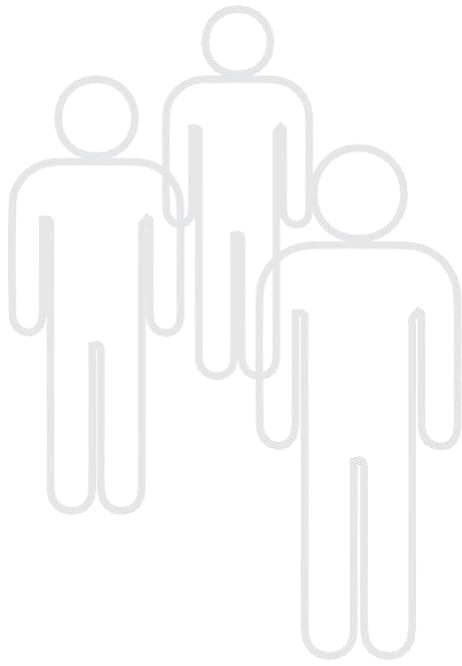




Supplier Code of Conduct



Introduction



Purpose and applicability

The purpose of this document is to detail the key principles of conduct and expectations Emirates Group has on all suppliers whom we do business with. This aligns with our internal code of conduct and should ensure that our standards of behaviour and expectations are extended throughout our supply chain.

While we appreciate that our Suppliers may have their own code of conduct, we request that the principles detailed in this document are considered and agreed as we build the relationship together to provide a high-quality service that is delivered with integrity and compliance to legal, sustainability and ethical requirements.

This code of conduct is applicable to all suppliers' goods and services to Emirates Group and will be stipulated as part of our standard sourcing process

Legal Compliance

Suppliers are responsible for ensuring that they are in compliance with all applicable laws and regulations in each country where they conduct business and for understanding and complying with this Code of Conduct as well as other Emirates Group policies. If Emirates Group policies are in direct conflict with applicable local laws, then the local law shall prevail.

Likewise, the rights of a Supplier and Emirate's rights as a customer are governed by the terms and conditions stipulated in their contractual agreement and this Code of Conduct is not intended to modify said terms and conditions.



Labour & Human Rights



Anti-Discrimination

Suppliers shall not discriminate, and shall promote equal opportunity, in hiring and employment practices, including wages, on the grounds of criteria such as of ethnic origin, colour, religion, gender, age, physical ability, national origin, sexual orientation, political affiliation, medical condition or marital status.

Anti-Harassment and Abuse

Every employee shall be treated with respect and dignity. Mental or physical coercion or punishment, or threat of physical abuse or punishment, any kind of sexual or other harassment and other forms of intimidation are prohibited.



Involuntary Labour and Human Trafficking

Suppliers shall not under any circumstance use or benefit from, any form of forced or compulsory labour or any other form of involuntary labour or service which is extracted from any person under coercion, harassment, the menace of any penalty such as the use of physical punishment, confinement, or threats of violence as a method of discipline or control. Emirates Group expects that our suppliers will in turn hold their own suppliers to these same standards and principles.

Prevention of Underage Labour

The use of child labour by the Supplier is strictly prohibited. In alignment with the Minimum Age Convention, 1973 (No.138), set by International Labour Standards, the general minimum age for admission to employment or work is 15 years (13 for light work) and the minimum age for hazardous work is 18 (16 under certain strict conditions). It provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed.



LABOUR & HUMAN RIGHTS

Business ethics issues



Anti-corruption, extortions and bribery

Suppliers are prohibited from: (a) making or receiving bribes in connection with Group business; and (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.

Suppliers must never offer, pay, request or accept anything of value to obtain an improper advantage, or improperly influence any kind of decision or action, whether directly or through a third party.

Suppliers are not expected to offer any gifts, hospitality or entertainment to any employee or representative Emirates Group. Offers that are reasonable and proportionate to the relationship may be accepted in the interest of better representation of services and products, or improved relationships, but never with the intent to influence business decisions or behaviour. Emirates neither seeks to improperly influence the decisions of Suppliers through offering any gifts, hospitality or entertainment nor accepts such offers.



Antitrust and competition

Suppliers are expected to conduct their business in an open and honest manner and must carry out their business for Emirates Group in compliance with competition laws. Both Emirates Group and their Suppliers will prohibit business behaviour which has the objective or the effect of preventing, restricting or distorting competition (e.g. price fixing and the allocation of markets or customers).

Conflict of interest

Suppliers must avoid situations where personal interests, such as family or financial interests, conflict with those of Emirates Group (or may be perceived as such). Any actual, potential or perceived conflict of interest must be reported to Emirates Group to ensure it is managed appropriately.



ETHICS



Health, Safety & Sustainable procurement



Health and Safety

Suppliers must provide employees with a safe and healthy workplace to prevent accidents and injury to health. To that effect Suppliers shall take a proactive approach to health and safety by implementing policies, systems and training designed to prevent accidents, injuries and protect workers' health. Suppliers shall identify and be prepared for emergency situations. They shall regularly train employees on emergency planning, responsiveness as well as medical care.



Sustainable procurement

Suppliers should recognize the relevant adverse effects on the community, environment and natural resources and that such effects must be minimised to safeguard the health and safety of the public. To achieve this objective, Suppliers shall observe and comply with all applicable environmental Laws, including, without limitation, those which relate to

- (i) obtaining and maintaining required environmental permits, approvals and registrations, as well as complying with applicable operational and reporting requirements;
- (ii) the handling, removal, transportation and disposal of hazardous materials used by Supplier; and
- (iii) monitoring, controlling, treating and sanitizing air emissions, waste water and solid wastes. Supplier will seek opportunities that promote the efficient use of resources and energy, as well as clean and low energy solutions.



HEALTH, SAFETY & SUSTAINABILITY

Data Protection and Confidential Information

Suppliers must take adequate measures to ensure sufficient protection of data received from Emirates Group and to ensure the rights of privacy of its employees and their personal data. The Supplier is expected to treat these data in accordance with the EU General Data Protection Regulation (GDPR) as well as any applicable national legislation relevant to the protection of data and privacy.



Risk management

Suppliers shall set in place appropriate measures to identify the risks associated with their operations, specifically to align with the principles specified in this Code of Conduct, and shall implement appropriate controls to mitigate the identified risks

Monitoring and enforcement

Suppliers shall periodically conduct objective and independent audits, taking into account the highest level of business ethics, integrity and honesty. A strong audit effort helps assure compliance with established policies, procedures and controls as well as assists in identifying potential deficiencies. Accordingly, Suppliers shall ensure prevention and timely correction of non-compliance and the implementation of improvements as appropriate.

Emirates Group reserves the right to request to audit and inspect Supplier's operations and facilities. If the results of such an audit or inspection cause Emirates Group to be of the opinion that the supplier does not comply with this Supplier Code of Conduct, the Supplier shall take necessary corrective actions in a timely manner.

Whistle-blower Protection and Anonymous Complaints

As a global organisation, we are committed to ethical business practices. We believe long-term, successful business relationships with customers, suppliers and partners are built on honesty, fairness and the strength of our products and services. The company encourages anyone with legitimate concerns about practices within the tender process to come forward and voice those concerns confidentially. You can raise your concerns by email to:

procurementconcerns@emirates.com