THE EMIRATES GROUP

Supplier
Code of Conduct





Introduction

Emirates Group is committed to maintaining the highest standards of business integrity, ensuring that all practices align with applicable laws and ethical principles. We prioritise responsibility, sustainability and ethical conduct in everything we do.

In line with the United Nations Global Compact, Emirates Group upholds core values in human rights, fair labour practices and environmental responsibility. We have a zero-tolerance policy toward corruption, modern slavery and child labour, regardless of the sector or location.

As a valued supplier, your role is essential in continuing to advance our efforts to improve and refine our supply chain. The Emirates Group Supplier Code of Conduct sets forth the key requirements for suppliers and third parties.

We expect you to comply with legal obligations and lead the way in promoting social, environmental and business ethics throughout your own supply chain.

This code of conduct is applicable to all suppliers' goods and services to Emirates Group and acceptance of this code of conduct is required as part of our standard agreement with all vendors.

Labour & Human Rights

Commitment to Human Rights and Fair Employment Practices

Suppliers must operate with integrity, respecting human rights and adhering to internationally recognised labour standards, such as those set by the International Labour Organization (ILO) and the United Nations Universal Declaration of Human Rights.

This includes providing fair wages, ensuring safe working conditions, and strictly prohibiting harassment, discrimination and all forms of forced, bonded, or child labour.

Suppliers are responsible for identifying human rights risks in their operations and supply chains, and taking immediate action to prevent or mitigate any adverse impacts, in alignment with international human rights frameworks.

Anti-Discrimination

Suppliers must ensure a workplace free from discrimination and actively promote equal opportunity in all practices, including hiring, employment, and wage decisions. Discrimination based on ethnic origin, colour, religion, gender, age, disability, national origin, political affiliation, medical condition, marital status, or any other protected characteristic is strictly prohibited.

Labour & Human Rights

Anti-Harassment and Abuse

All workers engaged by the Supplier, or within the Supplier's supply chain, must be treated with respect and dignity. Any form of mental or physical coercion, punishment, threats of abuse, sexual harassment, intimidation, or any other form of mistreatment is strictly prohibited.

Prohibition of Forced and Compulsory 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.

Suppliers are required to provide employees with clear terms, in a language they understand, outlining their rights and responsibilities regarding wages, working hours, benefits, and employment conditions.

Suppliers must never retain employee identification (passports, work permits) or deny access to such documents unless required by law. Charging employees any form of fees, recruitment costs, or deposits as a condition of employment is strictly prohibited.

Suppliers must respect the right of workers to terminate their employment with reasonable notice and ensure all owed wages are paid promptly. Workers must also have the freedom to leave the workplace after their shift without obstruction.

Prevention of Underage Labour

The Supplier must not use child labour or permit the use of child labour within its supply chain. 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. The Supplier is expected to comply with both the International Labour Standards, and applicable laws and regulations in all locations where the Supplier conducts its business (whichever has a higher minimum age for employment).

Fair Wages and Benefits

Suppliers must meet or exceed local minimum wage laws and ensure overtime is compensated fairly. They must provide clear contracts outlining employee rights, in alignment with international standards. No fees or charges should be imposed on workers as a condition of employment.

Human Rights Due Diligence

Suppliers are expected to conduct human rights due diligence in their operations and supply chains, in accordance with the United Nations Guiding Principles on Business and Human Rights and other applicable laws. This process should involve identifying, preventing, mitigating, and accounting for how businesses address their actual and potential adverse human rights impacts.

Diversity and Inclusion

Suppliers are encouraged to promote diversity and inclusion in their hiring practices, particularly among underrepresented groups.

Integrity and Business Ethics

Compliance with Laws

Suppliers must fully adhere to all applicable laws,regulations and ethical standards, not only in their principle location but also in every country where they operate or provide services, ensuring compliance across all jurisdictions.

Anti-Bribery and Corruption

Suppliers must fully comply with all applicable anti-corruption laws and regulations in their business dealings with Emirates Group. Suppliers are expected to implement a robust compliance programme, tailored to their specific risks, and conduct due diligence to prevent and detect corruption in all business activities, including contracts, partnerships, joint ventures, and dealings with third parties such as agents or consultants.

Suppliers are strictly prohibited from offering or accepting bribes or any financial or other advantages intended to influence or reward improper actions. They must not offer, pay, request, or accept anything of value to gain an improper advantage or improperly influence decisions or actions, directly or through third parties.

Suppliers are discouraged from offering gifts, hospitality, or entertainment to Emirates Group employees or representatives. Any offers must be reasonable, proportionate, and for legitimate business purposes, never with the intent to influence decisions. Similarly, Emirates Group does not seek to influence suppliers through gifts, hospitality, or entertainment, nor will it accept such offers.

Antitrust and Competition

Suppliers must uphold the highest standards of competition and integrity. Any from of behavior that has the object or effect of preventing, restricting or distorting competition (such as price-fixing, bid rigging, market allocation, collusion or dominance) is strictly prohibited. Suppliers must never engage in the exchange of sensitive competitive information whether current, past, or future that could distort or undermine fair competition.

