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## Document Control Information

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<b>Reviewed by</b>	Founder and CEO, Alpha Data
<b>Approved by</b>	Founder and CEO, Alpha Data
<b>Issued by</b>	Human Resources Team

## Policy Ownership and Review Frequency

<b>S.No</b>	<b>Ownership</b>	<b>Review Frequency</b>	<b>Last Reviewed</b>	<b>Remarks</b>
1.	HR Specialist Alpha Data	Business Dependent	Feb 2018	First edition

## 1. Overview

Alpha Data is committed to protecting employees, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. We are determined to operate all activities within the spirit and letter of all laws and regulations affecting its businesses and employees. Employees must exercise the highest level of integrity, ethics and objectivity in their actions and relationships which may affect the Company. Employees must not misuse their authority or influence of their positions in these relationships. Moreover, an employee has the duty to act in the best interest of the Company at all times. Alpha Data will not tolerate any wrongdoing or impropriety at any time. We will take the appropriate measures and act quickly in correcting the issue if the ethical code is broken.

## 2. Purpose

The purpose of these Standards is to establish a culture of openness, trust and to emphasize the employee's and consumer's expectation to be treated to fair business practices. These Standards will serve to guide business behavior and ensure ethical conduct. Effective ethics is a team effort involving the participation and support of every employee. All employees should familiarize themselves with the ethics guidelines that follow this introduction.

## 3. Scope

These Standards apply to employees, contractors, consultants, temporaries, and other workers at Alpha Data, including all personnel affiliated with third parties.

## 4. Policy for Ethical and Professional Conduct

### 4.1 Executive Commitment to Ethics

- (i) Senior leaders and executives must set a prime example. In any business practice, honesty and integrity must be top priority for executives.
- (ii) Executives must have an open door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable while discussing any issues and will alert executives to concerns within the work force.
- (iii) Executives must disclose any conflict of interests regarding their position within Alpha Data.

### 4.2 Employee Commitment to Ethics

- (i) Alpha Data employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- (ii) Every employee needs to apply effort and intelligence in maintaining ethics value.
- (iii) Employees must disclose any conflict of interests regarding their position within Alpha Data.
- (iv) Employees should consider the following questions to themselves when any behavior is questionable:
  - Is the behavior legal?
  - Does the behavior comply with all appropriate policies?
  - Does the behavior reflect values and culture?
  - Could the behavior adversely affect Company stakeholders?
  - Would you feel personally concerned if the behavior appeared in a news headline?
  - Could the behavior have adverse effects if all employees did it?

### 4.3 Company Awareness

- (i) Promotion of ethical conduct within interpersonal communications of employees will be appreciated.
- (ii) Alpha Data will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the Company.

### 4.4 Maintaining Ethical Practices

- (i) Every employee, manager, director needs to consistently maintain an ethical stance and support ethical behavior.
- (ii) Employees at Alpha Data should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.
- (iii) Alpha Data has incorporated these Standards in the Employee Manual to make sure the ethical code is delivered to all employees and that concerns regarding the code can be addressed.
- (iv) These Standards will be subject to annual review. When reviewed, HR will be responsible to communicate the updated version to all employees through internal communication.

### 4.5 Unethical Behavior

- (i) Alpha Data avoids the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- (ii) Alpha Data does not tolerate harassment or discrimination.
- (iii) Unauthorized use of company trade secrets & marketing, operational, personnel, financial & technical information integral to the success of our Company will not be tolerated.
- (iv) Alpha Data does not permit impropriety at any time and we act ethically and responsibly in accordance with applicable laws.
- (v) Alpha Data employees will not use corporate assets or business relationships for personal use or gain.

## 5. Conflicts of Interests

While Alpha Data has no wish to interfere in any employee's outside activities, the Company has a policy prohibiting conflicts of interest. A conflict of interest exists when a personal interest or activity interferes or appears to interfere with the interests of the Company. All employees are expected to act in Alpha Data's best interests and not to let personal interests or divided loyalties influence their judgment.

No outside employment is allowed while under Alpha Data's employment. An employee found breaching this policy is subject to disciplinary action including termination of employment.

Naturally, it is understood that some of Alpha Data employees might have a minority interest in a company as a stockholder. This is okay as long as it is not in a similar or competing field, and has no demand on concerned employee's time or resources.

**Holding a Significant Interest in Suppliers, Customers or Competitors:** Alpha Data's policies require that employees (and their immediate family, namely, spouses and family living in the same household) not have any ownership interests in, or own property with, any of the Company's vendors, suppliers, contractors, agencies, customers, or competitors (or their office employees) unless the Company determines that such ownership interests does not conflict with the employee's obligations to the Company. These restrictions do not apply to ownership of stock of a public Company.

## 6. Harassment & Discrimination

Alpha Data does not condone any conduct which might constitute harassment of any kind on part of its management, supervisors or non-management personnel. It is our policy that all employees have the right to work in an environment free from any type of illegal discrimination, including sexual harassment. Any employee found to have engaged in such conduct will be subject to immediate discipline up to and including discharge.

## **7. Conduct of Employees Involved in the Purchasing Process -**

### **7.1 Unlawful Use of Company Funds**

Employees may not use corporate assets or funds for any unlawful or improper purpose. Alpha Data does not authorize and will not condone any payment by any employee that is in the nature of a bribe, kickback, or a commission in excess of the required amount in ordinary course of business to a third party for obtaining any business or otherwise bestowing a special favor on the Company or employee.

