



CODE OF CONDUCT
2025

ABOUT DAMAC DIGITAL

WHAT WE DO

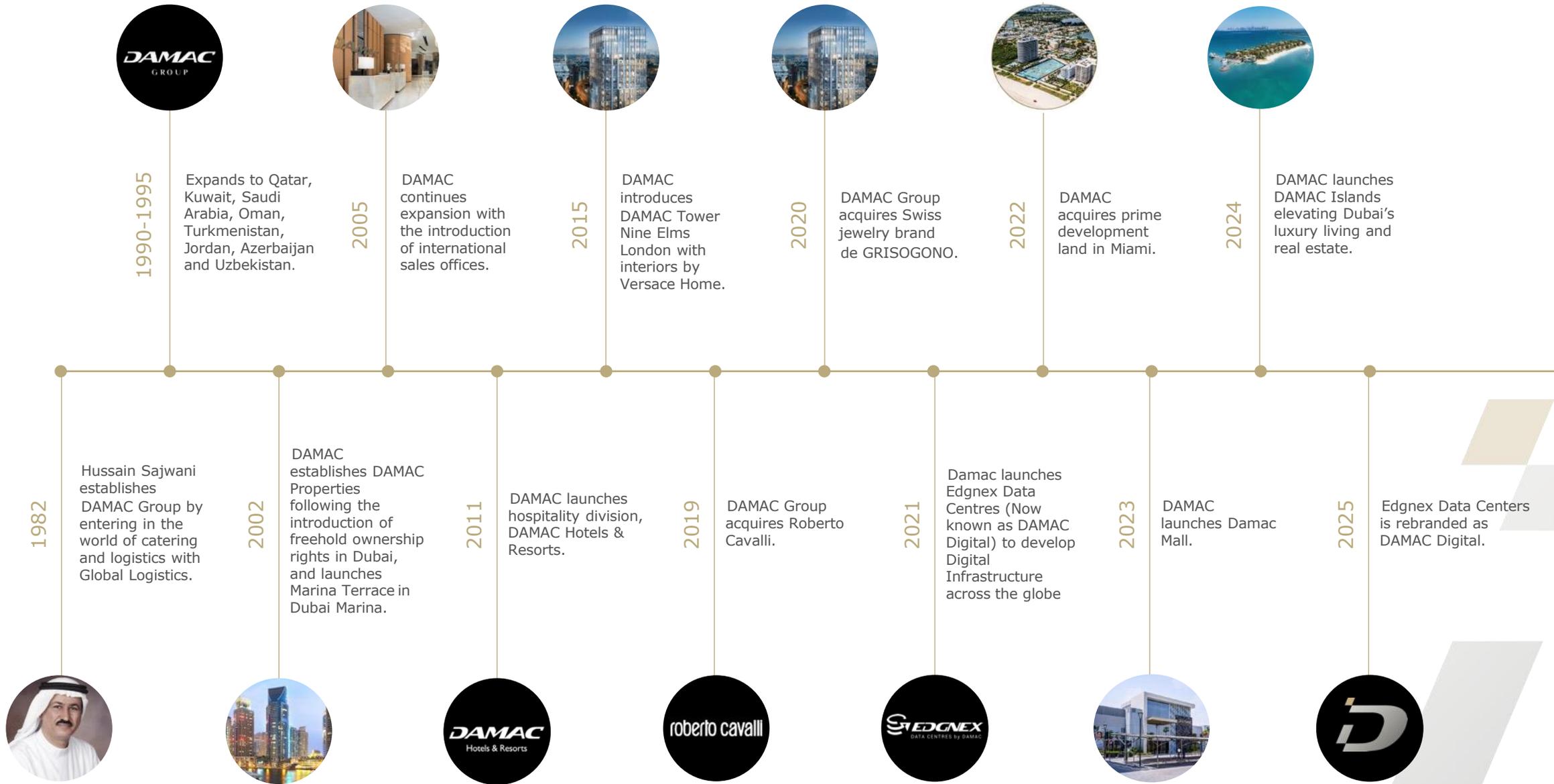
DAMAC Digital provides agile, world class AI ready data centers, purpose-built for hyperscalers and growth focused organizations. We enable our partners to enter high-growth and emerging markets with infrastructure designed to scale seamlessly alongside their ambitions.

HOW WE DO

With an obsession for delivering impact for our customers, we handle every step of market entry—from strategic site selection to turnkey data center delivery. Our infrastructure excellence, robust financial foundation, and agile project management ensure reliable performance and rapid deployment in high-demand regions.

A photograph of a data center aisle with rows of server racks. The racks are illuminated with warm, golden light, and there are glowing orange lines overlaid on the image, suggesting data flow or connectivity.

DAMAC Digital is building
the backbone of the
AI-driven digital economy.



OUR DIFFERENTIATOR: WHAT SETS US APART



Local Presence, Global Reach

Leveraging our extensive network to provide personalized, local support with the capability to execute projects globally.



DAMAC Group's Legacy of Infrastructure Excellence

Building on DAMAC Group's decades of real estate and infrastructure expertise to deliver top-tier data center solutions.



Financial Stability and Robust Backing

Powered by DAMAC Group, DAMAC Digital has strong financial stability, ensuring the capacity to undertake and deliver large-scale projects.



Global and Fast Delivery Expertise

Proven track record in executing large-scale, complex projects around the world, ensuring reliability and excellence in delivery.



Innovative and Ultra High Power Density Solutions with AI readiness

Our data centers are designed to support high-performance AI workloads, ensuring optimal infrastructure for advanced computing needs.



International Talent and Industry Expertise

Our team comprises global talent and industry experts, bringing unparalleled knowledge and value to our data centers.



Carrier-Neutral Connectivity

Offering diverse connectivity options to ensure flexibility and choice for our clients, enabling seamless integration with multiple carriers.



Comprehensive Security and Fire Protection

Employing state-of-the-art surveillance and fire protection systems to safeguard our clients' critical assets.



Sustainable and Energy-Efficient Solutions

Implementing green building practices and energy-efficient technologies to reduce environmental impact and operational costs.

MESSAGE FROM OUR LEADERSHIP

Dear DAMAC Group Professionals,

Our Code of Conduct and Ethics is embedded in DAMAC's culture. It reflects our core values and guides us to act with integrity in a diverse, unified, and collaborative workplace. As industry leaders, we uphold and champion the highest ethical standards, well beyond legal requirements.

In a world of rapid change, driven by advances in AI, shifting geopolitical landscapes, and growing climate-related regulations, DAMAC remains firmly committed to fulfilling its social responsibilities and delivering lasting value to our clients.

The Code is your daily guide to making responsible decisions that align with DAMAC's values. It serves as a roadmap, outlining key rules and providing links to policies and resources to help you understand what is and is not acceptable in the decision-making process. Please take the time to read it carefully, refer to it regularly, and use it as a reference when navigating complex situations. If in doubt, reach out to your manager, Compliance Director, or your HR partner.

Our reputation and success depend on each of us living by DAMAC's values and conducting ourselves with integrity in all business dealings. Regardless of role or location, we all share the responsibility of upholding the standards set out in our Code.

Thank you for your continued dedication to upholding our ethical values and helping us operate responsibly and with integrity.

You can contact any leader within the business or any HR representative, or you can ask me personally at Codetofollow@damacgroup.com.

Hussain Sajwani

Founder & Chairman



A close-up photograph of a fountain pen with a green and gold finish, resting on a document with Arabic text. The background is blurred, showing more of the document and the pen's nib.

PURPOSE OF CODE OF CONDUCT

DAMAC Digital CODE sets out our principles and expectations and has the following four main purposes:

1. To set clearly the behaviour we expect from you
2. To provide guidelines to help you apply our values
3. To enable you to raise a concern or ask a question if you are in any doubt
4. Give you the comfort that retaliation against raising genuine concerns is not tolerated

The core values on which this CODE is built are as follows:



Integrity

We are honest and choose the path of integrity in all business transactions and dealings with others



Ethics

We act ethically in every business context



Compliance

We comply with all applicable laws, regulations and DAMAC Digital policies that govern our business



Mutual Respect

We treat individuals with respect and dignity



Teamwork

We work together as a team to benefit DAMAC Digital



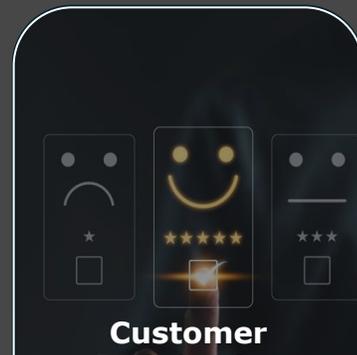
Communications

We share information effectively with each other, but also know how to protect the confidentiality of our information



Innovation

We innovate and seek new and creative approaches to problem solving



Customer Satisfaction

We treat customer satisfaction as a top priority



Quality

We incorporate excellence and quality in our work and strive to continuously improve



Fairness

We deal fairly with customers, suppliers, partners and colleagues

RESPONSIBILITIES

Our Leaders have extra responsibilities under Code of Conduct.

