



ARKA SUPPLIER AND PARTNER **CODE OF ETHICS**

V1.0-2025



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Article I. INTRODUCTION

At ARKA Distribution L.L.C-FZ ("ARKA"), we uphold the highest standards of professional conduct and expect the same from our Suppliers and Partners. This Supplier & Partner Code of Ethics ("Code") defines the core principles, business practices, and legal obligations that govern our relationships with third parties. Suppliers and Partners must operate ethically, lawfully, and in alignment with ARKA's values of transparency, integrity, fairness, and responsibility.

This Code applies to all suppliers, vendors, service providers, agents, consultants, and other third parties providing goods or services to or on behalf of ARKA, including their subcontractors. Non-compliance with this Code may result in termination of business relationships and legal consequences.

Article II. WORKING TOGETHER

Section 2.01 RESPECT

ARKA is committed to fostering inclusive, respectful, and dignified workplace environments. We expect our Suppliers and Partners to:

- Promote equality, non-discrimination, and fairness regardless of nationality, race, religion, gender, age, disability, or cultural background.
- Ensure that all workers are treated respectfully, without harassment, coercion, or verbal or physical abuse.
- Uphold professional conduct and cultural sensitivity, particularly while engaging with ARKA or visiting our premises.

Section 2.02 FAIR LABOR PRACTICES

Suppliers and Partners must:

- Comply fully with UAE labor laws and internationally recognized human rights and labor standards.
- Prohibit the use of forced labor, bonded labor, indentured labor, child labor (under the age of 18 unless legally permitted and safe), or any exploitative labor practices.
- Avoid the retention of employees' passports, identity papers, or deposits as a condition of employment, unless legally authorized.
- Provide fair compensation, legal working hours, safe working conditions, and statutory benefits including medical insurance, leave, and end-of-service entitlements.
- Ensure that recruitment agencies, labor suppliers, and subcontractors also comply with these requirements.



Section 2.03 HEALTH, SAFETY & THE ENVIRONMENT (HSE)

ARKA prioritizes the health and safety of individuals and the protection of the environment. Suppliers and Partners must:

- Maintain a safe and hazard-free workplace and comply with all relevant HSE legislation and ARKA-specific HSE policies.
- Provide appropriate personal protective equipment (PPE), training, and supervision for hazardous tasks.
- Develop and implement emergency procedures and ensure workers are trained in emergency response protocols.
- Comply with all applicable environmental laws and obtain required permits.
- Strive to minimize pollution, waste, and energy consumption, and promote sustainable and environmentally conscious practices.

Article III. BUSINESS INTEGRITY

Section 3.01 ANTI-BRIBERY & CORRUPTION

ARKA maintains a zero-tolerance stance on bribery, corruption, fraud, money laundering, and other unethical practices. Suppliers and Partners must:

- Fully comply with UAE Federal Decree-Law No. 31 of 2021 and international anti-corruption conventions.
- Never offer, solicit, or accept bribes, kickbacks, or anything of value intended to improperly influence business decisions.
- Not engage in facilitation payments, unless explicitly permitted by written law.
- Implement policies, training, and controls to detect and prevent corruption across all business activities.

Section 3.02 GIFTS & ENTERTAINMENT

Suppliers and Partners must:

- Avoid offering or receiving gifts, entertainment, or hospitality that may appear to influence or compromise professional judgment.
- Prohibit cash gifts, excessive or frequent invitations, and lavish items, especially during tenders or active negotiations.
- Ensure any permissible hospitality is reasonable, culturally appropriate, and disclosed to ARKA where required.

Section 3.03 CONFLICT OF INTEREST

Suppliers and Partners must:

- Disclose any personal, professional, or financial interest that could interfere with objectivity or decision-making in business with ARKA.



