



Global Supplier Code of Conduct

Burjeel Holdings Plc



1. Purpose

The Global Supplier Code of Conduct (the “Policy”) outlines Burjeel Holdings PLC’s (“Burjeel”) commitment to sustainability practices. It sets out the behaviour and standards that we expect all our suppliers to uphold. By Suppliers we mean any individual or entity (including their subcontractors, representatives, and agents) that provides goods or services to, or performs work for or on behalf of, Burjeel Holdings PLC or its subsidiaries. We expect that all our suppliers, whether directly or through their supply chain, conduct themselves 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 party to a joint venture but does not exercise effective control, Burjeel will look to assist the joint venture entity to promote these 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 a 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 Environment
- Healthy System
- Healthy Community

Burjeel’s interconnection with people, planet and 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. Compliance with laws and regulations

Suppliers must comply with all applicable local, state, federal, and national laws, and regulations of the jurisdictions in which they are doing business, as well as other relevant legislation applicable to their business arrangement with Burjeel. Without limiting the foregoing, Suppliers must also comply with all applicable laws and regulations relating to the Supplier’s operations, and similar or equivalent requirements in other countries.

Should legal requirements and internationally accepted standards, such as conventions of the International Labour Organization (ILO) or the Universal Declaration of Human Rights, conflict, Suppliers must, at a minimum, be compliant with the legal requirements of the jurisdictions in which



they are operating. If internationally accepted human rights, labor and/or other standards exceed legal requirements, the Supplier is expected to work towards achieving those higher standards.

4. Supply Chain Sustainability

Burjeel is committed to fostering social and economic development and contributing to the sustainability of the countries and communities in which we operate. We encourage Suppliers to adopt this same commitment in their business operations and third-party engagements. This includes but is not limited to, providing supply chain transparency, mapping their supply chains, and evaluating their supplier's performance and risk in related areas.

5. Suppliers Diversity

Suppliers are expected to partner with a diverse pool of suppliers and other Suppliers through inclusive sourcing procedures that promote equal opportunities.

6. Selection and Onboarding

To ensure that Burjeel works with the right third parties and to protect Burjeel's brand and reputation, we conduct a thorough registration/selection, due diligence, and engagement process prior to onboarding or engaging any Supplier.

The Supplier is encouraged to ensure that its own providers and subcontractors are made aware of the principles of this Code when undertaking any work, or providing any product or service to, or on behalf of Burjeel and shall take reasonable steps to ensure that its selection processes also include adequate due diligence on subcontractors.

The Supplier shall ensure it does not commence any work or activities on behalf of Burjeel until it confirms it has read, understood, and will comply with all the principles set out in this Code.

7. Supplier Monitoring

The Supplier must ensure they have processes in place to identify, correct and monitor the continued compliance of any activities that fall below the standards of ethical conduct set out in this Code. Any breach of this Code may be considered a material breach of any agreement or contract with Burjel, and Burjeel reserves its legal rights and remedies in respect of any such breach.

8. Anti Bribery and Anti-Corruption

Anti-Corruption

Suppliers must comply with the anti-corruption laws of the countries in which they do business, and to the extent applicable in their business dealings with Burjeel any other anti-corruption laws, including without limitation the UAE Anti corruption and the UAE Bribery laws, with the more restrictive requirements prevailing. In addition to the foregoing, Suppliers must abide by the Burjeel Anti-Bribery and Anti-Corruption policy available on the internet at www.burjeelholdings.com.



Anti Bribery

Suppliers may not make any direct or indirect payments or promises of payment to foreign government officials for the purpose of inducing that individual to use his/her position to obtain or retain business, including without limitation in violation of the Acts listed above.

9. Money Laundering

The Supplier shall act in accordance with all applicable international standards and laws on fraud and money laundering and (where appropriate) maintain an anti-money laundering compliance programme, designed to ensure compliance with the law including the monitoring of compliance and detection of violation.

10. Integrity

Suppliers must conduct their overall business with integrity and specifically must comply with the following principles:

Business Records

Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.

Interactions with Regulators

Act professionally and be honest, direct, and truthful with all regulatory agency representatives and governmental officials.