OUR PRINCIPLE

Tone is set at the top. Leaders, no matter how high in the managerial hierarchy, are expected to be good role models that demonstrate the behaviors and principles described in the COC and DAMAC Digital policies. Leaders also have an important role in making sure that their teams understand how the COC and DAMAC Digital policies apply to their day-to-day work. Thus, anyone managing other employees have additional responsibilities under this CoC.

These additional responsibilities include:

- Ensuring accessibility of the COC for all employees by making it available on the internal platform of DAMAC Digital. This will enable employees to access and review the COC at all times;
- Speaking with employees about ethical issues and making sure employees are aware of and understand the rules and requirements set in the COC;
- Ensuring employees complete on time training on ethical issues;
- Monitoring employee compliance with the COC;
- Ensuring that third parties with whom we engage are aware of and comply with these policies and standards as appropriate;
- Supporting people who raise ethical issues or concerns and ensuring that such issues or concerns are adequately and effectively addressed by DAMAC Digital;
- Not retaliate against employees who raised legitimate concerns .

By fulfilling these responsibilities, leaders help embed DAMAC Digital's values into the workplace and ensure that compliance is not just a policy, but a practice.



APPLYING THE CODE OF CONDUCT

The Code of Conduct applies to DAMAC Digital Data Centres, all its subsidiaries and to the third parties with whom we conduct business.

We expect you to comply with this COC. If found to be in breach of the COC, you may face disciplinary action. Disciplinary actions as deemed appropriate by Senior Management and in accordance with applicable laws and internal procedures. Where we use the term “you” in this COC, it includes all employees of the DAMAC Digital and its subsidiaries and joint ventures in which DAMAC Digital holds a controlling interest* .

It also includes all contractors, suppliers, vendors and consultants working for or providing goods and services to DAMAC Digital, as we expect our contractors and consultants to comply with the COC when they undertake work for us. The COC also, to the extent permissible, applies to our Business Partners, Suppliers, and other Third Parties with whom we work or who represents us or act in our name or for our benefit. We expect all our Business Partners, Suppliers and Third Parties to adhere to the requirements and expectations set out in this COC.

*Controlling Interest: Where DAMAC Digital maintains 51% or more shareholding.

SPEAK UP! HOW TO RAISE A CONCERN OR ASK A QUESTION

DAMAC Digital Code of Conduct applies to all of us and to the third parties with whom we deal.

Reporting unethical behaviour:

If you believe you have experienced or witnessed unethical behavior at DAMAC Digital you have a responsibility to do something about it. We want to assure you that you can raise a concern in a secure and confidential way and that any such concerns and allegations will be properly and seriously addressed and investigated.

DAMAC Digital prohibits any form of retaliation against individuals who raise concerns in good faith.

You should start by addressing your concerns with your line manager. If that is not appropriate given the circumstances, or if this proves, for some reason, unsatisfactory, you can contact your Human Resources representative or a Senior Leader in your work area.

If you do not feel comfortable raising your question or concern through any of the above channels, employees as well as third parties can contact the Head of Compliance and/ or the Head of the Audit Committee.

No retaliation

DAMAC Digital is fully committed to protecting the rights of those individuals who report issues in good faith and to maintaining the independence, impartiality, effectiveness and confidentiality of the reporting process. Your identity will be kept confidential to the fullest extent possible. Reports will be shared only with those responsible for investigating or addressing the concern. Any retaliatory conduct may also result in contractual or legal consequences.

All investigations will be undertaken in line with DAMAC Digital's Whistleblowing Policy.





Can I find out what is happening about my concern?

Regardless of whether you report in person, by phone or online , provided it is legally permissible to do so and to the extent it does not harm the review process, you will be given an update so that you can contact the management to find out what is being done . The timing and content of the update is decided by the persons entrusted with investigating the concerns and allegations you have raised. Although it may not be possible to provide you with any details of the investigation per se, due to privacy regulations or other local legal restrictions, you will, at the very least, be informed that a formal review has been initiated and when the review has been concluded.

Do I have to be absolutely sure that there is a problem?

No. So long as you report your real and honest concerns in good faith you will not be penalized in any way, regardless of outcome.

Do I have to give my name?

In the spirit of an open work culture, we encourage you to give your name because

it will make it easier to investigate your concern if we need to talk to you again to obtain further details. We will keep your name confidential if that is your wish. Any personal data collected during the reporting process will be handled in accordance with DAMAC Digital's Data Privacy Policy. You may request access to your personal information submitted in connection with your report.

Who at DAMAC Digital will know about my call or email?

DAMAC Digital Legal department employs case management for all reported issues . Your details will be known only to those people specifically involved in investigating your concerns and to the case management team to whom the investigators report. Any report that you make will not be sent to anyone that you have indicated may be implicated.

ANTI-BRIBERY AND CORRUPTION

Bribery and Corruption are always wrong and could damage our business reputation.

Our Principle

Compliance with anti-corruption and bribery laws is critical to protecting the DAMAC Digital reputation. Each of us is required to comply with anti-corruption and bribery laws. Failure to do so will result in criminal and civil liability both for individuals and for DAMAC Digital including but not limited to disciplinary action up to termination.

The actions of third parties who are government officials or who represent us or act on our behalf or in our name or for our benefit before public officials or government agencies or state controlled or state-owned companies can result in liability for you and DAMAC Digital.

DAMAC Digital can be held liable for the acts of third parties who act on its behalf if proper due diligence is not undertaken.

Prohibited Conduct

Bribery - We must never directly or indirectly (for instance, through agents or other third parties) authorize, offer, give or promise anything of value (including cash, gifts, donations, hospitality, or entertainment) to anyone to influence them in the performance of their duties, or to persuade them to perform their duties improperly. Likewise, we must not solicit or accept bribes or facilitation payments in any form. Your health and safety are paramount, and you should always take reasonable steps to keep yourself safe. However, health and safety payments must be immediately reported to your manager and DAMAC Digital Legal so that they can be accurately recorded and appropriate precautionary and safety measures can be implemented.

Exception: Such payments should only be made if no safe alternative exists

Facilitation Payments – these are payments made to low-level government officials or individuals to expedite routine actions or services they are already obligated to perform. Although facilitation payments may be considered legal in certain jurisdictions, DAMAC Digital strictly prohibits such payments as they undermine the principles of transparency, fairness, and ethical conduct. Employees are expected to refrain from engaging in facilitation payments and to report any requests or incidents related to such payments. This applies even where such payments are customary, prohibition to undertake facilitation payments aligns with international anti-bribery best practices.

We Never

- Take part in or tolerate any form of corrupt behaviour or any violation of anti-corruption laws;
- Hide or fail to properly or accurately record our activities and payments; or
- Offer, authorize, give, or promise anything of value to a third person, whether a private person or a public official (including employees and consultants of government-owned or controlled companies), to improperly influence the action or decision of that person to gain an improper advantage, or if it may cause reputational harm to DAMAC Digital.

We Always

- Obtain required pre-approvals before
- Offering, authorizing, giving, or promising anything of value to any third party (including any business gifts, donations, hospitality, per diems, and travels).
- Appointing, engaging or retaining the services of a third party to interact with others on our behalf (such as agents); or
- sponsoring or supporting an event or community project.
- Take great care in selecting the parties with whom we work, and, where warranted or prescribed by applicable DAMAC Digital procedures, conduct relevant checks and inquiries of our customers, suppliers and business partners;
- Check that fees paid for services from third parties, including agents, advisors and consultants, are for legitimate business purposes and are appropriate and consistent with the services provided;
- Understand and follow all applicable anti-corruption and bribery laws; and Promptly report any attempts to bribe us or requests for us to pay bribes and any other suspicions of bribery or corrupt behavior.

GIFTS, DONATIONS AND HOSPITALITY

All donations, gifts and hospitality must be reasonable, have a legitimate business purpose and must be pre-approved by DAMAC Digital.

