



DAMAC Anti-Bribery and Corruption Policy (DAMAC Real Estate Development Limited)

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 Group's reputation. Each of us is required to comply with anti-corruption and bribery laws. Failure to do so will result in disciplinary action, including up to termination, and could result in criminal penalties.

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 if you fail to conduct appropriate due diligence of said third parties or if you appoint or retain the services or do business with said third parties without regard to the results of the due diligence.

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. Payments made in the face of a threat to your health and safety will not be treated as improper payments. 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 Legal so that they can be accurately recorded precautionary and safety measures implemented.

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 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.

We Never

- Take part in or tolerate any form of corrupt behavior 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 the DAMAC Group.

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 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.

Approved by Chairman and DAMAC Real Estate Development Limited Board on 26th of June 2023