



## Alef Education Third Party Code of Business and Ethical Conduct

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### UPDATING

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**1. Introduction**

Alef Education is committed to conducting business with the highest standards of ethics, integrity, and transparency and as an integral part of our business activities, Third Parties i.e. entities (including their employees or subcontractors) or individuals sub-contracted to work for or with Alef Education or that provide goods or services to Alef Education play a crucial role in upholding these principles.

These core principles are reflected in this Third Party Code of Business and Ethical Conduct (**Code**), which establishes the minimum standards that must be met by any entity that supplies products or services to Alef Education.

**2. Compliance with laws and regulations and priority of standards**

- 2.1. In carrying out its agreement(s) with Alef Education, Third Parties shall, in addition to complying with the standards set out in this Code, comply with all applicable UAE laws and regulations (and if applicable, the laws and regulations of any other jurisdiction where it or its Representatives operate) including but not limited to the laws and regulations relating to issues addressed in this Code.
- 2.2. Competing standards shall be addressed as follows:
  - (a) If there is a conflict between any applicable laws or regulations, the provisions of an agreement with Alef Education and the provisions of this Code, the Third Party shall meet the most stringent standard.
  - (b) If there is a conflict between the provisions of an agreement with Alef Education and the provisions of this Code, the Third Party shall meet the standard as set out in the agreement.

**3. Quality Management**

- 3.1. As part of its operational excellence, Alef Education is fully committed to maintaining customer satisfaction by delivering high-quality products and services. Third Parties must contribute by continually improving their performance, supplies, and services in a cost-effective manner to support Alef Educations commitment to ISO Standard requirements.

**4. Environmental and Sustainability**

- 4.1 Alef Education is committed to preserving the environment and demonstrating continual improvement in its environmental performance by adhering to industry best practices. We expect responsible sourcing and the sustainable use of natural resources from our Third Parties. Additionally, we recommend that Third Parties develop and implement a sustainability strategy outlining their commitments to Environmental, Social and Governance (ESG) principles. This strategy should include a standalone or fully integrated environmental management system based on ISO Standards.
- 4.2 The Third Party shall ensure that:

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- a) its operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) climate change, waste disposal, emissions, discharges and the handling of hazardous and toxic materials;
- b) the goods it manufactures (including the inputs and components that it incorporates into its goods) comply with all applicable environmental laws and treaties; and
- c) it will only use packaging materials that comply with all applicable environmental laws and treaties.

**5. Ethical Business Practices**

5.1. Alef Education is dedicated to conducting business with integrity and transparency, which entails open, honest, and accurate communication in all interactions with Third Parties. We expect our Third Parties to uphold these standards by maintaining accurate financial records, disclosing potential conflicts of interest, and refraining from engaging in misleading or deceptive practices. It is imperative that all business transactions are thoroughly and clearly documented. We firmly believe that transparency cultivates trust and enables a strong, collaborative partnership between our company and its Third Parties.

**6. Insider Trading**

6.1. Third Parties who are identified as insiders of our company, including those with access to material non-public information, are strictly prohibited from trading in the company’s securities during blackout periods or at any time while in possession of such information. Engaging in insider trading violates both legal regulations and ethical standards. Third Parties must strictly adhere to all related insider trading regulations and abstain from any involvement in such activities. This includes refraining from disclosing non-public information about Alef Education to individuals who might exploit it for trading purposes. Furthermore, Third Parties are responsible for ensuring that their employees, contractors, and agents abstain from participating in insider trading practices.

6.2. Third Parties must comply with applicable securities laws and regulations and are expected to adhere to our company’s policy on Share Dealing and Insiders Trading to maintain the integrity of our business operations.

**7. Anti-Money Laundering**

7.1. Alef Education strictly prohibits any business dealings or actions that could facilitate criminal behavior or contravene laws related to anti-money laundering or terrorism financing. We require all Third Parties to comply with relevant laws, statutes and regulations and implement adequate measures to prevent such illegal activities from occurring.

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**8. Bribery and corruption**

- 8.1. The Third Party shall comply with all applicable laws, statutes and regulations relating to the prevention of bribery and corruption (including but not limited to the Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977). To that end, the Third Party shall not accept, offer, promise, pay, permit or authorise:
  - a) bribes, facilitation payments, kickbacks or illegal political contributions;
  - b) money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage; or
  - c) any other unlawful or improper payments or benefits.

**9. Gifts and entertainment**

- 9.1. Third Parties are required to engage in business with Alef Education based on the quality and excellence of their products and services, while upholding the utmost integrity in all dealings.
- 9.2. Third Parties are prohibited from offering gifts or entertainment intended to influence the judgment of any Alef Education employee and should avoid any actions that could be perceived as exerting inappropriate influence. Alef Education’s policy allows modest business gifts within a reasonable value, not exceeding AED 500 (approximately USD 136) and frequency, provided they are customary and appropriate within a business context.

