



Global Responsible Sourcing Policy

Burjeel Holdings Plc

1. PURPOSE

The Global Responsible Sourcing Policy (the “Policy”) outlines Burjeel Holdings PLC’s (“Burjeel”) commitment to responsible sourcing practices and sets out the behaviour and standards that we expect all our suppliers to uphold. By Suppliers we mean any individual or entity that provides goods or services to, or performs work for or on behalf of, **Burjeel Holdings PLC or its subsidiaries**, including their subcontractors, representatives, and agents.

We expect that all suppliers, directly or through their supply chain, conduct in accordance with the principles and standards in this Policy and implement suitable management systems and processes.

We encourage all our suppliers to exceed these minimum standards. A supplier’s ability to meet and exceed the standards set out in this Policy will be considered when Burjeel makes procurement decisions. We expect all our suppliers to communicate this Policy to their related entities, employees, agents, suppliers, and subcontractors so that they are aware of, understand, and comply with this Policy. Burjeel also expects all its suppliers to examine not only their own operations, but their supply chains, to identify and appropriately address risk areas where they do not comply with these standards.

Burjeel subsidiaries may supplement this Policy with policies that have specific relevance to their operations and market location. Where Burjeel is a party to a joint venture but does not exercise effective control, Burjeel will look to assist the joint venture entity to promote high standards across its supply chains.

2. OUR VALUES

We are guided by our mission of **‘treating every human life in our hands with utmost care’** which underpins our ambition to be the most trusted and respected healthcare provider of the future. That ambition is supported by our sustainability strategy, which has four core pillars:

- Healthy Governance
- Healthy Governance
- Healthy System
- Healthy Community

Burjeel’s interconnection with people, the planet, and the community is also reflected in our organisational values. These values promote strong relationships with our partners, constant improvement, and sustainable growth, and inform our approach to responsible and ethical business practice. Burjeel respects and values its suppliers as partners and cares about the way it treats and does business with them. We expect all our suppliers to share our commitment to responsible sourcing practices and value a collaborative approach to achieving our sustainability objectives.

3. HUMAN RIGHTS AND LABOUR RIGHTS

Burjeel strives to support and respect the protection of human rights and to improve the communities in which we operate. Our approach has been developed to align with the principles adopted in the UAE Vision 2021, Abu Dhabi Vision 2030, and our commitment to the United Nations Sustainable Development Goals.

Burjeel encourages its suppliers to facilitate training and education for their personnel to promote awareness of, and compliance with, all applicable modern slavery laws and regulations. Suppliers should maintain accurate records for the training provided to personnel.

Burjeel requires our suppliers to:

3.1. Human Rights and Modern Slavery

- a) Conduct their business in a manner that is aligned with the applicable law, rules, and regulations of the countries in which it conducts business and operations.
- b) Manage operations and supply chain in a manner that is consistent with the UAE and Abu Dhabi applicable laws, rules, and regulations of the countries in which it conducts business and operations
- c) Comply with applicable laws, regulations and conventions in relation to criminal conduct, forced, bonded labour, child labour, slavery (including modern slavery), servitude, forced marriage, debt bondage and human trafficking and in relation to modern slavery risk reporting requirements.
- d) Not engage in or tolerate the use of forced, bonded, compulsory labour, slavery, servitude, forced marriage, debt bondage or human trafficking, the use or threat of physical or other punishment, the use of deceptive recruiting, or the physical, sexual or psychological abuse, inhumane treatment or other forms of intimidation of workers.
- e) Review and audit their operations and supply chain to identify any breaches of, or risk of non-compliance with, modern slavery laws and regulations.
- f) Comply with international and local obligations relating to the employment of children, including adhering to the minimum legal working age in their jurisdiction or with the standards set by the International Labour Organization, whichever is higher.
- g) Ensure children under the age of 18 are not employed in hazardous work or in work incompatible with their development

3.2 Labour practices

- a) Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, leave entitlements and other benefits, and ensure the timely payment.
- b) Provide workers with clear and understandable information about all relevant employment conditions before they enter employment.
- c) Ensure working hours do not exceed the maximum hours per week required by applicable laws.
- d) Avoid subcontracting with individuals or entities reasonably known to disregard or be in breach of applicable labour laws and regulations.
- e) Ensure that only workers with a legal right to work shall be employed or engaged.

3.3 Freedom of association

Respect workers' rights, in accordance with applicable laws, to freedom of association, to collective bargaining, to establish and join or not join workers' associations, and to engage in lawful industrial activity, without interference, intimidation, or harassment.