Heightened Scrutiny for Government Officials

Some countries have very strict limitations on the value and nature of gifts and hospitality their government Officials can accept. Gifts and hospitality that are acceptable between private business partners may be unacceptable between a business and a public official. Employees of state-owned or controlled companies are treated as Governmental officials for these purposes. This includes individuals who hold positions in state-owned or state-controlled entities, international organizations, or any entity funded by public resources. You must have explicit permission to authorize, promise, offer or give gifts and hospitality to Government officials irrespective of the value of the gifts or hospitality. This not only includes traditional gifts, but also things like meals or political or charitable contributions. Equally, you must not offer gifts and hospitality to the spouses, family members or guests of a government official. You must not pay for nonbusiness travel and hospitality for any government official.

Our Principle

We only give or receive gifts or hospitality for business if it is reasonable and preapproved. We never offer or accept them if they could influence a business decision improperly. Bribes and 'excessive' hospitality are against the law and our Code of Conduct, Local customs do not override legal or policy obligations.

Giving and receiving gifts and hospitality is part of relationship building but common sense and good judgement must always be used.

Corporate charitable donations and sponsorships must be pre-approved as these could also give rise to similar issues of exerting improper influence.

Any individual gifts exceeding a value of US\$50 or equivalent local currency require prior approval from the individuals line manager. It is essential to seek this approval to ensure compliance with DAMAC Digital policies and applicable regulations. Value of the gifts will be assessed based on the quotation received or the current market price.

We Never

- Accept gifts or hospitality that could be perceived to affect our judgement or independence;
- Make, promise, or offer any gifts, hospitality, sponsorship, or charitable donation that could affect or appear to affect the judgement or independence of others; or
- Make or promise corporate political donations or contributions; or
- Accept or offer gifts and hospitality during the process of a competitive bid or tender exercise.

We Always

- Make sure to understand and follow DAMAC Digital Gifts and Hospitality Policy and the local laws and rules on gifts and hospitality that apply in the country where we do business.
- Obtain formal approval before promising, offering or making any gift, hospitality, sponsorship, or donation to any third party anywhere.
- Report any gift, hospitality, sponsorship, or charitable donation to our local manager or DAMAC Digital Legal.
- Limit any approved travel of third parties with whom we do or intend to do business strictly to the business purpose, including the organization, agenda, and duration of the business strip.
- Talk to your manager, operating company leaders, or DAMAC Digital Legal if we are unsure about any aspects of the Gifts and Hospitality Policy.

CUSTOMS, TRADE CONTROLS & SANCTIONS

We do not engage in any business with sanctioned persons, and we will always observe all import, export and trade controls laws and regulations.

Our Principle

In an increasingly interconnected global business environment, DAMAC Digital stands as a dynamic player with international operations that span across complex jurisdictions. As we expand our presence beyond borders, we recognize that our operations are subject to a multitude of challenges and opportunities. Among these, we confront risks related to trade controls and sanctions. Navigating the intricate web of laws and regulations governing trade across borders is crucial to maintaining our commitment to ethical business conduct and upholding our reputation as a responsible corporate entity. We must remain vigilant and informed and be proactive in anticipating the evolving risks and addressing changes in regulations upfront. This way, not only do we mitigate risks but also create a foundation for sustainable growth and positive impact in the markets we serve.

We Never

- do business with sanctioned individuals or companies or operate in sanctioned countries or territories, even if the commercial opportunity appears significant. This underscores the importance of compliance over profit.
- conceal or misrepresent the value, origin, and description of our goods.
- assume that our products, services and technologies are not subject to export controls or that they are subject to the same customs regulations and export controls as the ones we're familiar with.
- partner with third parties without conducting proper due diligence or ignore their background and activities that may expose us to violations.
- export controlled items without obtaining the necessary licenses, even if we believe they are innocuous.
- ignore the red flags or unusual circumstances that might indicate potential export control violations.
- avoid reporting violations as timely reporting can prevent serious consequences.

We Always

- comply with all applicable international, national, and regional trade controls and sanctions laws and regulations. This includes export controls, import regulations, embargoes, and restrictions on the trade of specific goods and technologies.
- conduct periodic assessments of our trade-related activities to identify and evaluate potential risks and vulnerabilities associated with trade controls and sanctions.
- accurately classify our products according to export control lists and regulations of relevant jurisdictions.
- conduct due diligence to ensure that our products are not destined for prohibited end-uses or end-users, particularly those engaged in activities that pose a risk to global security.
- accurately assess the value and classification of imported goods to ensure compliance with import regulations.
- provide complete and accurate information on customs declarations, including the value, origin, and description of imported goods.
- rigorously screen customers, suppliers, partners, and transactions using DAMAC Digital approved screening tool against consolidated sanctions lists to ensure they are not connected to entities or individuals subject to sanctions or embargoes.
- comply with country-specific sanctions and embargoes, refraining from conducting business with entities in prohibited jurisdictions.
- provide training to employees involved in international trade operations to ensure they understand trade controls and sanctions regulations, recognize red flags, and respond appropriately to potential risks.
- communicate our commitment to trade controls compliance to our suppliers, partners, and contractors and encourage them to adopt similar standards.
- encourage our employees to report any concerns related to potential violations of trade controls and sanctions regulations through established internal channels.
- conduct periodic internal audits and assessments to monitor the effectiveness of our trade controls program.
- endeavour to continuously improve our trade controls efforts.

This policy demonstrates DAMAC Digital unwavering commitment to responsible international trade practices. By adhering to this policy, not only do we safeguard our operations but also contribute to global security, ethical trade, and sustainable business growth. Failure to comply may result in disciplinary action and could expose the company and individuals to criminal and civil liability.

ANTI-MONEY LAUNDERING

Knowing who we do business with is paramount to protecting our reputation and creating sustainable growth and success. We do not want to associate DAMAC Digital with customers, suppliers, contractors, agents, and business partners who would bring disrepute to DAMAC Digital and expose us to legal liability because of their illegal activities. This policy reaffirms DAMAC Digital contribution and commitment to the global fight against money laundering and the financing of terrorism and a secure and trustworthy financial environment.

Our Principle

This policy outlines our measures to ensure that our company remains vigilant against these illegal activities and contributes to maintaining the integrity of the global financial system.

We Never

- disregard AML regulations or assuming that they do not apply to our business operations.
- overlook risk assessment and apply the same level of due diligence to all customers, as higher- risk customers require more scrutiny.
- skip proper customer identification processes, even if a customer seems reputable or well- known.
- ignore potential red flags in transactions or customer behaviour that may indicate money laundering or terrorist financing.
- neglect enhanced due diligence for high-risk customers or transactions, including politically exposed persons, even if they involve valued clients.
- delay reporting suspicious transactions to the relevant authorities as required by law.
- solely rely on automated systems without human oversight, even as we use technology to assist in AML monitoring.
- underestimate the importance of thorough AML training for employees involved in financial operations.

We Always

- comply with all applicable international, national, and regional AML laws, regulations, and standards to prevent money laundering and terrorist financing.
- Stay updated on changes in AML regulations and best practices and adapt our procedures accordingly . Compliance and Legal Team is responsible for monitoring legal changes and updating internal protocols.
- regularly assess the risk of our operations being used for money laundering or terrorist financing.
- Tailor our AML procedures based on risk assessments, focusing more resources on higher- risk areas.
- perform robust customer identification procedures.
- apply enhanced due diligence measures for high- risk customers, transactions, and business relationships.
- maintain up-to-date customer profiles that include relevant information about the customer's business activities, ownership structure, and sources of funds.
- Conduct a risk-based ongoing transaction monitoring and periodic client file reviews to detect and report any unusual or suspicious activity that could indicate money laundering or terrorist financing .
- establish tools and channels for employees to report any suspicions or concerns related to potential money laundering or terrorist financing activities.
- As required by applicable laws in which DAMAC Digital operates, promptly report any internal suspicious transactions first to Compliance.
- provide regular training to employees involved in financial operations to ensure they understand AML requirements, recognize red flags, and know how to respond to suspicious activity.
- maintain accurate records of customer information, transactions, and due diligence documentation as required by law.
- continually assess our AML risk exposure and adjust our procedures and controls accordingly.
- commit to continuously improve our AML efforts.
- regularly assess the risk of our operations being used for money laundering or terrorist financing activities.

CONFLICTS OF INTEREST AND PERSONAL RELATIONSHIPS IN THE WORKPLACE

Could it put you in an awkward position or create the perception of conflicts of interest? Avoid doing it or seek advice quickly to address or disclose the situation.

Our Principle

We avoid situations that could give rise to actual, potential or perceived conflicts between our personal interests and DAMAC Digital interests. If such situations do occur, we always disclose these in writing to our manager and address openly the consequences of our involvement in order to mitigate any actual, potential or perceived conflicts. Conflicts of interest arise if we, members of our families or our friends, have personal business interests, financial interests, or other jobs which do or might conflict with DAMAC Digital business, and we find ourselves compromised. Examples include but not limited to (i) procurement (ii) hiring (iii) business deals (iv) gifts etc.

- **An actual conflict of interest exists when an individual's personal interests directly and negatively affect their professional duties or decisions.**
- **A potential conflict of interest is a situation where a person's personal interests or relationships could, but haven't yet, influence their professional decisions or actions, creating a risk of bias**
- **A perceived conflict of interest exists when it appears to others that an individual's personal interests could improperly influence their professional duties, even if no actual conflict exists**

Relationships – Relationships, including personal relationships with other DAMAC Digital employees and employees of suppliers, customers, and competitors, which make it difficult to fulfill our work responsibilities or which give rise to a perceived conflict must be avoided.

Employment outside DAMAC Digital – You may not be employed by another employer without DAMAC Digital's approval. In addition, employees must not be employed or have any personal business commitments (such as directorships or consultancy roles) in any businesses which are the same as or similar to the businesses operated by DAMAC Digital.

Financial interests – You must not have financial interests that might conflict with the interests of the DAMAC Digital or could appear to others to conflict with the interests of DAMAC Digital, unless you have obtained written approval beforehand from the relevant DAMAC Digital authority and have conformed to the relevant requirements set out by DAMAC Digital.

We Never

- hold another job or personal commitments in the same trade or industry as DAMAC Digital company while we are employed by DAMAC Digital;
- Take advantage of our knowledge, contacts, and position within DAMAC Digital to make personal gain beyond our employment rewards and benefits, or to benefit a personal relation, directly or indirectly; or
- Allow any familial or close personal relationships (which could give rise to a conflict) in the workplace or related business to go undisclosed.

We Always

- Avoid involvement in any contracts or business dealings between DAMAC Digital and a family member or friend or a business they own or work with or are employed by, or by not seeking to employ any family member or friend.
- Inform our manager or supervisor of any such relevant personal relations in writing and we do not take any part in the related decision-making process.
- Obtain written approval from DAMAC Digital to serve as an officer or director of another business.
- Are diligent with our own personal investments or business interests to ensure that there is no conflict or perception of potential conflict with the interests of DAMAC Digital or its customers or suppliers.
- Disclose and discuss with our manager, HR or Legal if we suspect, perceive or are not sure about any possible conflict of interest in our business or in any personal relationship in the workplace.
- Accept and cooperate with agreed solutions to stop or prevent conflicts from occurring.

FRAUD, DECEPTION AND DISHONESTY

Any fraud or dishonesty, irrespective of size, could harm our reputation.

Our Principle

We act with integrity and engage in business honestly. We do our utmost to protect DAMAC Digital from fraud or dishonesty at all times.

Fraud typically means deceiving others, acting dishonestly or abusing your position to gain some advantage. Fraud is usually carried out for profit or to wrongfully obtain money, goods or services. Subject to applicable laws and regulations where DAMAC Digital operates, fraudulent activities may be deemed as a criminal offence that could lead to imprisonment.

We Never

- Overstate expenses or make expenses claims that were not incurred for DAMAC Digital business;
- Approve expenses or charge them to a customer if we believe they are false or not related to DAMAC Digital's business;
- Ignore activities that we think might involve fraud, theft, bribery, money laundering, or deception; or
- Use DAMAC Digital's money or resources for something improper or not legitimately connected to our business.

We Always

- promptly report suspected fraud, theft, or dishonest behaviour through the appropriate internal channels (e.g., to your manager, Compliance, Legal, or via the Speak-Up hotline)
- Act honestly, fairly, and openly;
- Make sure that the company's financial books and Records are accurate, truthful, and complete;
- Make sure that documents, including invoices and receipts, are accurate, complete, issued by the proper legal entity, and comply with contract terms; and
- Check and challenge anything that does not look or feel right, employees are encouraged to report suspected fraud through internal reporting channels

EQUALITY, INCLUSION AND DIVERSITY

We believe in providing equality of opportunity.

Our Principle

We are committed to recruiting and promoting our employees fairly and without discrimination. We actively recognize diversity by building a culture of equal opportunity, mutual respect, and collaboration. Fair employment policy: DAMAC Digital does not take any decision and is not influenced by any factors that do not have a direct bearing on the ability of the individual to perform the job.

Workplace diversity: Means having an inclusive, respectful environment that accepts each individual's differences, embraces their strengths, skills, and attributes and provides opportunities for all employees to achieve their full potential.

Inclusion: Everyone has something unique to contribute and we believe that active inclusion promotes lateral and original thinking and is the best way to promote and leverage skills and talents, and to achieve superior organizational performance.

We Never

- Provide development opportunities or promote employees other than on merit and based on work performance and potential.
- Discriminate or base our decisions, including hiring, promotion, evaluation and termination, on the basis of a person's nationality, ethnicity, race, religion, gender, national origin, disability, actual or perceived sexual orientation, gender identification, employment status, political affiliation, or any such personal characteristics.

We Always

- Hire the best person for the role and promote based on merit.
- Give people opportunities on an equal basis.
- Respect the employment laws in the countries where we operate and comply with any national or local regulations.
- Act and support others to maintain a work environment where all are respected and which is free of discrimination, harassment, and bullying.
- Remain open and flexible to different needs and perspectives in the workplace.

DAMAC Digital embraces diversity as a core value within the organization. We are proud of our globally diverse workforce, which reflects a wide range of nationalities, cultures, and experiences. . We believe that diversity brings unique perspectives, experiences, and talents, fostering innovation and enriching our workplace. We are committed to creating an inclusive environment where all employees are treated with respect, dignity, and fairness, regardless of their nationality, ethnicity, race, religion, gender, or any other characteristic. By embracing diversity, we cultivate a vibrant and collaborative culture that empowers our employees and strengthens our organization as a whole

HARASSMENT, BULLYING, GOSSIP, RUMOUR AND DISCRIMINATION

At DAMAC Digital there is Zero tolerance for workplace harassment, bullying, and victimisation.

Our Principle

We treat our employees, contractors, consultants, customers and third parties with whom we interact or do business with respect and dignity and ensure that others do the same. We do not allow behavior or actions that make those who work for or with us feel inferior, humiliated, upset, or threatened.

Harassment means behavior or actions towards an individual or group that makes them feel intimidated, humiliated, unwelcome, or threatened.

Bullying means saying or doing something offensive, abusive, intimidating, or threatening that makes another individual feel upset, threatened, humiliated, or vulnerable, or undermines their self-confidence. Discrimination means treating a certain person or group differently, based on factors such as race, sex, age, gender, religion, caste, color, national origin, disability, actual or perceived sexual orientation, gender identification, employment status, or political affiliation.

We do not entertain gossip at work and always refrain from spreading rumors or any false information that may lead to unknown consequences.

Every DAMAC Digital employee is responsible for creating a work environment free of discrimination and harassment. This policy applies to all employees, consultants, contractors, and third parties, including interactions during work-related events, travel, and on digital platforms. Every Head of Department is responsible for making sure the members of his or her department fully understand and adhere to this policy.

We Never

- Harass, bully, or discriminate against others.
- Make inappropriate jokes or comments or participate in gossip or rumors.
- Tolerate any physical violence in the workplace.
- Threaten a colleague with physical violence.
- Act in a way which is unacceptable or inappropriate or that could cause offence to others or bring the company into disrepute.

We Always

- Speak out against harassment, bullying, and discrimination.
- Promptly report such acts through the appropriate internal channels (e.g., to your manager, Compliance, Legal, or via the Speak-Up hotline)
- Ensure anti-retaliation protection is available for complainants and witnesses
- Support others who challenge or report this kind of behavior.

HUMAN RIGHTS PRINCIPLES

We respect human rights.

Our Principle

We respect human rights of all those working for or with us, and of the people in the communities in which we operate. We will not exploit anyone, wherever in the world we are working. We will not do business with companies, organizations, or individuals that we believe are not working to comparable generally accepted human rights standards.

