

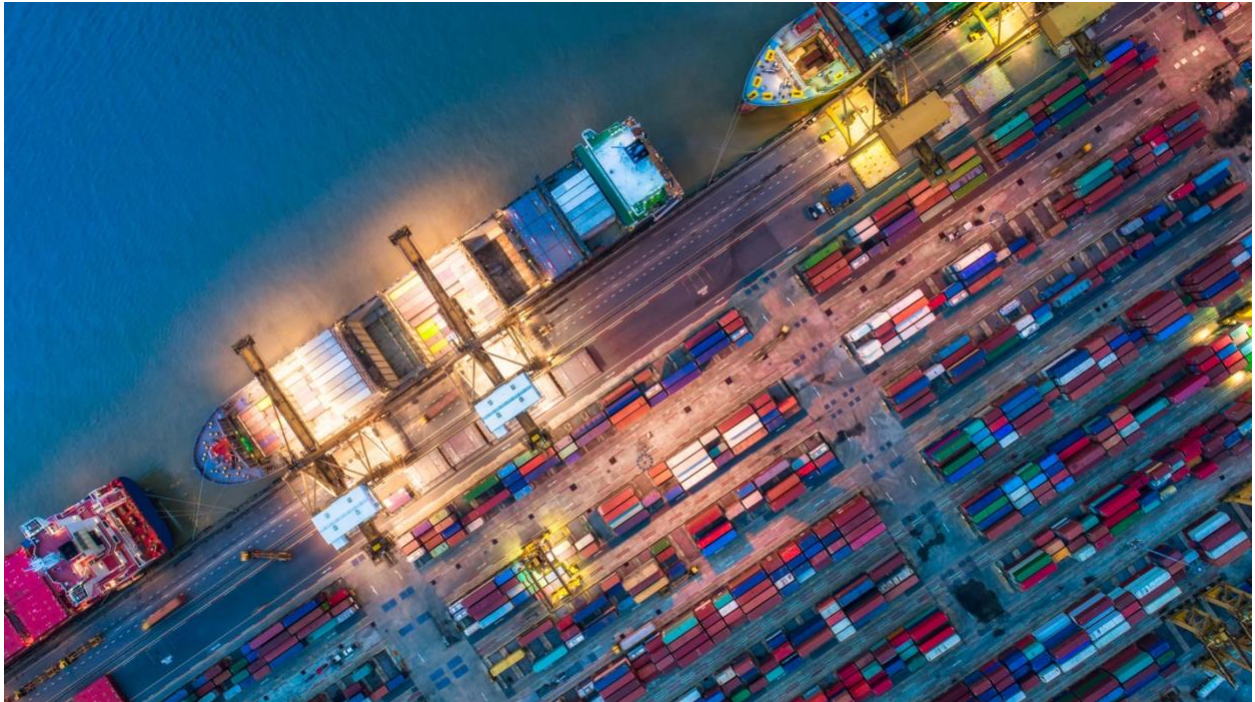


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# TANTIVY LOGISTICS LLC

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## CODE OF CONDUCT



2022, Level 20 Burjuman Business Tower, Al. Mankhool, Dubai, UAE.

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## INTRODUCTION

Tantivy Logistics LLC is committed to promoting ethical trade practices throughout its supply chain. Our Code of Conduct for Ethical Trade Initiative outlines our expectations for suppliers and partners, including standards for labor rights, health and safety, environmental responsibility, and business ethics. By adhering to this Code of Conduct, we strive to create a fair and responsible supply chain that supports sustainable economic growth and a great working environment and culture which encourages the team to grow. We believe that responsible business practices are essential for long-term success, and we are committed towards working with our suppliers and partners to achieve these standards.



### Purpose:

The purpose of this Code of Conduct is to ensure that all employees, contractors, and other stakeholders of Tantivy Logistics LLC conduct themselves in a professional, ethical, and legal manner.

### Scope:

This Code of Conduct applies to all employees, contractors, and other stakeholders of Tantivy Logistics LLC, including those working in our offices, facilities, and on projects.

### Expected Behaviors:

- Adhere to all laws, regulations, and ethical standards.
- Foster a culture of respect, honesty, and fairness.
- Protect the confidentiality and privacy of sensitive information.
- Provide quality and safe services to our customers.
- Conduct business in an environmentally responsible manner.
- Encourage diversity and inclusiveness in the workplace.

### Prohibited Behaviors:

- Discrimination, harassment, or bullying of any kind.

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- Conflict of interest, bribery, or corruption.
- Theft, fraud, or misuse of company resources.
- Use of drugs or alcohol while on the job.
- Deliberate damage to company property or equipment.

#### Reporting Mechanism:

If an employee or contractor witnesses or becomes aware of a violation of this Code of Conduct, they should report it immediately to their supervisor or HR department or email to [info@tantivy.co](mailto:info@tantivy.co).

#### Review and Update Process:

This Code of Conduct will be reviewed annually by the HR department and updated as necessary to reflect changes in laws, regulations, and company policies.

#### Adoption and Implementation:

Tantivy Logistics LLC is committed to upholding the principles outlined in this Code of Conduct, and all employees and contractors are expected to abide by it. This Code of Conduct will be communicated to all stakeholders and made available on the company's website.