- Avoid engaging in transactions or negotiations that may benefit an employee's relatives, associates, or personal investments without prior disclosure and written approval.
- Maintain a strict separation between personal and business interests and refrain from exploiting relationships or confidential information for personal gain.
- Promptly notify ARKA Compliance if a potential conflict arises during the course of the engagement.
- Implement internal controls to detect and manage conflicts of interest, consistent with international standards such as ISO 37001 (Anti-Bribery Management Systems).

Section 3.04 TRANSPARENCY

Suppliers and Partners are expected to:

- Maintain accurate and truthful books, records, and communications, consistent with legal and accounting standards.
- Immediately disclose any irregularities, suspicious transactions, or relevant regulatory investigations.
- Cooperate fully with ARKA during audits, inspections, or investigations.

Section 3.05 FAIR BUSINESS PRACTICES

Suppliers and Partners must:

- Conduct business in accordance with all applicable competition and antitrust laws.
- Refrain from collusion, bid rigging, false advertising, or misrepresentation of capabilities.
- Adhere to all UAE trade laws, customs regulations, export controls, and applicable international sanctions.

Article IV. SAFEGUARDING

Section 4.01 PROTECTING ARKA'S ASSETS

Suppliers and Partners are responsible for safeguarding any physical or digital property, infrastructure, or equipment provided by ARKA. They must:

- Use assets strictly for the intended and authorized purposes.
- Prevent misuse, damage, or theft of ARKA property.
- Report loss or unauthorized use immediately.

Section 4.02 CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Suppliers and Partners must:

- Treat all proprietary, technical, and commercial information as confidential.
- Not share or use ARKA's data, technology, or intellectual property without prior written authorization.
- Respect ARKA's legal rights to patents, designs, software, trade secrets, and business know-how.
- Prohibit insider trading or financial speculation based on confidential information.



Section 4.03 DATA PRIVACY AND PROTECTION

Suppliers and Partners must:

- Handle all personal and business data in compliance with UAE's Personal Data Protection Law (PDPL) and international privacy frameworks like GDPR.
- Ensure data is collected, processed, and stored securely.
- Report any data breach to ARKA Compliance within 24 hours.

Article V. ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG)

- Suppliers must commit to sustainable sourcing, energy conservation, and ethical resource use.
- Avoid dealings with sanctioned or embargoed countries as per UAE regulations.
- Promote diversity, community development, and ethical leadership.

Article VI. MONITORING, TRAINING & ENFORCEMENT

- Suppliers must undergo annual Code of Ethics training or acknowledgment.
- ARKA reserves the right to audit compliance periodically.
- Suppliers must provide documentation, personnel access, and full cooperation during audits.

Article VII. COMMUNICATION & REPORTING

ARKA is unwavering in its commitment to business ethics and compliance. We expect Suppliers and Partners to actively support this commitment by reporting any ethical concerns, legal violations, or breaches of this Code.

You may report concerns via

Email: compliance@arkadistribution.com

OR

Phone: +971 55 23 23 241

Reports will be treated with strict confidentiality and handled impartially. Retaliation against whistleblowers who report in good faith is strictly prohibited. Suppliers and Partners are required to cooperate reasonably with any investigation initiated by ARKA's Compliance Office. This includes timely provision of relevant records, access to personnel, and maintaining the confidentiality of sensitive matters under review.



Article VIII. GOVERNANCE STRUCTURE

- Oversight of this Code lies with ARKA's Ethics & Compliance Officer.
- The Code shall be reviewed annually and updated as necessary.
- Breaches of the Code may result in sanctions, including contract termination and legal reporting.

Article IX. ACKNOWLEDGMENT

By engaging in business with ARKA Distribution L.L.C-FZ, the Supplier or Partner affirms their understanding of, and commitment to, the principles and obligations outlined in this Code.

This Code is supplemented by ARKA's Anti-Bribery Policy, Data Protection Policy, and HSE Manual. These documents are available upon request and must be adhered to in conjunction with this code.

Signed on behalf of the [Supplier/Partner]

Name:

Designation:

Signature:

Date:

For ARKA Distribution L.L.C-FZ:

Name:

Title: Director of Compliance

Signature:

Date: