



Union Iron and Steel

Human Resources

Code of Conduct

Document Ref.

UIS-HRA-FM-30

Rev. No

0

Rev. Date

NOV2017

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I. Purpose

The Code of Conduct (the Code) provides a clear framework within which employees of Union Iron and Steel (UIS) are expected to conduct themselves. It is designed to assist employees to understand their responsibilities and obligations and provide guidance on expected behaviour in the workplace, or if faced with an ethical dilemma or conflict of interest in their work involving colleagues, UIS and the local and international communities.

The Code does not seek to encompass all possible scenarios arising in employment with the UIS however; it provides a set of principles to guide employees on acceptable and unacceptable behaviour. The Code should be read in conjunction with the UIS HR Manual Policies and Procedures and UAE Law.

Power International Holding strives to maintain a work environment for its employees in which people, excellence, transformation, customer service, innovation and performance is constantly reflected in personal behaviour and standards of conduct.

II. Scope

This policy applies to all employees of the Union Iron and Steel LLC and persons visiting or working with the Company.

Consultants, contractors and sub-contractors are expected to comply with the Code as a condition of their engagement with UIS.

II. Responsibility

Originate	:	Group Human Resources, Chief Human Resources Officer
Review	:	Group Organizational Development Manager, Chief Human Resources Officer
Approval	:	Group Chief Executive Officer and Vice President
Execution, Implementation and Maintenance	:	HOD / Director / Senior Managers / Managers / Supervisors / Human Resources

III. Abbreviations and Acronyms

BU	:	Business Unit
UIS	:	Union Iron & Steel
BUH	:	Business Unit Head
HR	:	Human Resources
HOD	:	Head of Department
ER	:	Employee Relations



V. Policy Statements

UIS and its employees shall maintain a professional image and ensure that no activities of UIS are in anyway in contravention of local laws and regulations. UIS shall maintain cordial and harmonious relationships with all internal and external customers including government ministries and public offices.

This code covers some of the most important issues relating to personal conduct, and gives a framework of standards and behaviour guidelines, but it is not intended to be exhaustive.

The following UIS defining principles and values underpin the Code of Conduct and govern quality activities:

Value	Description
People	We strive to have people practices that make UIS an employer of choice, and respect the traditional rights of all the stakeholders. Respect for each other, our customers and for the community at large
Excellence	Excellence is defined as our ability to deliver the quality and value in the products and services we offer. We pursue excellence in our actions and behaviour through the development of critical, disciplined thinking, logic and reasoning.
Transformation	We will focus on meeting our obligations as per laws and more importantly, create a culture that ensures long term sustainability of the organization and all stake holders
Customer Focus	We will utilize our multi-disciplinary experience and expertise to develop, package and deliver the customer focused products and services
Innovation	We will continuously seek and develop new and improved ways to deliver our product and services to ensure we are more efficient and effective – thus achieving the UIS objectives.
Performance	Our individual and business unit performance will be aligned to deliver stakeholder value and growth. We will do this by being customer-centric in our approach



UIS values guide how we behave towards our employees and the wider community. These principles are what we stand for and we will bring these principles to life in everything we do.

This Code of Conduct confirms that commitment and outlines the expectations of all employees of the Company and is designed to promote a culture of fair, respectful and ethical behaviour and to ensure the Company meets its obligations under UAE legislation.

The Code will assist in the integrity and professionalism of all employees by ensuring that all employees:

- Maintain appropriate standards of conduct;
- Exhibit fairness, impartiality, honesty and equity in decision making
- Foster and protect the reputation of the Company.

Employees can expect that managers and senior management will lead by example in actively promoting and complying with the Code.

All employees are expected to act with integrity, which includes being aware of and acting within the laws that apply to their conduct.

1.0 Standards of Personal Behavior Policy Statement

Essentially the Code is a public statement about how UIS expects to be perceived and ultimately judged. All employees are required to comply with the Code.

2.0 Fair, Safe, Healthy and Ethical Environment Policy Statement

- 2.1 An ethical environment relies upon individuals having responsibility for their own professional behaviour. UIS has a responsibility to provide a safe, encouraging and supportive work environment that recognizes and values employee diversity, abilities and contributions.
- 2.2 All employees are entitled to be treated with respect and work in an environment free from discrimination, harassment, bullying, violence (or threats of violence), abuse, backbiting or unjust criticism. Equally, employees have a responsibility to act with integrity, honesty, transparency and impartiality in their dealings with colleagues and members of the wider community.