#### Resources:

Tantivy Logistics LLC will provide training and support to help employees and contractors understand and abide by this Code of Conduct.

#### Commitment:

We are committed to conducting our business with integrity and upholding the highest standards of ethics and professionalism. All employees and contractors are expected to play a role in maintaining this culture.



## 1. Fair and Sincere Business Activities

- 1.1. Compliance with Laws and International Rules. We follow the laws and regulations of our own country (UAE) and other countries in which we operate, as well as the international conventions and rules pertaining to trade practices. At the same time, we honor and respect the cultures and customs of various regions of the world.
- 1.2. With respect to our business operations, we engage in ethical business practices such as obtaining permits and approvals required by each country's regulatory requirements.
- 1.3. To pursue the assurance of safety, we abide by security rules such as International Civil Aviation Organization (ICAO), International Maritime Organization (IMO) and other rules / regulations stipulated by various countries as well as the rules of handling dangerous goods.
- 1.4. Upon the arrangement of import and export procedures requested by the customer, we comply with the related import and export laws of each country.
- 1.5. Upon dealing with business partners, we assure that we will not use our dominant bargaining position to delay or refuse payments, or unjustly return or refuse acceptance of products/services of subcontractors.
- 1.6. Prohibition of Bribery. We strictly prohibit to give, offer, promise to pay, accept nor request anything of value for the purpose of improperly obtaining or maintaining business or to obtain any improper business advantage.
- 1.7. Prohibiting Conflict of Interest. We will not engage in acts that result or might result in a conflict of interest with the company.
- 1.8. We will engage in trade with suppliers and customers with fairness and impartiality and will not compromise the interests of the company by promoting the interests of oneself, relatives, friends or acquaintances or designated organizations.
- 1.9. In the selection of suppliers, we will undertake a process appropriately and fairly on the condition that we accordingly assure the supplier's reliability of its goods or services, stable management, and furthermore, fulfilling social responsibilities including compliance with laws and social norms, environmental preservation, anticorruption, respect of human rights, creation of employment and work environment, etc.





## 2. Respect for Human Rights

- 2.1. Respect for International Norms on Human Rights. We respect international norms on human rights and will not engage in acts that violate human rights and the dignity of the private individual in any of our business activities.

## 3. Commitment on Freedom of Employment

- 3.1. There is no forced, bonded or involuntary prison labour.
- 3.2. Workers are not required to lodge "deposits" or their identity papers with the company and are free to leave the company after contractual notice.

## 4. Freedom of association and Right to Collective Bargaining.

- 4.1. Freedom of association and Right to Collective Bargaining are respected in the company.
- 4.2. Workers, without distinction, have the right to join or form association of their own choosing and to bargain collectively.
- 4.3. The company adopts an open attitude towards the activities of trade unions and their organisational activities.
- 4.4. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 4.5. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.
- 4.6. The company adopts and promotes open door policy and all employees are free to discuss any of their concerns with the management without any fear or prejudices.
- 4.7. The company undertakes to organize monthly meetings between management and employees to discuss and resolve any issues or problems facing the employees.



## 5. Health, Safety and Environment

- 5.1. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- 5.2. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 5.3. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 5.4. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 5.5. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 5.6. The company shall assign responsibility for health and safety to a senior management representative.
- 5.7. We strive to minimise the adverse effects of our activities on the environment, to be continually aware of this, and to seek options to further improve and develop this. We carry out our activities in line with the applicable legislation and regulations in the field of the environment.

## 6. Strict Anti Child-Labour Policy

- 6.1. There shall be no new recruitment of child labor.
- 6.2. The company shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labor to enable her or him to attend and remain in quality education until no longer a child.
- 6.3. Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 6.4. These policies and procedures shall conform to the provisions of the relevant ILO standards.

## 7. Company's commitment on paying the Living Wages

- 7.1. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.



- 7.2. The company undertakes to follow the UAE Labor Laws.
- 7.3. All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 7.4. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

## 8. Company policy on Working hours.

- 8.1. Working hours must comply with national laws, collective agreements, and the provisions of 8.2 to 8.7 below, whichever affords the greater protection for workers. Sub-clauses 8.2 to 8.7 are based on international labor standards.
- 8.2. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.\*
- 8.3. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following:
- 8.3.1. The extent, frequency and hours worked by individual workers and the workforce as a whole.
- 8.3.2. It will not be used to replace regular employment.
- 8.3.3. Overtime will always be compensated at a premium rate, which will be not less than 125% of the regular rate of pay.
- 8.4. The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 8.5 below.
- 8.5. Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:
- this is allowed by national law;
  - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
  - appropriate safeguards are taken to protect the workers' health and safety;
  - the company can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.





- 8.6. Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.
- 8.7. \* The company will strive to progressively reduce normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

## 9. Company's No discrimination Policy

- 9.1. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 9.2. Regular employment is provided. The company undertakes to ensure that all work performed must be on the basis of recognized employment relationship established through national law and practice.
- 9.3. Obligations to employees under labor or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labor-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
- 9.4. Company does not allow harsh or inhumane treatment. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

