

AL TAMIMI & COMPANY

CODE OF CONDUCT

Al Tamimi & Company (“the Firm”) is the largest corporate law Firm in the UAE and throughout the Middle East, providing an extensive range of legal services to a diverse range of clients.

The Firm is determined to use its knowledge, experience and intellectual rigour to find innovative solutions to overcome complex business challenges.

We are committed to complying with all applicable laws, rules and regulations as well as the Firm’s internal policies and standards.

Our Code of Conduct applies to everyone working at the Firm (including directors, partners, associates, support staff and temporary employees). We also hold our subcontractors, agents, suppliers, vendors and other third parties contracted by the Firm for the provision of goods and services from time to time (“Third Party Providers”) to high standards of integrity and it is expected that these principles are honoured by those with whom we do business.

1. ANTI-BRIBERY AND CORRUPTION

The Firm is committed to maintaining the highest ethical standards and vigorously enforces the integrity of its business practices wherever it operates. The Firm will not engage in bribery or corruption and its employees and any Third Party Providers are required to comply with all applicable anti-bribery and anti-corruption laws and governmental guidance. The Firm embeds a culture of best practice in anti-bribery and anti-corruption measures.

Whether in the interests of the individual, the Firm or a client of the Firm, the Firm and its employees are:

- Prohibited from offering, promising or paying a bribe of any kind;
- Prohibited from soliciting, accepting or receiving a bribe of any kind;
- Prohibited from giving or offering anything of value to a public official;
- Required to comply with the Firm’s guidelines and authorisation levels in relation to the giving and receipt of gifts, benefits and hospitality;
- Prohibited from making facilitation payments; and
- Required to complete due diligence into all actual and proposed Third Party Providers.

2. PERSONAL CONFLICTS OF INTEREST

The Firm’s employees must avoid situations or transactions in which their personal interests could conflict or might be seen to be in conflict with the interests of the Firm. This includes: acting on any client information gained through their employment with the Firm for personal gain; passing such information to a third party; or acting in any way that could be construed as insider trading.

Conflicts of interest can arise if individuals have a personal interest in business dealings involving the Firm. Personal interest can be direct or indirect, and refers not only to personal interests but to those of family members and friends. If there is a potential for conflict, the interests of the Firm must take priority.

Employees must disclose any personal conflict of interest or perceived conflict to the Managing Partner.

3. WHISTLEBLOWING

We recognise that Whistleblowing encourages and enables employees to raise serious concerns within Al Tamimi rather than overlooking a problem or 'blowing the whistle' once they have left the Firm.

The Firm is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of the Firm's work to come forward and voice those concerns.

We recognise that the decision to report a concern can be a difficult one to make. The Firm will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect anyone that raises a concern in good faith. All concerns will be treated in confidence and every effort will be made not to reveal the identity of the person, if requested.

We expect Third Party Providers to raise any concerns with the immediate business service manager procuring the Third Party Provider.

4. HUMAN RIGHTS /LABOUR

We respect human rights and are committed to conducting our business relationships with honesty, integrity and respect. The Firm is committed to support and respect the protection of human rights, and ensuring that we are not complicit in human rights abuses.

The Firm respects all employment rights and protection, including those aimed at eliminating slavery, forced, compulsory and child labour.

5. CONFIDENTIALITY

We comply with the rules of professional conduct which impose a duty on lawyers and their employees to preserve and protect confidential information about the Firm's clients. All information obtained in the course of representation of a client is regarded as confidential. Client consent is obtained before any information is disclosed to a third party, except information which is required to be disclosed by the legal process, under applicable law, rules or regulations, a governmental order or decree, a ruling or judgment of a court of competent jurisdiction.

6. PRIVACY AND PERSONAL INFORMATION

The Firm acts as a data controller of any personal information provided to us. We are committed to safeguarding the privacy of the personal information that is provided to us or collected by us during the course of our business as well as the personal information we receive.

We expect our Third Party Providers to comply with all Applicable Laws relating to data protection and privacy and will not (by any act or omission) put the Firm in breach of them. We also expect Third Party Providers to notify the Firm as soon as they become aware of any unauthorised access, theft, loss or damage, or any other breach of security, in relation to any personal data processed by them (or any of their agents, affiliates or subcontractors) on behalf of or disclosed to them by the Firm.

7. DIVERSITY AND INCLUSION

We value the diversity of the people and cultures within it. Diversity is an integral part of our business strategy and is critical to our success. We believe that promoting diversity means providing equality of opportunity and creating an inclusive work environment where everyone has the opportunity to succeed.

We expect our Third Party Providers to reflect the same and to show that they also value all aspects of inclusion and diversity.