Ethical Reporting and Whistleblower Protection

To foster a culture of transparency and accountability, we require all our suppliers to establish and maintain robust, confidential reporting mechanisms that enable employees and stakeholders to report potential misconduct without fear of reprisal.

Suppliers must establish and maintain secure, anonymous communication channels that enable their employees and subcontractors to report any suspected illegal or unethical activities without fear of retribution. These channels should be easily accessible, well-publicised within the organisation, and designed to ensure confidentiality and anonymity.

Suppliers are required to implement robust policies and procedures that protect whistleblowers from any form of retaliation, including but not limited to, discrimination, harassment, or adverse employment actions. This commitment extends to both internal and external whistleblowers who report concerns through the established channels.

Suppliers must maintain a transparent process for investigating reported concerns, with clear protocols that protect the identity of the reporting individual and ensure a fair, impartial review of the allegations.

Suppliers must commit to taking appropriate corrective action in response to substantiated reports of misconduct.

Conflict of Interest

Suppliers must proactively avoid any situations where their personal, financial, or family interests conflict with those of Emirates Group or where such a conflict could be perceived. Any actual, potential, or perceived conflicts of interest must be promptly reported to Emirates Group to ensure they are managed appropriately and transparently.

Adherence to Trade Restrictions and Sanctions

Suppliers must comply with all applicable trade bans, sanctions, restrictions, export controls laws, and boycotts in every jurisdiction where they and their supply chains operate. It is imperative that all legal obligations are met to prevent any violations of international trade regulations.

Health, Safety & Sustainable Procurement

Health and Safety

Suppliers must provide workers 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 and injuries, and that protects workers' health and safety. Suppliers shall identify and be adequately prepared for emergency situations. They shall regularly train employees on emergency planning, responsiveness as well as medical care.

Environmental Sustainability

The Emirates Group is committed to environmental stewardship and minimising the environmental impact of our operations across all our businesses and activities. This includes ensuring the suppliers we work with, and their supply chains, are aligned with our sustainability values. We expect our suppliers to demonstrate their commitment by adhering to the Emirates Group Supplier Code of Conduct.

Suppliers shall maintain an effective Sustainability or Environmental Policy that considers efficient resource use, preservation of biodiversity, zero tolerance of illegal wildlife trafficking, environmental impact mitigation, and training and awareness of employees on related topics.

Suppliers shall ensure compliance with all applicable local and international environmental legislation.

Suppliers shall implement an environmental management system in accordance with globally recognised standards such as ISO 14001 or equivalent, which includes a robust process for monitoring their environmental performance.

Suppliers shall implement an ethical and responsible sourcing strategy and carry out effective due diligence on their supply chains. Where required, suppliers must obtain applicable sustainability-related labels and certifications for relevant products and materials.

Suppliers shall implement control measures to prevent ground and water contamination, as well as air and noise pollution.

Suppliers shall adopt an effective waste minimisation strategy, including reduction of packaging waste, as well as ensure proper handling and disposal of hazardous materials in accordance with applicable regulations.

Emirates Group Sustainable Procurement policy is publicly available on www.theemiratesgroup.com under Procurement section.

Compliance Issues

Data Privacy

Emirates Group takes data privacy seriously. Suppliers and their contractors are required to comply with all applicable data privacy laws. They must have policies, processes, procedures and measures in place to ensure appropriate processing of all Emirates Group customer and employee personal data in accordance with applicable data privacy laws and industry standards and ensure the confidentiality, integrity, and availability of all such data.

Where applicable, suppliers and their contractors must enter into a data processing agreement to govern the processing of personal data and ensure that all data processing activities are conducted in full compliance with the agreed terms and legal requirements.

Risk Management

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

Compliance Issues

Information Security

Suppliers and their contractors are required to maintain a high standard of information security to protect all data, including personal and proprietary information, from unauthorised access, loss, or misuse. This includes complying with applicable data protection laws, ensuring access to sensitive information is restricted to authorised personnel, and promptly notifying us of any security incidents.

Suppliers and their contractors should implement appropriate security controls, based on recognised standards, to mitigate risks, and ensure data is securely retained and disposed of when no longer needed.

Suppliers must preserve access logs for a minimum of 12 months and provide them for audits as required. Continuous improvement of security practices is expected, with an emphasis on ongoing risk management, employee awareness, and compliance with contractual obligations.

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 independent audit process 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.

Whistleblower Protection and Anonymous Complaints

As a global organisation, we are committed to ethical business practices. We believe that lasting, successful partnerships with customers, suppliers, and stakeholders are founded on honesty, fairness, and the excellence of our products and services. We encourage anyone with legitimate concerns about potential or actual non-compliance with any aspect of this Supplier Code of Conduct to come forward and share those concerns confidentially.

Concerns can be raised via email at: procurementconcerns@emirates.com

Consequences for Violating the Code

Failure to meet the expectations outlined in this Code will result in a review of the business relationship, with corrective actions taken as necessary, in accordance with the terms of the relevant procurement contracts. Non-compliance may lead to the termination of the business relationship.