3.4 Anti-discrimination & harassment

- a) Not engage in or tolerate direct and indirect discrimination based on gender, age, race, ethnicity, nationality, immigrant status, religion, marital status, sexual orientation, gender identity, pregnancy, disability, union membership or political affiliation, or any other status protected by applicable laws.
- b) Provide and support a workplace which is free from bullying, harassment, victimisation and abuse, whether physical, sexual, verbal or psychological.
- c) Promote the principles of diversity, inclusion and respect in the workplace and through their supply chains.

3.5 Accessibility

Ensure the workplace is accessible for all persons, including by making reasonable adjustments in line with relevant discrimination laws, standards, and regulations.

3.6 Indigenous rights

- a) Respect, protect, and promote the rights and autonomy of Indigenous peoples.
- b) Uphold the right of Indigenous peoples impacted by their operations or supply chain to free, prior, and informed consent

3.7 Work health and safety

- a) Comply with applicable workplace and product health and safety laws and respect workers' rights to refuse to perform work that is unsafe.
- b) Provide a safe and hygienic environment for workers and third parties, by identifying and managing risks, providing safe and appropriate equipment, training, and resources, and ensuring access to facilities and amenities.
- c) Encourage workers to report safety concerns about their workplace, investigate those concerns and undertake remedial action if necessary.
- d) Identify, evaluate, and control any exposure to chemical, biological, and other harmful agents.
- e) Ensure that where accommodation is provided to workers it is clean, safe, and meets the basic needs of the workers it is provided to.

4. TRANSPARENCY AND GOVERNANCE

Burjeel conducts its business with integrity and is committed to ensuring high standards of governance and business ethics throughout its supply chain.

Burjeel requires our suppliers to:

4.1 Ethical business practices

- a) Comply with all applicable legal and regulatory requirements of the jurisdictions in which the supplier operates, including valid directions from government or government authorities. The standards outlined in this Policy do not replace or alter any legal or regulatory obligations of suppliers.
- b) Obtain, maintain and comply with all required permits, licences and registrations.
- c) Act and conduct their business in a fair, honest, ethical, transparent and professional manner.
- d) Ensure that no conflict of interest arises between any personal or business interests and their obligations and duties relating to their business relationship with Burjeel.
- e) Not engage in corruption of any kind, including fraud, bribery, secret commissions, kickbacks, illicit payments, facilitation payments or any other form of corrupt conduct, and comply with all applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations.
- f) Not make a payment to any third party, including any of their agents, suppliers, and subcontractors, if they know or suspect that person may use or offer all or part of the payment as a bribe.
- g) Ensure that the giving or accepting of any gifts, entertainment, or hospitality is done in an open and transparent way and in compliance with Burjeel's policies and protocols, including the Burjeel Code of Conduct and Anti-Bribery and Corruption Policy.
- h) Not engage in or tolerate association with any criminal organizations or illegal activity.
- i) Comply with international and applicable local laws and regulations relating to sanctions, export or import, and trade controls.

- j) Not engage with persons, countries, or organizations sanctioned by the UAE Security Council. or take supply of goods or materials that originate from such sanctioned countries, or which were sourced or made using forced, bonded, compulsory labour, child labour, slavery (including modern slavery), servitude, forced marriage, debt bondage, or human trafficking.
- k) Develop, maintain, and implement policies consistent with this Policy, and maintain adequate records and systems to ensure compliance with this Policy.
- l) Ensure accurate and complete books and records are kept, including all financial transactions. m) Comply with all applicable policies and procedures of Burjeel.

4.2 Data protection and cyber security

- a) Not disclose or release any of Burjeel’s confidential or proprietary information to any third party, without the prior written consent of Burjeel.
- b) Not publicly disclose their supply association with the Burjeel or use the Burjeel’s name or brand elements without the prior written consent of Burjeel.
- c) Have systems for identifying and protecting against cyber security risks and taking reasonable actions to control and mitigate such risks.
- d) Proactively manage data protection and personal data to minimise the risk of that information being compromised or misappropriated.

4.3 Quality

- a) Ensure all products & services are compliant with applicable laws and standards.
- b) Ensure globally recognized and accepted safety & quality certifications, and approvals are obtained and maintained by suppliers.
- c) Maintain quality control systems that are compliant with applicable laws and standards.
- d) Maintain and retain all required records which demonstrate compliance with applicable quality standards and regulations.
- e) Develop and maintain processes for voluntary and compulsory product recalls that comply with all applicable laws and regulations.
- f) Notify Burjeel immediately in writing if any product is directly or indirectly the subject of regulatory action, a product recall, or where there is an event relating to the supplier or the product that could create adverse publicity for Burjeel.
- g) Have, maintain, and retain (for the required periods) all appropriate records demonstrating the supplier’s adherence to all relevant quality standards.
- g) Have and maintain all appropriate insurances with a reputable insurer to cover the supplier’s business operations and risks and hold this insurance (including any run-off cover) for appropriate periods in accordance with the supplier’s purchasing or supply agreement with Burjeel.