We Never

- Use any form of child Labor, modern slavery, servitude, or forced Labor in our operating companies, nor to the best of our knowledge in our supply chain.
- Tolerate excessive working hours being worked in any of our operating companies other than on an exceptional or emergency basis.
- Work with other companies that we know or suspect are not respecting our human rights principles.
- Negotiate with or try to persuade our employees to adopt working terms or conditions that do not conform to the UN human rights principles.

We Always

- Make the health, safety, and wellbeing of our employees and others a top priority.
- Comply with national laws on wages and working conditions where we operate.
- Comply with the constitution of the country where we operate, applicable International Human Rights Treaties and any DAMAC Digital policies covering the rights of those who work for or with us or are otherwise affected by our action.
- Encourage employees or third parties to raise human rights concerns, and will be protected from retaliation.
- Promptly report such acts through the appropriate internal channels (e.g., to your manager, Compliance, Legal, or via the Speak-Up hotline).
- Ensure anti-retaliation protection is available for employees or third parties.

INTEGRITY WHILE DEALING INTERNALLY AS WELL AS EXTERNALLY

We must all work to the same highest standards, We expect all agents to act ethically in dealing with our customers and competitors on our behalf.

Our Principle

DAMAC Digital is an international group with a strong reputation. We will not permit agents appointed by DAMAC Digital to risk damage to our ethical reputation by engaging in unethical behavior or corrupt practices. Thus, agents appointed by DAMAC Digital must comply with the DAMAC Digital Code of Conduct (COC). If agents do not follow our COC, we will not work with them. An agent is anyone or any entity that represents DAMAC Digital in any proposed or actual dealing or activity in front of public officials, state owned or controlled companies, or private parties. Agents include sales representatives, distributors, agents, promoters, sponsors, consultants, and brokers. Agents also include joint-venture partners

Relationships with third parties are critical to our success and we will work with all of them to try to ensure that they adopt equivalent standards to this COC.

We Never

- Select a new partner without investigating how they carry out their business and being satisfied that they do so in a manner which is consistent with DAMAC Digital's ethical standards and this COC.
- Ignore behavior that is inconsistent with the requirements of this COC.
- Appoint an agent without careful due diligence and internal approval.
- Allow agents to authorize, promise, offer, or pay bribes to win work for DAMAC Digital.
- Help agents to avoid paying tax on their remuneration.

We Always

- Are honest and transparent in our dealings.
- Look to build relationships which will last.
- Treat our stakeholders with respect.
- perform checks and a due diligence on all vendors/third parties we intend to do business with before we appoint them or engage in any business relationship.
- Have a signed written agreement with all vendors / third parties acting on our behalf before the they carry out any work for us (providing for the confirmation that they will act in accordance with the DAMAC Digital COC);
- Get valid and itemized invoices from the vendor/ third party before effecting payments
- Make sure we fully understand what the vendor/ third party is doing on our behalf.
- Satisfy ourselves that the vendor/ third party way of working does not conflict with our ethical standards.
- Inform the vendor/ third party clearly that bribery and corruption are not tolerated by DAMAC Digital.
- Accurately and properly record in our books any payments or reimbursements made to vendor/ third party without any recharacterization or dissimulation of the nature and purpose of the payment or reimbursement.
- Terminate agreements with vendors/ third parties who break our rules.

We always compete fairly in business – it is the only way to act

Our Principle

We act in a way that ensures open and fair competition and we do not obtain an unfair competitive advantage. Competition (antitrust) law protects free enterprise and prohibits behavior that limits trade or that restricts fair competition. These laws combat illegal practices like price-fixing, market-sharing, or bid-rigging conspiracies, or behaviors that aim to achieve or maintain a monopoly. Anti-competitive practices are unacceptable and will damage DAMAC Digital's business and reputation.

Competition/antitrust laws – We make sure that we have knowledge of and respect the relevant competition and antitrust laws in the countries in which we operate. Where no such laws directly apply, we nonetheless seek to operate in a manner which is consistent with generally accepted international competition law principles. Competition laws are different in each country. Generally, they restrict anti-competitive market practices such as collusion.

We Never

- Assume that something is right just because our competitors are doing it – we establish the facts for ourselves.
- Get involved in any conversations, meetings, e-mail exchanges, or other communications with competitors that might be or be seen as anti-competitive.
- Engage in antitrust activity or do anything that might give the impression that the DAMAC Digital was taking part in anticompetitive behavior, including price fixing and market allocation schemes.
- Make any decisions on DAMAC Digital's pricing, production, customers, and markets in collaboration with any other party. Any such decisions must be made by DAMAC Digital alone.
- Discuss with competitors which suppliers, customers, or contractors with whom DAMAC Digital deals or will deal or which markets DAMAC Digital intends to conduct business in or on what terms DAMAC Digital will deal.

We Always

- Use legitimate means of obtaining competitive information.
- Respect the confidential information and intellectual property rights of our competitors and other third parties.
- Take great care in dealing with competitors: any agreement with them could be anti-competitive, including agreements or behavior that are not written down.
- Leave industry meetings if competitively sensitive issues arise and immediately report the matter to DAMAC Digital Legal.
- Tell DAMAC Digital Legal if we know of or suspect any potentially anti-competitive practices or if we are uncertain whether practices are legal or not.

Avoiding Situations

Expos, trade association meetings, and other business gatherings are useful. However, when competitors meet in any format, there are risks that competition laws maybe inadvertently broken even if in seemingly harmless ways. To avoid violating anti competition laws, do not talk with competitors about inappropriate or commercially sensitive topics such as pricing, marketing plans or strategies, planned business acquisitions, market share, market expansion plans or strategies, non-public market data or information etc. Specifically, bid-rigging, tender cover pricing, and market/customer allocation are offences that DAMAC Digital does not support. If a conversation becomes inappropriate, firmly and clearly tell those present that you will not participate and leave. You must report it to DAMAC Digital Legal immediately. Violating competition laws can result in severe civil and criminal penalties, including fines, disgorgement of profits, and, for individuals, imprisonment.

We use company information systems responsibly – this includes any personal use.

Our Principle

DAMAC Digital seeks to maintain secure and effective information systems for its businesses to use. We all have individual responsibilities for ensuring that we use our IT systems and equipment appropriately and maintain the security of the data within them. We must also remember that e-mails to external parties have the same effect in law as other forms of written communication. We will not send e-mails or other electronic communication which make representations, contractual commitments or any other form of statement concerning DAMAC Digital or one of its businesses unless we are authorized to do so. We may occasionally use DAMAC Digital information systems to send e-mail and access the internet for personal purposes, but we may not do so if we are accessing or distributing material which is inappropriate or illegal or if we are putting the security of DAMAC Digital IT systems or Equipment at risk. This personal usage is not private or confidential, and DAMAC Digital may monitor e-mail and internet usage to ensure compliance with applicable policies. Company information systems are software applications, computer and communications equipment provided for the use of DAMAC Digital employees.

This includes:

- Access to company business applications and the data stored and processed by them.
- Desktop, laptop and mobile/handheld computers and communication equipment.
- Server computers and network equipment, including internet access.
- Portable storage devices such as USB memory sticks, removable hard-drives, USB drives and CDs/DVDs.
- Video and audio communications equipment including desktop and mobile phones, video- conferencing equipment and personal web- cams.
- Office technology such as printers, scanners and fax machines.
- Data stored within and communicated by these systems including databases, electronic documents, e-mails and voicemails.
- All software applications and systems.

We Never

- Misrepresent DAMAC Digital online.
- Sign up to websites with DAMAC Digital official email address.
- Use Instant messaging tool other than IT approved services.
- Send or forward anything that
 - Contains statements, opinions, comments or transmit documents, text, videos or pictures which are likely to be illegal, pornographic, racist, sexist, discriminatory, offensive or otherwise contrary to the values of DAMAC Digital as remarked by this Code of Conduct;
 - May be defamatory (about an individual or organization); or
 - May violate intellectual property laws or another person's copyrights or other intellectual property rights.
- Visit social networking sites whilst at work unless for legitimate business purposes (e.g. Yammer);.
- Make excessive personal use of company telephones or computers.
- Rely on company equipment to maintain the master copy of any personal data.
- Forward business e-mail to a private address, enable automatic forward rules to person, external email accounts as they are prohibited.
- Allow unassigned user to use your computer while logged in.
- Visit inappropriate or illegal websites (e.g. sites containing pornographic, violent or racist material) using company information systems.
- Use DAMAC Digital computer systems to access, create, or distribute any material that is offensive or illegal, or has been obtained illegally.
- Install unauthorized or unlicensed software on company computers.
- Use external data storage devices (e.g. USB memory sticks, CD/DVD writers) unless they have been approved by the company IT department and their security is ensured. We must take care not to be careless with or lose these devices.
- Take copies of information stored on DAMAC Digital systems for our own personal use or for the use of others.
- Take photographs, videos, or sound recordings in any DAMAC Digital facility, or facilities belonging to customers or suppliers, without first obtaining permission to do so.

