



**POLICY OF THE POLICIES  
INTRODUCING NEW POLICIES OR AMENDING EXISTING  
POLICIES**

**Burjeel Holdings PLC**



## 1. SCOPE & INTRODUCTION

This policy of the policies introducing new policies or amending existing policies (the “Policy”) applies to all Burjeel employees, officers, contract staff, directors, permitted assigns, and other third parties authorized to represent (collectively referred to as the “Employees”) Burjeel Holdings PLC, its subsidiaries and affiliates (“Burjeel”).

Burjeel is committed to developing and maintaining policies that facilitate achievement of its strategic objectives, address key risks, and that provide transparency and clarity and are applied consistently.

Burjeel companies develop, implement and manage their policies in a manner ensuring that those policies are aligned with the relevant Burjeel company’s strategic objectives and, as applicable, the collective strategic objectives of Burjeel.

Compliance with this Policy may be monitored proactively and transgressions may lead to investigations and further action according to applicable laws.

## 2. PURPOSE

The purpose of this Policy is to ensure that Burjeel companies introduce new (or amended) policies in a consistent manner through adherence to its policy management framework that comprises the following:

- a. Policy types
- b. Proposal to introduce/amend a policy
- c. Operational procedures
- d. Communication and implementation
- e. Policy storage, review, and maintenance

## 3. POLICY TYPES

Burjeel companies will have policies whose overall impact may vary depending on the nature of the policy. In other words:

- a. Compliance and governance policies – policies which relate to governance and compliance issues whose impact may be felt only by a subset of stakeholders.
- b. Operational policies – policies which relate to specific aspects of the operations or administration of the relevant Burjeel company.

However, for the purposes of this Policy, the approval of both classes of Burjeel company policy is to be handled the same way.

With regard to policy development, policies must be aligned with the Burjeel’s strategy and values, comply with relevant laws and regulations, and only be introduced or amended where there is a genuine need for a policy and its introduction will be in the best interests of the relevant Burjeel company.



#### **4. PROPOSAL TO INTRODUCE OR AMEND A POLICY**

The need for a new or amended policy can be triggered by a range of events such as a change in legislation or subordinate regulations, changes to the underlying business of the relevant Burjeel company, or the identification of gaps in the current operational set-up. Regardless of the reason(s), proponent departments/functions are required to inform the Compliance Officer and the Company Secretary in advance of their intention to introduce a new or amended policy. No new or amended policy may be issued without the review of the Burjeel’s CEO, Compliance Officer, Company Secretary and General Counsel. Without prejudice to any legal or regulatory requirements or any requirements under the Charters of the Board Committees, the Compliance Officer may designate reviewers for any new or amended policy. In addition to the review by the General Counsel and Compliance Officer, all new or amended policies must be reviewed by the CEO and CFO/Deputy CFO and approved by the Board of Directors of Burjeel Holdings PLC (the “Board”) or that of the relevant Burjeel company.

It is acceptable for the advance notice of a new or amended policy to be provided by way of an email communication to the Compliance Officer, but it should be brief and cover (for each proposed policy or proposed amendment to an existing policy), amongst other topics, its:

- a) Purpose
- b) Scope
- c) Impact
- d) Resource needs, if any, for development/implementation/monitoring
- e) Interaction with other policies, if any
- f) The need for associated new/amended procedures, if any
- g) Training needs, if any

#### **5. OPERATIONAL PROCEDURES**

It is for the Policy Custodian (being a person named in each policy) to determine for itself how to handle the operational aspects of policy introduction. However, it should ensure that the following issues are covered:

- a. Initial stakeholder discussions and policy drafting.
- b. Adoption of a policy layout that is consistent with this Policy (i.e. in terms of font, branding, the headings of sections 1 to 4 of the proposed new or amended policy, and the definitions section at the end of the document.
- c. Stakeholder consultation of drafting policy documents.
- d. The policy approval process, provided that the policy is reviewed by the CEO and CFO/Deputy CFO and approved by the General Counsel and the Compliance Officer.
- e. Communication, implementation, and monitoring/review (including how frequently the policy should be reviewed in future by the Policy Custodian).



Compliance Officer should also advise as to whether the proposed policy requires Board approval or executive approval, the approval process being as follows:

- h) For a new or amended policy, it should be reviewed by the CEO and CFO/Deputy CFO and approved by the CEO and the General Counsel and the Compliance Officer.
- i) Where Board approval is required, after the new or amended policy has been approved as noted above, it should be sent to the Company Secretary for approval by the Board.

## 6. COMMUNICATION AND IMPLEMENTATION

The Policy Custodian remains responsible for communication relating to the new or amended policy and, as applicable, for the creation and distribution of new or modified procedures that enable adherence to the provisions of that new or amended policy. Regarding implementation, the Policy Custodian should consult with other stakeholders in advance of the launch/introduction of the new or amended policy in order to confirm that any requisite changes (to procedures or ancillary matters) will be in place before the date of launch/introduction.

## 7. REVIEW AND MAINTENANCE

A policy should be reviewed if there are legislative changes, changes to the business that impact the policy, or concerns relating to the inherent risk and related controls of post-introduction policy reviews, this being the responsibility of the Policy Custodian.

## 8. POLICY REPEAL

In the same way as for a policy introduction, a policy may only be repealed using essentially the same process, but in reverse, involving the same stakeholders and the same approval process.

## 9. POLICY APPROVAL

This Policy shall be reviewed and approved by the Board. This Policy shall be effective from the date of approval by the Board. All amendments to this Policy will be done in compliance with applicable laws and will require approval by the Board. The Compliance Officer is the custodian of this Policy.

## 10. DOCUMENTATION AND REGULAR REVIEW

Organization Scope	Burjeel
Parent Process	Compliance Program
Document owner	Compliance Officer
Approved by	Burjeel Board of Directors
Initial date published	February 10, 2023
Document effective date	February 10, 2023
Document updated as per	-
Contact person	Compliance Officer



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Burjeel’s Compliance Officer shall periodically evaluate the effectiveness of this Policy, and review and revise it as necessary, including to reflect any changes required by applicable laws. You can direct any suggestions for improvements to this Policy to Burjeel’s Compliance Officer at [cs@burjeelholdings.com](mailto:cs@burjeelholdings.com).