never offer or commit any bribery, corruption, commission, or similar offences including any facilitation payments. Suppliers must strictly abide by all applicable anti-money laundering laws and establish required processes and controls in place in their organization. Any supplier finds out unethical / illegal practice by Gulf Steel or any employee of Gulf Steel can contract top managements of Gulf Steel through email: glfsteel@emirates.net.ae
- All suppliers must commit to preventing, detecting, and reporting fraud, including fraudulent financial reporting.
- Supplier shall never disclose any confidential information of Gulf Steel without approval from Gulf Steel authorities.
- Supplier shall implement process to use energy (electricity, natural gas, diesel) and water efficiently, reduce the use of natural resources as applicable, reduce greenhouse gas emissions, emissions to air must be within legal limits of the country. Supplier shall commit to reduce greenhouse gas emissions from its operation and transport impact. Supplier must agree that, on request of Gulf Steel supplier will provide details of their GHG emissions, Product Carbon Footprint, Lifecycle analyses & biodiversity impact assessments.
- Supplier shall assure that their operation does not affect the protected area, no harm to biodiversity and area of conservation.
- Suppliers shall implement a waste management hierarchy process that is eliminate, reuse, reduce, recycle and recover then disposal of waste respecting local laws.
- Suppliers must maintain a documented quality management system, including procedures, process, work instruction, equipment, and documentary evidence ensuring a consistent process output and expected quality level. (Raw material supplier must certified for ISO 9001 but other goods/service supplier may not certainly certify for ISO 9001).
- Supplier shall maintain documentation in such a way that can identify its finished product to its raw material sources, provide safety data sheet of product (included handling, storage and disposal).
- Suppliers ship materials which meet the Gulf Steel requirements and agreed in contract/ Purchase Order. Raw material Supplier must check each batch against Gulf Steel material specifications and must comply with the requirements before dispatch. Supplier must retain the record of Production, inspection, testing and dispatch for minimum of 1.5 year and agreed share the information on requires of Gulf Steel.
- Suppliers must develop and maintain business Continuity Plans which containing contingency plans in the event of significant supply chain disruptions, utility interruptions, labour shortages, and equipment failures will not affect supply of Gulf Steel requirements.
- Suppliers (Raw Material Supplier) must be able to identify 100 % of its supply chain and implement basic control to unidentified source for their supply chain.

Customer:

- Gulf steel maintains professional working relationships with all customers by providing the best product and service and adopting the teamwork culture between Gulf steel and its customers.
- Gulf steel understands all the requirements of suppliers and fulfills all requirements without failure.
- Gulf Steel assures ethical business with all its customers and expects the same in returns.
- Customers must clearly mention their requirements such as Product Standard, Product Size, Quality and packing details.
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Community Stakeholders:

- Gulf steel maintains professional working relationships with its community stakeholders and adopts the teamwork culture between Gulf steel and its community stakeholders.
- Gulf steel ensures that all stakeholders fully understand gulf steels requirements and shall maintain the product and service standards to assure gulf steels requirements.
- Gulf Steel assures ethical and responsible relationship with all its community stakeholders and expects the same in returns.
- Community stakeholder grievance will register and acknowledge, and action will be implemented as per gulf steel grievance mechanism.
- Gulf steel assure to maintain its operation such a way that any outcome from its operation will not impact the community stakeholder health, environment and activities.
- Guld steel assure its contribution towards its community stakeholder through volunteer work, charitable donation and support for local initiative.

Dated: 15th Jul 2024


Managing Director