USE OF COMPANY SYSTEMS AND INFORMATION

We Always

- Comply with DAMAC Digital IT security policies, including the use of passwords, anti-virus software, and making regular back-ups.
- Keep ourselves aware that the computer assigned to us is the property of DAMAC Digital and has been prepared by the DAMAC Digital IT for use on DAMAC Digital network.
- Employees working remotely must ensure company data is encrypted, equipment is secured, and usage complies with all DAMAC Digital policies.
- Keep company IT equipment and assets, especially laptops, badges and any external data storage containing company information, as secure as possible.
- Report all suspicious emails with URLs and attachments to ITSecurity@damacgroup.com
- Follow the social media guidelines in respect of our personal and, where appropriate, business use of social networking sites.
- Lock our workstations (Win + L Key) when we are away.
- Respect copyright and licensing agreements while using DAMAC Digital IT systems.
- Ensure no confidential information in the form of paper or media is left unattended in the workspace.
- Keep the secure doors locked and not allow tailgating.
- Ensure the printing of confidential information is supervised, and all printouts removed immediately.
- Safeguard laptops or equipment's with appropriate protection.
- Remember that the DAMAC Digital may, subject to local governing laws, monitor the usage of its computer and communications systems, and so there should be no expectation of privacy with respect to data or information stored on or processed through any DAMAC Digital laptop, computer, servers, network or other IT system or equipment or device, whether such information or data is personal and not work related and whether the use of the DAMAC Digital IT system or equipment or device is for personal or non-work purposes.
- Regard information as a Company asset and treat as confidential all information to which we have access through DAMAC Digital systems.
- Use IT equipment safely and in accordance with local laws.
- Endeavour to make sure all information in DAMAC Digital systems is up-to-date and accurate for the benefit of the Company and or colleagues.
- Report any equipment or data loss, or any suspected security breach, to our IT department as soon as it is known or suspected

SOCIAL MEDIA GUIDELINES

DAMAC Digital understands the importance and risks of social media and we embrace it to grow our business.

Our Principle and Guidelines

At DAMAC Digital, we recognize the importance of social media in today's interconnected world. This policy outlines the guidelines for employees and partners when using social media platforms in relation to our company. It is important to remember that your online presence reflects not only your personal views but also our company's values and reputation.

- Approach the online world in the same way you do the physical one: using sound judgement and common sense.
 - Maintain a professional tone and demeanor while using social media platforms.
 - Do not engage in disrespectful, offensive, discriminatory, or harassing behavior.
 - Ensure your online contributions are meaningful, purposeful, and professional.
 - Be accurate, truthful and, when talking about DAMAC Digital or the industries in which we work, disclose your affiliation and state that the views expressed are your own.
 - To avoid confusion between official and personal accounts, your personal accounts or username should never include the term 'DAMAC Digital' or any of our brand, product or divisional names (e.g. avoid 'twitter.com/ Sarah From DAMAC').
 - Do not engage in fake accounts or impersonation.
 - Do not speak on behalf of the company unless authorized to do so.
 - If you identify yourself as an employee, make it clear that your views are your own and not those of the company.
 - Whatever you post online can be viewed by anyone, even if it is later deleted or you have privacy controls in place.
 - Do not disclose any proprietary information, affiliations, trade secrets, ideas, or intellectual property of DAMAC Digital, its customers, suppliers, contractors, or other business partners, or share content which is sensitive, private, or confidential.
 - Do not post photos featuring our premises or products which have not yet been publicly released, are damaged, or are in trial form. If you wish to post photos of customers' or suppliers' facilities ensure that you have their clear approval before doing so. If you are unsure, please discuss the matter with your manager.
- Respect your audience. Remember that anything you say or publish gives an impression of how we work and that things can be misconceived or misinterpreted, particularly across different languages and cultures.
 - We know you are passionate about DAMAC Digital and want to help protect our reputation. However, we carefully manage all official communications online and offline through our communications team.
 - If you see something online which you feel needs an official response, please report it to your Manager, Compliance, HR or Legal. Finally, follow the law, our COC, and the terms and conditions of the social networking site you are using.
 - Respect copyright and intellectual property rights when sharing content.
 - Do not use our company's logos, trademarks, or copyrighted material without permission.
 - Respect the privacy of colleagues and avoid tagging them without their consent.
 - Always provide proper credit for content you share that is not your own.
 - Do not use copyrighted images, videos, or other materials without appropriate permissions.
 - Be cautious of phishing attempts and malicious links.
 - Disclose any affiliations, sponsorships, or paid partnerships when promoting our products or services.
 - If you encounter negative comments about DAMAC Digital, refer them to the appropriate department for resolution.
 - Report any suspicious or unauthorized activity to the IT department.

FINANCIAL RECORDS, CONTROLS AND REPORTING

Our financial records must record our business activities accurately.

Our Principle

We play our part in making sure that the books, records, and financial information of DAMAC Digital companies are complete, truthful, fair, on-time and accurate. This includes supplying accurate information for sales invoices, ensuring that new employee tax information is submitted promptly, and making sure that our time sheets or expenses forms are correct. We all have a responsibility for preventing and looking out for possible fraud or money laundering. We are responsible for following DAMAC Digital system of financial controls, to ensure the integrity of our businesses and financial records. Examples include following individual company procedures for checking and authorizing purchase invoices and counter-signatures on payment instructions. Finance staff and operating company management teams must also understand their responsibilities in DAMAC Digital relevant finance manuals and must follow the guidelines contained within those manuals.

We Never

- Never overlook legal requirements and compliance obligations in our financial policy.
- omit the establishment of internal controls and mechanisms to prevent financial misconduct and fraud.
- Avoid assigning financial responsibilities to a single individual without oversight, which can lead to vulnerabilities.
- Refrain from resisting necessary updates and revisions to the financial policy to keep it relevant and effective.
- Deliberately record false or misleading information or give wrong financial data to others.
- overstate or falsely report revenue or engage in bookkeeping shenanigans such as illegal cost deferrals and the like.
- Conceal or fail to report any business transaction.

We Always

- Ensure that our financial policy adheres to relevant laws, regulations, and industry standards.
- Keep detailed and accurate financial records to ensure transparency, accountability, and compliance.
- Implement segregation of duties and separate financial responsibilities to prevent conflicts of interest and fraud, enhancing internal controls.
- Continuously monitor financial activities and regularly evaluate the effectiveness of our financial policy.
- Give accurate information to the Finance function as soon as we can.
- Record and report financial information in line with the laws of the country where we operate.
- Follow DAMAC Digital system of financial controls.
- Respect the limits of our authority (e.g. only approve invoices for payment within our authority limits).
- Document transactions between legal entities of DAMAC Digital in approved inter-company agreements.
- Look out for possible fraud or money laundering report any suspicions to senior management.
- Maintaining data privacy requirements about supplier and customer transaction details both from Internal and External parties as necessary, all-in compliance with applicable laws and regulations and international best practices.
- Train employees on the financial policy to ensure they understand their roles, responsibilities, and compliance requirements.
- Follow industry best practices and work towards continuous improvement in keeping financial records, controls and reporting packages.
- Be open to revising and updating the financial policy to accommodate changes in laws, regulations, and business needs.

CONFIDENTIAL INFORMATION

We keep confidential information confidential.

Our Principle

We will keep confidential information belonging to DAMAC Digital or to customers or other third parties safe and only share it on a 'need to know' basis. We will only disclose confidential information to third parties if we are properly authorized to do so and on a confidential basis.

Confidential information means confidential or trade information belonging to DAMAC Digital or disclosed to DAMAC Digital Group Companies under obligations of confidentiality.

This includes, for example:

- Financial information, business strategies or plans, business practices, systems and processes, and other similar information which is not in the public domain.
- Product specifications, pricing policies, sales, or marketing information.
- Customer and supplier contracts.
- Employee information.
- Technical information.
- Intellectual property, including inventions, innovations and trade secrets.

