



Environmental, Social and Governance ESG

Suppliers and Subcontractors Code of Conduct Policy

Procurement Department

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Introduction

MAN Enterprise Group ("MAN") is a Grade A Building & Infrastructure Contractor and a landmark builder in the Middle East & Africa with nearly 50 years of history.

MAN is composed of six main subsidiaries, namely MAN Enterprise for Building & Infra EPC Contracting, Metrix for Electro-Mechanical Contracting, Tecman Industry for Fit-Out Contracting and Wood & Steel Manufacturing, La Toscana Impianti Internazionale for Oil & Gas, Hausman for Facility Management and Mondis for Waste Management.

MAN's diverse portfolio includes hotels & resorts, high rise commercial & residential buildings, residential complexes, villas, shopping malls, universities & schools, roads, bridges, utility tunnels, sewage treatment plants, desalination plants, power plants, chemical complexes, storage tanks.

Following MAN's participation to the ESG Stewardship Program, MAN was awarded the Environmental, Social, and Governance (ESG) certificate in recognition of its commitment and motivation towards sustainability. With this significant achievement, MAN is now focused on implementing measures to fulfill our ESG commitment and goals.



Environmental, Social & Governance (ESG) Policy Statement



Policy Scope

This policy applies to the operations of MAN Enterprise Group (MAN) globally.

Purpose

This ESG policy statement confirms MAN's adherence to environmental, social and governance principles to promote sustainable business practices.

Principles and Strategy

MAN commits to establishing a dynamic environmental and social management system (ESMS) which comprises key elements. The elements encompass developing pertinent policies and procedures, identifying and managing risks, building management programs, conducting training, spreading awareness, and boosting organizational competency, putting in place emergency preparedness and response plans, engaging and empowering stakeholders, establishing internal and external communication channels, embracing comprehensive reporting, and implementing robust monitoring with clear measurable targets. By placing ESG at the heart of its business values, MAN reaffirms its commitment to promote sustainable practices in the construction industry.

Oversight and Implementation

The Board of Directors bears the responsibility of overseeing, approving, and regularly reviewing and revising the company's ESG policy along with related ESG strategies embraced by the Group.

Environmental Stewardship

Focus:

MAN strive to reduce our environmental footprint and carbon emissions to promote sustainable environmental practices. MAN commit to identify environmental risks resulting from our business operations and eliminate, or if not possible, mitigate these risks.

Actions:

- Reducing carbon emissions , aiming to reduce environmental and financial costs
- Reducing wastes generated, including steel and wood, and promoting recycling and reuse techniques
- Reducing wastewater and implementing systems to integrate all the data related to wastewater across time, aiming for robust monitoring
- Reducing noise pollution resulting from business operations
- Safeguarding cultural heritage sites
- Optimizing resource usage, including raw materials and energy
- Reinforcing a culture of sustainable practices among suppliers and contractors

Social Responsibility

Focus:

MAN commits to foster a diverse, inclusive, and equitable culture, preserving the well-being and safety of all stakeholders, including employees, partners, suppliers, local communities, and others. MAN strive to make a positive impact on the society, while abiding by best international practices within the construction industry.

Actions:

- Promoting a diverse, equitable, and inclusive workplace
- Protecting children's rights
- Safeguarding the rights of minorities and migrant workers
- Combatting violence, discrimination, and harassment in the workplace
- Promoting a safe, healthy, and secure workplace
- Fostering a safe and healthy community
- Safeguarding the rights of indigenous peoples

Corporate Governance

Focus:

MAN values the significance of implementing sound governance principles. MAN commit to adopt an appropriate balance of the board to promote principled decision-

Actions:

- Promoting sound corporate governance practices
- Sustaining diversity within the board
- Nominating board members with an ESG skill matrix
- Environmental Stewardship, Social Sustainability & Governance (ESG) Policy Statement
- Instituting robust ESG management practices including risk management, internal controls, and audit processes
- Ensuring transparency and disclosure of pertinent information in a timely manner
- Fostering a culture of integrity through a comprehensive code of ethics, code of conduct, and regular training

