

MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Jodoa Properties L.L.C (hereinafter referred to as “Jodoa”) is committed to preventing unethical labour practices occurring in any part of our business operations or in any part of our supply chain. This Policy applies to all Jodoa employees as well as, contractors, suppliers and joint venture partners, who must ensure that their businesses and supply chains work to our highest ethical standards and comply with this Policy. Jodoa will take steps to ensure that labour abuses including, modern slavery and human trafficking are not taking place in our operations or in that of our supply chain.

We will ensure that:

- Any reports of labour abuses will be quickly and sensitively investigated, with the protection of victims being paramount. Investigations will be conducted in full cooperation with the Dubai police and the Ministry of Human Resources and Emiratization (MOHRE).
- All recruitment is carried out in a fair and transparent manner and will comply with relevant legislation and standards, notably the UAE Federal Decree Law No.33 of 2021 (UAE Labor Law).
- We engage with the supply chain to communicate our expectations in relation to the UAE Labor Law, which will be clearly communicated and included within contractual terms.
- Suppliers will be expected to comply with the UAE Federal Decree-Law No. 29 of 2021, governing the entry and residence of foreign workers.
- Jodoa will take a partnership approach with regards to working with its suppliers to ensure that they are abiding by the UAE Federal Decree Law No. 24 of 2023 on combatting human trafficking and to combat the threat of modern slavery and human trafficking across its sectors and all the industries in which it operates.
- Jodoa will train appropriate staff to understand the risks and issues surrounding modern slavery and human trafficking, including how to identify it and appropriate measures to prevent it.

All employees have an individual responsibility to ensure compliance with this Policy, including being alert to the risk of such unlawful practices and reporting anything suspicious. Any concerns may be reported to the Managing Director. Modern Slavery and human trafficking are serious criminal offences and a violation of fundamental human rights. Any violation or breach of this Policy or any of the above-mentioned UAE regulations by an employee will result in disciplinary action, up to and including dismissal in appropriate circumstances. In addition, Jodoa will notify the relevant authorities of an individual or a supplier's contravention of the relevant regulations. This Policy will be reviewed to ensure that it reflects current legislation and regulations.



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Data Protection in Ethical Labor Oversight

Where activities related to the prevention of modern slavery and human trafficking 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 during investigations, recruitment audits, or supplier assessments is processed lawfully and securely.
- Limiting access to sensitive data to authorized personnel only.
- Protecting the confidentiality and dignity of individuals involved in any report or investigation.
- Ensuring that third-party partners involved in labor oversight are contractually bound to GDPR-compliant standards.
- Providing transparency to data subjects and respecting their rights under applicable data protection laws.