During the normal course of business, employees may gain possession of, or access to, information which is confidential to DAMAC Digital. We are careful to deal with confidential information in such a way that we protect the DAMAC Digital's interest.

NOTE: There are special rules regarding processing and safeguarding customer information and personal information which can be found under DAMAC Digital Data Protection & Privacy Policy.

We Never

- Discuss confidential information in public or where we could be overheard.
- Leave confidential information in an insecure or public place.
- Share confidential information from or about a previous employer unless we are permitted to do so by our previous employer.
- Copy documents or materials containing confidential information unless we are authorized to do so.

We Always

- Make sure that, if we are legitimately disclosing Confidential information outside DAMAC Digital, we do so exclusively with a confidentiality agreement in force.
- Make sure that customers, suppliers, and other third parties protect our confidential information.
- Ask DAMAC Digital Legal if we are in doubt.

COMPANY COMMUNICATIONS AND DISCLOSURES

How we communicate is very important in building trust.

Our Principle

We communicate any information about the DAMAC Digital truthfully and carefully, making sure that our messages are authorized if necessary. Any communications to national media need to be authorized by DAMAC Digital Head of Communications and Public Affairs or the DAMAC Digital Company Secretary because of their significance and potential impact for investors . We think carefully when we are communicating about DAMAC Digital in electronic form, such as external e-mails, blogs, websites, and social networks.

Company communications mean any external messages from anyone in DAMAC Digital or anyone we authorize to communicate on our behalf about DAMAC Digital or its business. This includes press releases, communications with journalists or other news media, advertisements, content published on social networks, trade promotional material, and any other public statements.

Disclosures mean factual statements or forecasts communicated to shareholders, regulators, securities exchanges, the media, or other third parties.

Media means newspapers (national and local), trade press, television, radio, websites, and Social networks. We can communicate with technical trade media and with local media on matters of local interest if it has been authorized by Marketing and Communications. However, we must ensure that there is no DAMAC Digital Group or wider dimension which could be of interest to national media, and in particular, online electronic media. If in doubt, we will get advice from DAMAC Digital Head of Communications and Public Affairs or our Divisional Managing Director or the Group Company Secretary.

We Never

- Respond to journalists, the media, regulators, government agencies, or other external agencies without getting permission to do so.
- Write or say anything in public about DAMAC Digital that is untrue, inaccurate, misleading, or could harm its reputation.
- Do anything to harm DAMAC Digital's reputation in social networking sites, blogs, chat- rooms, and other electronic communications.
- Communicate our personal views in a way that they could be interpreted as being DAMAC Digital's views.

We Always

- Make sure that all company communications and disclosures have been authorized by the correct person in the Group Communications team.
- Remember, when we are communicating, that any e-mails, texts, tweets or anything else we write might appear in newspapers or have to be explained in court.
- Think carefully before forwarding e-mails either internally or externally. Something intended as a joke between colleagues can look very bad printed in a newspaper.
- Take extra care about what we say at meetings or other public events when we could be thought to be speaking on behalf of DAMAC Digital.

PERSONAL INFORMATION & PRIVACY

We keep personal information private regardless of its format

Our Principle

We think carefully about issues relating to personal information, making sure that we protect individual privacy and follow the data protection and data privacy laws in the countries where we operate or process personal data. We will only allow employees with the correct authorization and valid legal or business reasons to access any personal information. Where such employees access personal information, they will only use it for proper and legitimate business purposes. We will only hold personal information for the time we need to carry out the specific legal or business task or as required by law. We will not transfer personal information to other employees or countries if it is not allowed by local law.

Personal information means any data or information or combination thereof through which an individual can be personally identified. This includes information such as names, addresses, dates of birth, national insurance or social security numbers, job titles, medical data, IP address, email, or photographs of any persons.

Data protection and data privacy laws means laws as applicable to DAMAC Digital entities depending on their location.

We Never

- Collect data that is irrelevant to our business operations or the services we provide.
- Disregard the rights of individuals regarding their personal data, including the right to access, rectify, and delete their information.
- Share personal data with third parties without explicit consent from the data subjects where required by law and by best or ethical practices.
- Use insecure communication channels or platforms that do not meet industry-standard security requirements.
- Retain personal data longer than necessary for the purpose it was collected.
- Ignore or neglect the reporting of data breaches.
- Sell personal data without obtaining specific consent from individuals to do so.
- Use personal data for purposes beyond what individuals have consented to or repurpose the use of data for which we had obtained consent without seeking new consent.
- Check potential employee references without getting their consent first.
- Overlook the importance of training your employees on data privacy practices and protocols.
- Engage in spamming or unsolicited marketing communications and will always observe opt-in opt-out legal requirements.
- Assume we are automatically compliant with data protection laws.

PERSONAL INFORMATION & PRIVACY

We Always

- Collect, store, modify, delete, use, share, and otherwise process personal data in strict compliance with data protection and data privacy laws.
- Collect, store, modify, delete, use, share, and otherwise process personal data only after obtaining clear and informed consent from individuals, and provide them with transparent information about the purpose, scope, and duration of data usage.
- Collect only the data necessary for the intended purpose and avoid excessive or unnecessary data collection and retention.
- Upholding data subject rights (e.g. access, correction, deletion, etc) under applicable laws.
- Consider the privacy impact when we develop new products and processes.
- Protect personal information, keeping it confidential and secure.
- Obtain any permissions we legally need for the use of personal information and record those permissions.
- Use personal information in ways that individuals would reasonably expect.
- Take particular care with sensitive personal information, such as medical information, as explicit consent may be required for processing or disclosing such information.
- Tell our manager if we lose any personal information (e.g. employee details stored on a laptop).
- Employ robust security measures, such as encryption, firewalls, and access controls, to safeguard personal and sensitive data from unauthorized access or breaches.
- Maintain up-to-date privacy policies that outline how we collect, process, and store data, and make these policies easily accessible to users on our website, applications, or platforms.
- Whenever possible, anonymize or pseudonymize data to minimize the risk of personal identification while still allowing for analysis.
- Train our staff about data privacy best practices and this policy and its processes and procedures.
- Ensure that partners with whom we share personal data also adhere to strong data privacy practices and comply with applicable regulations.
- Allow individuals to access, correct, or delete their personal data upon request, in accordance with data protection laws.
- Develop and maintain an incident response plan to address data breaches promptly and effectively, including notifying affected parties and relevant authorities.
- Conduct periodic audits of our data practices to identify vulnerabilities, ensure compliance, and improve overall data privacy measures.
- Establish data retention policies and adhere to them.

HEALTH & SAFETY

Our vision is a zero-harm workplace for people and the environment. Nothing is more important than the health and safety of our people and others affected by or engaged in our activities. We believe that everyone has the right to go home every day to their family safe and healthy. If a job, works, procedure or project cannot be done safely and securely, we will not do it.

Our Principle

At DAMAC Digital we believe that all injuries and occupational illnesses are preventable. There is no business objective that will take priority over health and safety. There is no task that is so important or urgent that it cannot be done safely. We believe safety is everyone's responsibility and we operate sustainably and minimize our environmental impact. DAMAC Digital prioritizes continuous reinforcement of zero harm to people and the environment, a deeply embedded safety culture where employees act safely at and away from work, and delivery of our safety culture through visible and proactive 'felt leadership' at all levels.

We Never

- Ignore legal and other safety and environmental compliance requirements whether those imposed by regulations or deriving from best practices and industry standards.
- Engage contractors that do not follow and apply best industry standards in relation to the safety and health of their employees and subcontractors.
- Prioritize speed or cost over safety, as this can lead to accidents and long-term repercussions.
- Assume that risks and hazards are obvious and need not be flagged and managed proactively and effectively.
- Never allow employees and contractors to work in hazardous areas without appropriate PPE, which can lead to serious injuries.
- Discourage incident reporting, as this impedes the identification and mitigation of potential hazards.
- create an environment where employees are hesitant to voice safety concerns or suggestions.
- Neglect routine inspections.