Media/Investors

Not speak to the media or investors on behalf of Burjeel unless the Supplier is expressly authorized in writing to do so by Burjeel.

Gifts

Avoid giving gifts to Burjeel employees. Suppliers may not offer anything of value to obtain or retain a benefit or advantage for the Supplier and may not offer anything that might appear to influence, compromise judgment, or obligate Burjeel or any Burjeel employee. Any gifts, meals, or entertainment must comply with applicable law, must not violate Supplier or Burjeel policies on the matter, and must be consistent with local customs and practices.

Conflicts of Interest

Avoid the appearance or actual improprieties of conflicts of interest. Suppliers must follow Burjeel's Conflict of Interest policies available on burjeelholdings.com.

Insider Trading

Not buy or sell the securities of Burjeel if they are aware of material non-public information about Burjeel. This prohibition also applies to Supplier employees.



Business Continuity and Crisis Management

Subject to the stricter requirements of any specific contractual provisions that apply, have adequate business continuity plans in place to continue to provide services to a reasonable degree in the aftermath of any kind of operational crisis, whether caused by a natural disaster, equipment malfunction, power failure, terrorist act or other event or occurrence. Upon request by Burjeel, furnish in reasonable detail the elements of its business continuity plan.

Animal Welfare

Perform animal testing only after consideration has been given to non-anima-based test methods, reducing the number of animals used, or refining procedures to minimize distress in animals being assessed. Use alternatives when scientifically valid and acceptable to regulators. Treat animals used in any testing or process humanely, minimizing pain and stress.

11. Labor practices and human rights

Burjeel expects its Suppliers to respect and promote human rights, including operating in compliance with the existing labour laws on Fundamental Principles and Rights at Work. Suppliers must comply, at a minimum, with the following labour, human rights, and employment practices:

Child Labor

Suppliers must not use child labor. No person may be employed that is younger than the legal minimum age for working in any specific jurisdiction and for the type of work involved. In no event may Suppliers employ workers that are younger than 14 years of age or younger than the age established for completing compulsory education, whichever is greater. Workers exposed to conditions that are hazardous to health and safety must be at least 18 years old.

Forced Labor

Suppliers must not use forced labor, whether in the form of indentured labour, bonded labour, or prison labour. Suppliers also must not support any form of human trafficking of involuntary labor through threat, force, fraudulent claims, or other coercion.

Compensation

Suppliers must fairly compensate their employees by providing wages and benefits in compliance with the local and national laws and regulations of the jurisdiction in which the Suppliers are doing business, or which are consistent with the prevailing local standards in the countries, if the prevailing local standards are higher.

Hours of Labor

Working hours must comply with local regulations. Where the country's laws and regulations do not address standard working hours, Suppliers must ensure that the work week does not exceed 60 hours. Supplier must provide workers rest days (at least one day off for every seven-day period) and leave privileges.

Discrimination/Fair Treatment

Supplier must not discriminate based on race, colour, national origin, gender, sexual orientation, religion, disability, or any other characteristic prohibited by applicable law. Suppliers must base all conditions of employment on an individual's ability to do the job, not based on personal



characteristics or beliefs. Suppliers must follow all applicable employment laws, must not engage in acts of verbal or physical harassment and must not utilize mental or physical disciplinary practices.

Diversity and Inclusion

Suppliers must provide an inclusive and supportive working environment for employees and respect and promote diversity and inclusion.

Freedom of Association

Suppliers must allow workers to exercise freedom of association.

Immigration Law and Compliance

Suppliers must only employ workers with a legal right to work. Suppliers must have in place procedures to ensure compliance with this requirement.

Employee Identification

Suppliers must not require their employees to lodge “deposits” or their identity papers (government-issued identification, passports, or work permits) with the Supplier or another person or entity. Employees must be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.

Employee Records

Suppliers must keep employee records in accordance with local and national laws or regulations and provide in a timely manner, via pay stub or similar documentation, the basis on which employees are paid.