- 2.3 UIS places a high priority on providing a safe and healthy working environment and will act positively to minimize the incidents of all workplace risks as required by relevant UAE legislation. Employees are required to perform their duties in a safe and competent manner in accordance with relevant Health and Safety legislation and UIS policies and procedures.
- 2.4 Employees must take care not to put themselves or other members of the Company at risk or reduce their ability to carry out their duties through unsafe practices, inappropriate behaviors or the misuse of intoxicating substances. Every effort should be made to ensure that employees are safe and secure on the company premises/sites or at external functions or activities.
- 2.5 Through the HSE Department, UIS's aim is to continuously improve standards, and the comprehensive use of risk assessments so as to systematically remove the causes of accidents/incidents and ill-health to promote employee wellbeing.

3.0 Personal and Professional Behavior Policy Statement

- 3.1 All employees are to perform any duties associated with their position diligently impartially and conscientiously to the best of their ability. In the Performance of their duties, employees must.
- 3.2 Treat other employees and members of the public with respect, courtesy and sensitivity in a non-discriminatory way.
- 3.3 Attend meetings on time, respect one another and conduct (or participate in) meetings in a structured and meaningful manner.
- 3.4 Provide all necessary and appropriate assistance in a proactive and supportive way for the betterment of all.
- 3.5 Comply with any relevant legislative, administrative requirements and all Company rules,policies and procedures.
- 3.6 Maintain adequate records to support any decisions made.
- 3.7 Strive to keep up-to-date with advances and changes in the body of knowledge and the professional and ethical standards relevant to their area of expertise.
- 3.8 Maintain the confidentiality of official and personal information.
- 3.9 Strive to obtain value for Company money spent and avoid waste and extravagance in the use of company resources.



- 3.10 Avoid undertaking any activity that could potentially compromise the performance of their duties.
- 3.11 Be responsible for their performance. UIS expects individuals to follow all reasonable rules and instructions given by those supervising or managing their activities and/or work areas and
- 3.12 Comply and adhere to this Code.

4.0 Equity, Diversity and Inclusion Policy Statement

- 4.1 UIS seeks to ensure that the work environment for its employees is supportive and supportive and one where individual respect is shown to all. All employees, regardless of their gender, race, ethnic background, culture, age, religion, socio-economic status or any other factor will be supported and encouraged to perform to their potential.
- 4.2 Managers are instrumental in creating a work environment where all employee are able to participate fully, have a sense of Belonging and an opportunity to engage meaningfully with others.
- 4.3 Employess will act to create a fair, respectful, inclusive and safe work environment where diversity is valued and where unlawful discrimination, violence (or threats of violence), bullying, harassment and victimization in any form are considered unacceptable and will not be tolerated.
- 4.4 Managers and employees must understand their responsibilities in relation to Company rules, policies and procedures and UAE legislation and integrate the Principles of equality of opportunity, natural justice and inclusivity into their day-today practices and behaviors.

5.0 Employment Contract & Sponsorship Policy Statement

- 5.1 The primary purpose of company sponsorship is for the on-going maintenance of the employment contract. The HR Department is responsible for adming the employment contracts for employees. Therefore, when the employment contract ceases,
- 5.2 Company visa sponsorship is not limited to the employment contract and employment duration. The Company may also be responsible for an employee's access to government services and community privileges.



For example, the following services are indicative of what may require company approval by either providing a valid visa and/ or a no objection letter:

- Motor vehicle license
- UAE Exit Permit
- Liquor license
- Driver schooling
- Changing employers
- School enrolment
- Travelling to another visa country (and re-entering)
- Opening a bank account
- Applying for finance
- Applying for insurance
- Getting married

Employees are to check with the Human Resources department to confirm their obligations under their visa sponsorship and residency.

- 5.3 Just as these requirements are necessary for the maintenance of each expatriated employee's visa, it also follows for those employees who are employed on married and single status. It is the employee's responsibility to maintain the currency of their spouse or families visas, and to ensure full compliance with local immigration requirements.

The company will assist Senior Managers and Directors to obtain their spouse and/or family visas.

- 5.4 UAE requires a No Objection Certificate (NOC) from the employer to allow one of their employee's to obtain employment with another company. It is normal regional business practice, and the policy of UIS to only issue an NOC to an employee if they have lost their job with UIS as a result of operational requirements.

A cessation in employment due to disciplinary action or voluntary resignation will not automatically qualify for an NOC, and UAE's labour and immigration controls will then ensue.