

ETHICAL BUSINESS CONDUCT POLICY

Jodoa Properties L.L.C (hereinafter referred to as “Jodoa”) recognises the importance of adhering to the principles of ethical business conduct in the delivery of its activities and is committed to operating its business sustainably and responsibly and in full compliance with all relevant laws and regulations. This policy applies to all of Jodoa, its officers, directors and employees, whether permanent or temporary. It also applies to all Jodoa supply chain partners, including agents, consultants, joint venture partners and sub-contractors (“Associated Persons”).

Ethical business conduct includes:

BRIBERY PREVENTION

The giving or receiving of bribes is contrary to the Federal Decree-Law No. 36 of 2022 (the UAE Penal Code) and can play no part in the way in which Jodoa carries out its business. The steps for complying with the UAE Penal Code are set out in the section, “How to comply with the UAE Penal Code”.

FAIR AND OPEN COMPETITION

Jodoa is committed to adhering to Federal Law No. 36 of 2023 on the Regulation and Protection of Competition and ensures full compliance with all UAE competition laws. Jodoa upholds the principles of fair and efficient competition and does not engage in any anti-competitive practices, such as abuse of dominant position, entering into agreements which restrict, prevent or distort competition, or engaging in any other conduct that violates the provisions of the aforementioned law.

FRAUD PREVENTION

Jodoa adopts a zero-tolerance approach to fraudulent activity in compliance with the Federal Decree-Law No. 31 of 2021 and relevant UAE anti-fraud regulations. All employees and Associated Persons are required to act with integrity, and Jodoa will investigate all reports of suspicious or dishonest behaviour promptly and thoroughly.



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WHISTLEBLOWING

Jodoa encourages employees and Associated Persons to raise their concerns about any malpractice, misconduct, or illegal activity at the earliest possible stage. This is commonly known as “whistleblowing”.

CONFLICT OF INTEREST

Jodoa recognises the importance of, and fully supports the need to, avoid and/or manage conflicts of interest. Employees or Associated Persons who become aware of a conflict of interest must report the details to Jodoa’s Managing Director without delay. This policy is a declaration of the Jodoa’s intent to ensure all employees and Associated Persons act, and are seen to act, with uncompromising honesty, integrity, and transparency in everything they do.

DATA PROTECTION IN ETHICAL OVERSIGHT

Where ethical oversight activities involve the collection or processing of personal data, Jodoa ensures that such activities are conducted in full compliance with applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 (“GDPR”) where relevant. This includes:

- Ensuring that personal data collected through whistleblowing, fraud investigations, or conflict of interest disclosures is processed lawfully, fairly, and securely.
- Limiting access to sensitive data to authorized personnel only.
- Protecting the confidentiality and dignity of individuals involved in any ethical review or investigation.
- Ensuring that third-party partners involved in ethical oversight are contractually bound to GDPR-compliant standards.
- Providing transparency to data subjects and respecting their rights under applicable data protection laws.