## **8. Contracting with Third Parties**

Alpha Data may work with outside people or organizations to help conduct our business. They may be called agents, representatives, consultants, subcontractors, independent contractors or suppliers. No officer, employee, agent, supplier, contractor or consultant or anyone else acting for Alpha Data may pay, offer or promise to pay, or authorize payment of money, money equivalent, gifts or anything else of unethical activities that may affect Alpha Data's business and reputation.

## **9. Workplace Health, Safety and Environment**

Alpha Data is committed to workplace safety and conducts business in a safe, secure and environmentally responsible manner. Alpha Data provides its employees with a clean, hazard free, healthy & safe environment to work in accordance with the Occupational Safety and Health Federal Law No.8 of 1980. All employees are expected to take an active part in maintaining this environment in accordance with Alpha Data's Health, Safety & Environment Policy.

## **10. Anti-Substance Abuse**

Alpha Data does not tolerate any problems that may arise from drug and alcohol abuse, and is committed to provide a substance abuse free work place for its employees. This policy applies to all employees of the company, without exception, including part-time and temporary employees.

Employees are not allowed to consume or possess any alcoholic beverage, any drug or other controlled substance which may alter an individual's mental or physical capacity, on Alpha Data premises.

All employees should report evidence of alcohol or drug abuse to a supervisor or a personnel representative immediately. In cases where the use of alcohol or drugs poses an imminent threat to the safety of persons or property, an employee must report the violation. Failure to do so could result in disciplinary action for the non-reporting employee.

Employees who violate the Anti-Substance Abuse Policy will be subject to disciplinary action, including termination.

## 11. Confidential Information

“Confidential Information” refers to any information which has commercial value and is either **(i)** technical information, including patent, copyright, trade secret, and other proprietary information, techniques, sketches, drawings, models, inventions, know-how, processes, apparatus, equipment, source documents, and formulae related to the current, future and proposed services of the Company and/or any Client of the Company, or **(ii)** non-technical information relating to Company's and/or any Client's products, including without limitation pricing, margins, merchandising plans and strategies, finances, financial and accounting data and information, suppliers, customers, customer lists, purchasing data, sales and marketing plans, future business plans and other information which is proprietary and confidential to the Company and/or any Client of the Company.

Recipient will maintain in confidence and will not disclose, disseminate or use any Confidential Information belonging to Company and/or any Client of the Company, whether or not in written form. Recipient agrees that Recipient shall treat all Confidential Information of Company and/or any Client of the Company with at least the same degree of care as Recipient accords its own Confidential Information. Recipient shall immediately give notice to Company of any unauthorized use or disclosure of Company's and/or any Client of the Company's Confidential Information. Recipient shall assist Company in remedying any such unauthorized use or disclosure of Confidential Information.

If you leave Alpha Data, you must continue to keep information confidential. You must return to Alpha Data all copies of any confidential documents you may have in your possession when you leave your employment with Alpha Data.

## 12. No Retaliation Policy

Alpha Data will not tolerate retaliation against any employee, client, supplier or visitor for making a good-faith complaint, complying with any Alpha Data policy, practice or procedure or for cooperating in any investigation. Every allegation of retaliation will be investigated and appropriate action, including discipline as appropriate, will be taken based upon the results of the investigation.

## 13. Trade Sanctions and Anti-Boycott Compliance

### 13.1 Trade Sanctions

Alpha Data is committed to comply with International Business Laws to enable continued ability to do business across borders. These laws include embargoes, trade sanctions, customs, product/country of origin marking and anti-boycott laws. In furtherance of its commitment, Alpha Data on behalf of all branches acknowledges that it complies with general and specific trade restrictions with respect to the following Countries amongst others that currently have restrictive measures imposed against them by the UN, the EU and the U.S.

- Crimea Region of the Ukraine
- Cuba
- Iran
- Myanmar (Burma)
- North Korea
- Sudan
- Syria

Before opening any project with any new customer, you must first check to ensure that the customer is not located in or is not a part of a Company incorporated in a country where Alpha Data cannot do business. You also should check to make sure that the customer is not on any list of companies, banks and individuals with whom the government prohibits us from doing business.

## 14. Policy Compliance

**Compliance Measurement:** The Human Resource team will ensure compliance to this policy.

**Exceptions:** There will be no exceptions for any non-compliance under this policy.

**Non-Compliance:** An employee found to have violated this policy, despite warning, will be subject to disciplinary action.

## 15. Reporting Non Compliance

If at any time, any employee of Alpha Data becomes aware of or suspects unethical conduct or violation of Alpha Data policies herein, he/she must report it immediately to Human Resource Specialist.

Reporting can also be done via web reporting at <https://www.alpha.ae/contact-us/complaint-form>.

## 16. Internal Monitoring and Auditing

Human Resources Specialist will be responsible to initiate annual compliance audit and present the report to the Chief Compliance Officer for his review and action, as may be deemed necessary.

## **17. Training & Education**

To enable clear understanding of the Standards, compliance training and education session for employees will be scheduled annually. For new hires, such training shall be included as part of new hire orientation.

## **18. Chief Compliance Officer**

Chief Compliance Officer shall be charged with the responsibility for overseeing compliance with the Standards and ensuring effectiveness of compliance with standards, applicable laws and regulations at every level of the Organization.

Director of Operations for Abu Dhabi and Dubai have been named to be the Chief Compliance Officer for their regions respectively.

## **19. Annual Review**

The Standards of Business Conduct shall be subject to annual review to determine need for any amendments. Responsibility for annual review shall jointly lie with HR, Legal and Compliance.