5. SUPPLIER DIVERSIFICATION

Our sourcing policy is designed to mitigate the risk of product and service unavailability. Contingency planning has been built into our sourcing strategy to establishing sourcing alternatives. This ensures uninterrupted supply chains in case of unexpected disruptions. Supplier diversification and building strong relationships with multiple vendors, enhance our resilience and capability to meet our commitments without compromising on quality or efficiency.

6. SUSTAINABILITY

Burjeel is committed to caring for our planet and operating sustainably. Burjeel seeks to build relationships with suppliers who are committed to environmental and resource sustainability.

7. BURJEEL'S COMMITMENT

Burjeel has proposed its measurable targets and initiatives aligned with the ESG framework of maintaining a healthy system, healthy community, healthy governance, and healthy environment. Burjeel aims to achieve carbon neutrality by 2040 to help limit global warming to 1.5°C.

Burjeel strongly encourages suppliers to:

- a) Measure their greenhouse gas emissions and establish a baseline.
- b) Adopt science-based emissions targets using Science Based Target Initiative (SBTi) guidance and tools and submit them to the SBTi for validation.

7.1 Environment

- a) Comply with applicable environmental laws, regulations, and standards and obtain, maintain, and comply with necessary permits or approvals.
- b) Implement systems to manage, store and responsibly dispose of hazardous waste materials.
- c) Consider product packaging and ways to minimise the use of single-use plastic packing material
- d) Seek opportunities to increase their reliance on renewable energy sources or zero-carbon electricity.
- e) Minimise greenhouse gas emissions
- f) Actively manage the environmental impact of operations across all areas, including by maximising the efficient use of energy, water, and resources, minimising waste and pollution, and implementing policies and procedures in relation to ethical and compliant materials sourcing and biodiversity.

7.2 Treatment of animals

Maintain and implement policies and guidelines that ensure the ethical and humane treatment of animals, and whenever possible, promote the use of non-animal alternatives.

7.3 Conflict minerals

Where suppliers source the minerals of tin, tungsten, tantalum, and gold (3TG) for the manufacture of electronic medical devices, implement policies and systems to ensure to assure that products and components supplied are deemed free of 3TG originating from conflict mineral sources.

8. SUPPLIER DIVERSITY

Burjeel will seek to create diverse supplier relationships and collaborate and partner to influence and support positive change in our global supply chain. Aligned to procurement requirements and criteria, Burjeel will take a proactive approach to create diverse supplier relationships that are mutually beneficial and foster stronger communities. The aim for supplier diversity in our procurement and sourcing strategy to provide equal opportunities to suppliers that are indigenous-owned, social enterprises, disability enterprises, women-owned (among others).

9. MONITORING AND COMPLIANCE

Burjeel monitors and promotes compliance with this Policy through the Burjeel Responsible Sourcing Program. To identify and manage procurement risks, we may require our suppliers to complete a corporate social responsibility assessment conducted by an independent third party.

We reserve the right to review compliance with this Policy and require our suppliers to cooperate and provide any information as we may reasonably require performing such a review. If a supplier is unwilling or unable to comply with the policy, we reserve our right under the relevant supplier agreement to either suspend or terminate the agreement.



Suppliers are expected to implement their own systems, processes, and policies to ensure compliance with this Policy as a condition of doing business with Burjeel. A supplier must immediately notify Burjeel if they become aware of any breach of this Policy, any allegations of non-compliance or investigations into non-compliance by authorities. The process to follow is set out in section 8 below. Suppliers must take all reasonable steps to address, remedy, and prevent any further breaches. We may, from time to time, review and update the Policy.

We encourage suppliers to visit Burel’s website from time to time for any changes to this policy. To provide feedback regarding this Policy or Burjeel’ s Responsible Sourcing Program, contact the compliance team at cs@burjeelholdings.com.

10. RAISING A CONCERN

We encourage suppliers to report concerns in relation to any actual or suspected breach of this Policy by directly contacting to the Burjeel Responsible compliance team at cs@burjeelholdings.com.

11. GOVERNANCE

This Policy is overseen by the Board. Any material breaches of this Policy must be reported to the Burjeel Responsible Sourcing Team and report to the Compliance Officer.

12. DOCUMENTATION AND REGULAR REVIEW

We will regularly review and update this policy to reflect changes in our operations, supply chain, and regulatory requirements. You can direct any suggestions for improvements to this Policy to Burjeel’ s Compliance Officer at cs@burjeelholdings.com.

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