**10. Conflicts of Interest**

- 10.1. Third Parties must disclose any potential conflicts of interest that may arise during their business dealings with Alef Education. All business decisions should be made based on objective criteria and free from personal interests that could compromise integrity. If a Third Party is in doubt on whether a situation is considered a conflict of interest, then they have an obligation to raise the matter to Alef Education’s Procurement Department to clarify any doubt and ensure transparency.

**11. Fair Competition**

- 11.1. Third Parties must promote fair competition and comply with antitrust and competition laws. This includes refraining from engaging in any anti-competitive practices such as price-fixing, bid-rigging, or market allocation.

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**12. Labor and Human rights**

**12.1. Modern Slavery, Human Trafficking and Child Labour**

- a) Alef Education is dedicated to safeguarding human rights, with a firm stance against any involvement in child or forced labour, slavery, and human trafficking.
- b) Third Parties shall comply with all applicable anti-slavery and human trafficking laws, statutes and regulations from time to time in force in any part of its supply chain. Third Parties are obligated to report to Alef Education any instances, whether suspected or confirmed, of human rights violations.

**12.2. Anti-discrimination**

- a) Third Parties are required to maintain a workplace free from discrimination and harassment, aligning with our commitment. They must comply with applicable laws, regulations, and standards concerning non-discrimination and harassment, refraining from discriminating against employees based on any characteristic, whether protected or not.
- b) Additionally, Third Parties are expected to establish appropriate policies and procedures for reporting and addressing any instances of discrimination or harassment.

**12.3. Working Environment**

- a) The Third Party shall provide a safe, healthy, and sanitary working environment and comply with the relevant health and safety laws and any other relevant laws where it operates. This includes, but is not limited to, implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries.
- b) Where such hazards cannot be adequately prevented or controlled, the Third Party shall provide workers with appropriate personal protective equipment to protect against hazards typically encountered in that scope of work.
- c) Third Parties are also required to comply with the relevant laws and regulations which pertains to workers working hours, wages and benefits.

**13. Data Privacy and Confidentiality**

- 13.1. Third Parties must protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification, and disclosure, through appropriate physical and electronic security procedures.
- 13.2. Third Parties must comply with all data protection laws and requirements (including the UK GDPR) when processing any personal data on Alef Education’s behalf.
- 13.3. The Third Party shall have in place appropriate measures to:

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- a) protect the integrity and confidentiality of information (including information belonging to or supplied by Alef Education) held on its systems (which include physical and online or electronic systems); and
- b) ensure that there is no unauthorised access of the information by third parties, including its Representatives.

13.4. Information should strictly serve its intended business purpose and not be utilised for activities such as advertising or publicity without prior authorisation from the owner. Third Parties are prohibited from sharing internal or material non-public business details, such as pricing, discounts, profits, or customer information, with competitors, especially regarding work conducted for Alef Education.

**14. Alef Education Assets**

14.1. Alef Education is dedicated to operating a sustainable and reputable business, and our physical and intangible assets are crucial to achieving this goal. Assets such as computers, telephones, mobile phones, fax machines, copy machines, conference rooms, vehicles, equipment, tools, and similar items are strictly for Alef Education’s use unless prior explicit permission to use them has been obtained from Alef Education.

**15. Execution of Works**

15.1. Under no circumstance should a Third Party mobilise resources or pre-order goods without a formally approved purchase order, letter of award or contract issued by the Procurement Department. Third Parties will bear sole responsibility for any costs associated with such mobilisation. In case of doubt, it is strongly advised to report to the Procurement Department via email at Procurement@alefeducation.com

**16. Communication with Stakeholders**

16.1. All initial inquiries regarding registration and grievances must be directed to Procurement@alefeducation.com. Once Third Parties are invited by Alef Education’s Procurement Department to bid for goods and services, they will be informed about focal points for technical and commercial queries.

**17. Compliance, Monitoring and Reporting**

17.1. The Third Party shall monitor its compliance with the Code and shall report any breaches (actual or suspected) of this Code as soon as possible to internalaudit@alefeducation.com and remedy any such violation in a timely manner. This obligation extends to breaches of applicable law or regulation. Failure by a Third Party to do so or commit to a plan to achieve compliance may lead to review or termination of the relationship with Alef Education.

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17.2. Third Parties shall not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this Code or questionable behaviour, or who has sought advice regarding this Code.

17.3. Third Parties are expected to continuously assess and improve their business practices to align with the principles outlined in this Code.

## 18. Updating this Code

Alef Education has the right to modify this Code from time to time on giving the Third Party at least 30 days' notice in writing (writing includes email).

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