Approved by the Board of Directors on: 30 April 2024 Signed by Chairman :Thierry Abi Nader





Policy

Acknowledgement

The Procurement Department is responsible for guaranteeing that every supplier/subcontractor, upon entering any contractual arrangement with MAN, completes the acknowledgment form provided in this policy. By doing so, the supplier/subcontractor confirms the following:

1. Receipt of a copy of this policy.
2. Comprehension of this policy.
3. Commitment to comply with this policy.

General Standards

1. MAN requires that any supplier/subcontractor providing its goods, products, material, or services acknowledges and agrees to comply with the standards referred to in this policy.
2. The suppliers/subcontractors should be responsible to support MAN's ESG objectives.
3. The supplier/subcontractor shall ensure that its facilities are designed and operated safely and that its business operations adhere to the relevant environmental protection laws, regulations, policies, and initiatives established by the local authorities in each country of MAN's operation.
4. This policy shall be incorporated in supplier/subcontractor's contractual obligations to MAN.
5. Failure to adhere to this policy will result in potential exclusion from present and future contractual collaboration with MAN Group.



Environmental Standards

1. Suppliers/Subcontractors shall demonstrate a clear comprehension of the environmental impacts and risks linked to the products, material items, and services they offer.
2. Suppliers/Subcontractors are anticipated to lessen environmental impact, formulate suitable protocols for overseeing and managing security controls. Suppliers/Subcontractors are required to maintain documentation enabling them to address information inquiries, encompassing aspects such as resource consumption, emissions, compliance, environmental risks, liabilities, and other measures of environmental sustainability.
3. Suppliers/Subcontractors shall follow the below measures:
 - A. Acquiring and maintaining any needed environmental permit.
 - B. Using resources effectively by applying practical measures that incorporate energy-efficient and environmentally mindful technologies.
 - C. Reducing waste and emissions.
 - D. Reducing adverse effects on biodiversity, climate, and water resources by primarily emphasizing actions to predict and prevent negative impacts. In cases where avoidance is not feasible, efforts should be made to diminish the impacts, and if impacts do arise, restoration or rehabilitation of affected areas should align with potential offset measures.
 - E. Supervising the proper disposal of hazardous materials and waste using qualified personnel and handling it at a receiving center with full licensing.
 - F. Overseeing, regulating, and responsibly treating discharges generated from activities.
 - G. Establishing key performance indicators to monitor adherence to implemented environmental practices.



Social Standards

Suppliers/subcontractors should operate their businesses in alignment with the highest social norms and adhere to these requirements in each of the following domains:

Human Rights Laws

Suppliers and subcontractors should comply with the human rights laws relevant to their operational location and establish their unique strategies for upholding human rights.

Health, Safety and Security Practices

- Suppliers and Subcontractors shall follow MAN rules and guidelines about health, safety, security and working conditions. This includes taking care of workers' well-being, cleanliness, preventing fires, managing risks, and ensuring safety in electrical, mechanical, and structural areas.
- Suppliers and Subcontractors are required to ensure the necessary security measures and follow security requirements for any services they provide. MAN won't tolerate any events that could induce a risk to its physical, cyber or information security.
- Suppliers and subcontractors shall follow these compliance rules, among others:
 - A. Provide proper safety training and necessary safety gear for their employees.
 - B. Keep records of safety training and monitor how safely work is being done.
 - C. Make sure their employees follow health and safety rules and work in a way that doesn't put anyone at risk.
 - D. Promote good health and hygiene practices among their employees.

No Forced and Child Labor

Suppliers and subcontractors shall ensure they and any other companies they engage with follow all the laws and rules in the country where they operate. This includes paying employees fairly, giving them reasonable working hours and meeting the minimum age requirements for hiring workers according to local laws. Suppliers and subcontractors are not allowed to use any form of modern slavery, such as forced labor or child labor. They also can't be involved in human trafficking or use any kind of abuse or threats to control their workers.