12. Environmental, health, and safety (EHS)

Suppliers must develop and implement policies and procedures that are protective of human safety, health, and the environment, including the following:

Law and Compliance

Suppliers must comply with all EHS laws, regulations, ordinances, rules, product registrations, permits, license approvals and orders. This includes adherence to requirements that restrict the use of substances in the countries in which the Supplier does business.

Systems

Suppliers must develop and implement operating and management systems designed to detect, avoid, and respond to potential EHS risks and emergencies. Suppliers must have written EHS policies and systems to minimize work-related injury, illness, and environmental incidents.

Work Environment

Suppliers must maintain a healthy, clean, and safe work environment. This includes any residential facilities that a Supplier provides to its employees. Suppliers must construct and maintain all facilities in accordance with the standards set forth by applicable laws and regulations in the countries in which they operate.



Emergency Preparedness

Suppliers must be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first aid and emergency response supplies, appropriate fire detection and suppression equipment and adequate exit facilities. Suppliers must regularly train employees on emergency planning, emergency exit procedures and responsiveness.

Environmental Sustainability

Suppliers are expected to operate in an environmentally responsible and efficient manner and seek to minimize adverse impacts on the environment. Suppliers are expected to seek to conserve natural resources, avoid the use of hazardous materials where possible, and promote activities that reuse and recycle. Suppliers are expected to engage in the development and use of climate-friendly products and processes to reduce power consumption, water consumption, waste, and greenhouse gas emissions.

13. Confidentiality, data protection, and privacy.

Confidentiality

Suppliers must not disclose to others and must not use for their own purposes or the purpose of others any trade secrets, confidential information, knowledge, designs, data, skill, or any other information or intellectual property considered by Burjeel as “confidential” (“Burjeel Confidential Information”).

Data Protection

Suppliers must take appropriate steps to safeguard Burjeel’s Confidential Information or any information that could lead to the identification of individuals, including information that identifies individuals in combination with other information (“Personal Information”). Suppliers must manage, destroy, and return any documents or records, provided to them by Burjeel, in accordance with the specific direction provided by Burjeel.

Privacy

Suppliers must implement administrative, technical, and physical safeguards to ensure that employees, patients, healthcare professional and other third party’s privacy rights are protected in accordance with all applicable laws and regulations.

14. Records management

Suppliers are expected to maintain all business records and information honestly and accurately in compliance with all applicable laws regarding data retention and accuracy. Suppliers must maintain policies and procedures to create, retain, handle, destroy, return, and dispose of business records in full compliance with all applicable legal and regulatory requirements. Suppliers must return or destroy documents provided to them by Burjeel at the request and direction of Burjeel except for documents or information they need to maintain for legal or regulatory requirements.



15. Social media

Suppliers are expected to educate and train employees on the use of social media, which should be broadly understood to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner. Training is required to encompass communications regarding counterparties, such that Supplier employees do not give the impression that they are speaking on behalf of Burjeel or misrepresent or disparage Burjeel in any communications or online user forums. Although not an exclusive list, specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment.

16. Reporting and investigations

Suppliers must establish processes to enable their employees to report concerns or illegal activities through a formal reporting structure. Supplier must investigate reported incidents and take appropriate corrective action. Suppliers may not take retaliatory action against any employee who in good faith reports a concern, questionable behavior, or illegal activity. Suppliers must promptly report to Burjeel at cs@burjeelholdings.com any violation of the Supplier Code of Conduct. Suppliers must fully cooperate with Burjeel to take all reasonable measures to investigate and remediate any non-compliance with the Supplier Code of Conduct.

17. Reporting of questionable behavior and possible violations

We encourage suppliers to report concerns in relation to any actual or suspected breach of this Policy by directly contacting Burjeel's compliance officer at cs@burjeelholding.com

18. Governance

This Policy is overseen by the Board. Any material breaches of this Policy must be reported to the Compliance Officer for suitable action.



19. 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.

Organization Scope	Burjeel
Parent Process	Compliance Program
Document owner	Compliance Officer
Approved by	Burjeel Board of Directors
Initial date published	To be updated post approval
Document effective date	To be updated post approval
Document updated as per	-
Contact person	Compliance Officer
Version	1.0