We Always

- Make safety the top priority in all activities, ensuring the well-being of employees, contractors, customers, and visitors.
- Place HSE at the heart of a whole life cycle approach to product stewardship.
- Adhere to all relevant health, safety regulations and standards to maintain compliance.
- Regularly assess all potential risks and hazards proactively and eliminate or, if not possible, take to identify areas that require preventive measures and manage the risk to as low as reasonably practicable.
- Maintain and continuously improve DAMAC Digital HSE management system across the organization.
- Apply DAMAC Digital standards consistently and uniformly across DAMAC Digital footprint irrespective of geography or local legislation.
- Lead and motivate our people to work in a safe and responsible manner and train them on safety procedures, emergency protocols, and environmental practices.
- Consult with and promote the active participation of our people in the management of their own and others' health, wellbeing, and safety.
- Provide the resources and skills necessary to achieve our continuous performance improvement with respect to the environment and the health and safety of our people.
- Ensure that employees, contractors and visitors wear appropriate PPE in hazardous areas or during tasks that require protection.
- Promptly report all accidents, incidents, near- misses, and potential hazards to facilitate preventive actions.
- Foster an open environment where employees can voice safety concerns and provide suggestions for improvements.
- Identify performance measures, set improvement targets, and report performance at all levels (recognizing excellent performance appropriately).
- Conduct routine inspections to identify potential hazards, rectify issues, and ensure compliance with safety standards.
- Use resources and energy efficiently, targeting waste, emissions and pollution in our activities, in order to minimize the impact of our activities on our communities.
- Develop and communicate emergency response plans, ensuring all personnel know how to respond effectively.

RESPECTING THE ENVIRONMENT

DAMAC Digital is committed to safeguarding the environment and recognizes its responsibility in constructing sustainable built environment. With a focus on quality excellence, DAMAC Digital aims to minimize environmental impacts by enhancing energy efficiency and conservation, promote environmental consciousness and implementing a diverse range of eco- friendly initiatives.

DAMAC Digital aims and pledges to:

1. Ensure compliance with environmental regulations and strive to exceed statutory requirements, thereby prioritizing the company's environmental performance.
2. Implement a structured and systematic environmental management system to ensure adherence to applicable environmental regulations. The system shall enable effective management, monitoring, and continuous improvement of environmental performance based on international standards.
3. Optimize and explore the efficient use of natural resources and energy throughout developments.

- Water Management and Conservation:

DAMAC Digital recognizes the critical importance of responsible water management. We are committed to setting measures to monitor and reduce water consumption in our operations. By adopting water-efficient technologies and practices, promoting awareness among employees, and encouraging responsible water usage throughout our projects, we can make a significant positive impact on our water resources.

- Enhancing Energy Efficiency and Exploring Renewable Energy Resources:

We are committed to furthering energy efficiency efforts by establishing energy-saving targets and adopting energy-efficient technologies. Our aim is to continuously improve our energy efficiency performance and minimize our carbon footprint. As part of our commitment to sustainability, DAMAC Digital will actively explore opportunities to harness renewable energy resources.

4. Promote recycling, reuse, and upcycling of materials, while actively reducing waste generation. Our commitment to reducing waste is at the core of our sustainability efforts.

DAMAC Digital will implement comprehensive waste management practices to promote recycling, reuse, and upcycling of materials wherever possible. By minimizing waste generation and promoting circular economy principles, we aim to contribute to a more sustainable future.

5. Foster open communication and consultation on environmental management issues, engaging stakeholders and raising environmental awareness.
6. Educate, promote, and involve employees, customers, suppliers, and other stakeholders in creating a better environment.
7. Establish targets and objectives for reducing environmental impacts. DAMAC Digital is committed to setting ambitious targets and objectives to reduce our environmental impacts continuously. These targets will be based on scientific evidence and aligned with global sustainability frameworks.
8. Net Zero Strategy alignment with the UAE's governance vision to achieve carbon neutrality by or before 2050. This strategic alignment underscores our commitment to proactive environmental stewardship, aiming to curtail carbon emissions and ecological impact. Our tailored approach aspires not only to meet but potentially exceed the 2050 goal, reflecting our dedication to sustainable progress.

Strive to maximize green building practices, incorporating sustainable principles into design, construction and operation of our developments. DAMAC Digital recognizes the significant impact of buildings on the environment. By utilizing environmentally friendly construction materials and sustainable building techniques, we aim to create structures that minimize environmental impacts and promote energy efficiency.

9. DAMAC Digital will actively pursue Leadership in Energy and Environmental Design (LEED) and other relevant third-party certifications for eligible developments. These certifications will ensure that our projects meet the environmental standards and provide independent verification of our sustainability efforts
10. Regularly review and update policy, ensuring compliance and prioritizing environmental performance. The implementation of this Environmental Policy will be overseen by internal Compliance Committee, which will monitor overall performance and progress. The DAMAC Digital will periodically review the Environmental Policy in line with corporate strategies and developments in environmental issues relevant to its operations.

RESPECTING COMMUNITIES

We will be good and responsible citizens in the communities in which we operate, We strive to make a positive impact by responsibly running our operations and investing in local initiatives in a way which benefits the local community.

Our Principle

DAMAC Digital has a large global presence and the impact we have on local communities and economies is of great importance to us. We respect the communities where we operate and we strive to make a positive impact by responsibly running our operations and investing in local initiatives in a way which benefits the local community.

We believe that any investment in a community should create a meaningful and sustainable impact on that community. It should be relevant to the local needs but at the same time aligned with our business and carried out in partnership with local organizations. We aim to identify the possibilities for investment through contact with Local people and organizations including local non-government bodies and community groups.

Education and health are priorities for communities worldwide. We are therefore particularly committed to focusing on community projects with strong educational and health themes whether it might be Mentoring at a local school, helping young engineers with their school projects, setting up scholarship schemes, arranging site visits for local colleges and universities, or sponsoring the education of children.

DAMAC Digital does not make any political donations or contributions, nor does it allow any of its operating companies to do so. This includes cash and non-cash items such as services, materials, employee time, or use of corporate facilities.

We Never

- Deliberately or knowingly ignore or show lack of respect to local customs or traditions.
- Use company funds or resources for political purposes.
- Participate in political activities at a corporate level.

We Always

- Respect the traditions, cultures, and laws of the countries and the local communities where we operate.
- Try to employ local people in our businesses wherever possible.
- Listen to the concerns of the local communities and try to act in a way that deals with their concerns where we can.

PRODUCT & SERVICE QUALITY

At DAMAC Digital, we are dedicated to delivering products and services of the highest quality to our valued customers. Our commitment to excellence permeates every aspect of our operations, from design and development to customer support.

Our Principle

Our customers' satisfaction is our foremost priority. We will consistently strive to understand and exceed their expectations by delivering products and services that meet or exceed their requirements.

We Never

- Sacrifice safety for the sake of expediency or cost-cutting measures.
- Ignore customer feedback or concerns, and we will actively listen to our customers and use their insights to improve our products and services.
- Compromise on the quality of materials, components, or manufacturing processes to reduce costs.
- Neglect the training and development of our employees as properly trained staff are essential for maintaining the quality of our products and services.
- Disregard any relevant regulations, standards, or laws.
- Tolerate defects in our products and services.
- Rush the design and development process, as proper planning and attention to detail are essential for creating products and services of lasting quality.
- Ignore the environmental impact of our products and services.
- Engage in unethical practices that could compromise the quality or integrity of our products and services.

We Always

- Commit to an ongoing process of improvement in our products, services, processes, and systems, and we will constantly evaluate and enhance our methods to ensure we remain at the forefront of quality and innovation.
- Employ thorough design and development processes that prioritize safety, reliability, and user-friendliness, resulting in products that consistently perform as intended.
- Our development processes will adhere to strict quality standards and best practices to ensure that our products are produced to the highest level of precision and consistency.
- Collaborate closely with our suppliers to ensure that the raw materials and components we receive meet our quality standards, contributing to the overall excellence of our products.
- Our employees are the cornerstone of our quality commitment, and we will invest in their training, provide the necessary resources, and empower them to contribute to our culture of continuous improvement.
- Maintain compliance with all relevant laws, regulations, and industry standards that pertain to our products and services. This includes safety, environmental, and quality regulations.
- Utilize data and analytics to drive informed decisions, identify trends, and proactively address potential quality issues before they impact our customers.
- Set goals to minimize defects and errors through thorough quality control processes.
- Provide responsive and effective customer support, addressing any concerns promptly and ensuring that our customers' needs are met even after the sale.
- Conduct all our business activities with integrity, honesty, and transparency, ensuring that our commitment to quality is reflected in every interaction.



LET'S GET STARTED

Email: Codetofollow@damacgroup.com

Website: www.damacdigital.com

Headquarters: 36th Floor, Shatha Tower, Dubai Internet City
Dubai, UAE