Diversity, Inclusion and Protection against Gender-based Violence

MAN wants its suppliers and subcontractors to embrace inclusivity and make sure that all their employees, suppliers and subcontractors are treated fairly, with dignity and respect, with no different races, genders, educational levels, languages, skills and experiences, inequality, or discrimination. Suppliers and subcontractors should prevent discrimination or harassment based on factors like ethnicity, national origin, race, color, gender, age, or disability. MAN is fully committed to provide training to all the

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employees on gender-based violence code of conduct, and it anticipates that its suppliers and subcontractors will similarly engage in MAN's training initiative in this respect.

Anti-Harassment

- Suppliers and subcontractors have a role in making sure no one experiences any type of harassment and shall provide a workplace that's harassment-free, meaning there should be no discrimination, victimization or bullying, gender-based violence, and everyone's dignity is highly valued.
- To meet these standards effectively, suppliers and subcontractors are expected to have policies in place that explicitly forbid harassment and discrimination or at least abide by MAN policy on anti-harassment.

Wages and Hours

Suppliers and subcontractors should provide a wage to their employees that allows for a decent standard of living according to the local conditions while complying with laws and regulations in the country of operation.

Corporate Social Responsibility

Suppliers and subcontractors shall ensure their business activities follow strong Corporate Social Responsibility (CSR) standards. This means they should actively engage in and support social practices that benefit society.

Whistleblower Protection Policy and Anonymous Complaints

Suppliers and subcontractors should establish procedures to safeguard the confidentiality of their employees who report concerns in good faith or decline orders that go against this policy. They must also ensure that there's no retaliation against such employees. Suppliers and subcontractors need to offer a way for their employees to anonymously report workplace issues in line with the relevant laws and rules.

Grievance Mechanism

MAN utilizes its website (<https://www.manenterprise.com/>) as a platform for communication and interaction with suppliers, subcontractors, service providers, and community members. Any feedback, whether it be concerns, compliments, or complaints, that is received from the public is subsequently forwarded to the appropriate managers for a response. These managers then conduct trend analysis and share the resulting reports with the management team for evaluation.

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Governance Standards

Suppliers and subcontractors are required to share details about their business operations, how they are structured, their financial status and any legal cases involving MAN or anything that could affect MAN's reputation and operations. Suppliers and subcontractors shall also operate in compliance with the relevant laws, regulations and industry standards and run their business ethically and always maintain high standards of honesty and integrity. The governance expectations encompass the following elements:

Compliance with Laws, Regulations, this Policy and any Contractual Arrangements with the Supplier/Subcontractor

Suppliers and subcontractors, when working on MAN projects within a particular country, should follow the laws, rules, instructions, and other legal requirements of that country.

Business Ethics

- Suppliers and subcontractors shall fully comply with Anti-Bribery Laws. These laws forbid giving anything valuable to anyone or any entity with the aim of gaining an unfair business advantage. It is not allowed to offer or request bribes, whether directly or through a third party.
- Bribery can take the form of asking for, accepting, or receiving gifts, payments, or promises of such, meant to benefit a MAN employee or others. Bribery can also happen due to requests, recommendations, or intercessions.
- Bribery covers gifts, payments, or promises of payment, as well as any advantage or privilege gained by the person receiving the bribe, regardless of what form it takes, and even political or charitable donations.
- Suppliers and subcontractors need to establish and enforce policies, codes of conduct, and procedures to prevent any bribery, corruption, or fraud.

Fraud, Anti-counterfeit and Transparency

- Suppliers and subcontractors shall abide by MAN's policy against fraud and anti-counterfeit and are expected to share this commitment and follow the right regulations, procedures, practices, and this policy.
- MAN requires accurate financial and other records related to the contract or agreement to be maintained. Suppliers and contractors should keep precise business records throughout their contractual relationship. Legal obligations also mandate the retention of such records even after the completion of contracts as requested by local laws and regulations. Falsifying documents is strictly prohibited, and suppliers should promptly report any attempts to manipulate information in MAN's records to MAN management or its internal audit.
- Suppliers are responsible for the sourcing of supplies and materials and must confirm their authenticity. If requested, suppliers must provide information about the source of any parts, materials, or imported goods.



Fair Competition Laws

Suppliers and subcontractors should operate their businesses fairly and in compliance with relevant laws, including the Competition Law and its Implementing Regulations. They should not participate in practices like colluding on bids, price discrimination, or any unfair trade activities. Suppliers and subcontractors should also maintain fair business practices when it comes to advertising and sales.

Intellectual Property

- Every supplier and subcontractor shall ensure that their own network of suppliers respects the intellectual property rights of others.
- Suppliers and subcontractors shall take all necessary measures to protect sensitive information related to MAN's intellectual property. They shall keep this information confidential and not share it with anyone else, unless required by law or authorized by MAN. If the supplier or subcontractor is aware of any infringement relate to MAN's intellectual property rights, they shall promptly inform MAN. Also, when the business relationship ends, they shall return MAN's sensitive information or certify its deletion from their records according to the procedures set by GDPR policy.
- Suppliers and subcontractors shall not use MAN's trademarks, logos, assets, or any other intellectual property rights without prior written consent. They also should not promote MAN's name into their own products, goods, or services.

Confidentiality

Suppliers and subcontractors shall treat all confidential information with utmost care and keep it undisclosed. They should not use, share, divulge or communicate this information, whether directly or indirectly, unless it's necessary for the execution of their contractual obligations towards MAN and they have received prior written approval from MAN. Any exceptions shall be governed by a written agreement with MAN authorizing the release of the information. Suppliers and subcontractors should also avoid any misuse or inappropriate handling of confidential information, whether directly or indirectly, and should only use it as required by the law.

Misrepresentation and Use of MAN Name

Suppliers and subcontractors shall not be entitled to representing MAN unless they have received written authorization to do so.



Monitoring and Compliance

- Suppliers and subcontractors shall always follow the rules set in this policy. They are also responsible for ensuring their employees understand and comply with these standards. They also need to ensure that their own suppliers follow the same standards required by MAN.
- If Suppliers and subcontractors discover any actual or potential violations of this policy, they must promptly inform MAN and propose plans to remedy these violations.
- Suppliers and subcontractors should keep records that prove they are following this policy and provide these records to MAN when requested.
- While no policy can cover every possible situation, MAN expects its suppliers and subcontractors to use their professional judgment and discourage any wrongdoing when carrying out their duties on behalf of MAN.



Acknowledgement Form

MAN requires all suppliers, vendors, manufacturers, and subcontractors who conduct any business with MAN to acknowledge and agree to follow the highest ethical and legal standards and the policies and principles outlined in this ESG Suppliers and Subcontractors Code of Conduct Policy.

To acknowledge MAN's ESG Suppliers and Subcontractors Code of Conduct Policy, an authorized person empowered to act on behalf of the supplier/subcontractor shall sign it.

If MAN becomes aware of violations of the ESG Suppliers and Subcontractors Code of Conduct Policy by a supplier/subcontractor, it will require the latter to remedy to such breach. In case of failure, MAN may, at its sole discretion, choose to terminate its business relationship with that supplier/subcontractor.

I the undersigned, _____ duly empowered by _____, hereby confirm that I will follow and ensure that employees, officers, directors, agents and representatives of _____ involved in activities related to bidding, providing goods and services to MAN, and carrying out agreements with MAN shall abide the rules and principles set in MAN's ESG Suppliers and Subcontractors Code of Conduct Policy.

Name and Job Title

Date

Stamp and Signature