



# **CODE OF BUSINESS CONDUCT AND COMPLIANCE**

MUTTAHIDAH FZE  
[WWW.MUTTAHIDAH.COM](http://WWW.MUTTAHIDAH.COM)



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## 1. Introduction

MUTTAHIDAH FZE is committed to conducting business with integrity, transparency, and in full compliance with all applicable laws and regulations in the **UAE, EMEA, Europe, Africa, Asia, and the Americas**. This **Code of Business Conduct and Compliance** outlines the fundamental principles that govern our operations worldwide.

All employees, officers, directors, partners, contractors, suppliers, and third-party stakeholders are expected to adhere strictly to this Code. Violations may result in disciplinary action, including termination and legal proceedings.

## 2. Legal & Regulatory Compliance

MUTTAHIDAH FZE complies with all applicable laws, regulations, and industry standards, including but not limited to:

### 2.1 United Arab Emirates (UAE)

- **UAE Commercial Companies Law (Federal Law No. 2 of 2015)**
- **UAE Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Laws (Federal Decree-Law No. 20 of 2018)**
- **UAE Cybercrime Law (Federal Law No. 5 of 2012)**
- **UAE Federal Decree-Law No. 31 of 2021 (Penal Code)**
- **UAE Labor Law (Federal Decree-Law No. 33 of 2021)**
- **UAE Federal Data Protection Law (Law No. 45 of 2021)**
- **UAE Anti-Bribery and Anti-Corruption Law**

### 2.2 Europe & EMEA

- **EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)**
- **EU Anti-Bribery Laws & OECD Anti-Corruption Principles**
- **UK Bribery Act 2010**
- **European Directive on Whistleblower Protection (2019/1937)**
- **EU Anti-Money Laundering Directives (AMLD 4, 5, 6)**
- **OECD Guidelines on Corporate Governance**

### 2.3 Africa

- **African Union Convention on Preventing and Combating Corruption**
- **Common Market for Eastern and Southern Africa (COMESA) Competition Regulations**
- **Nigeria's Money Laundering (Prohibition) Act**
- **South Africa's Protection of Personal Information Act (POPIA)**

## 2.4 Asia

- **China's Anti-Unfair Competition Law (AUCL) and Cybersecurity Law**
- **India's Prevention of Corruption Act & Information Technology Act**
- **Japan's Financial Instruments and Exchange Act**
- **Singapore's Personal Data Protection Act (PDPA)**

## 2.5 The Americas

- **United States Foreign Corrupt Practices Act (FCPA)**
- **U.S. Sarbanes-Oxley Act (SOX) and Dodd-Frank Act**
- **Brazil's Clean Companies Act (Lei Anticorrupção)**
- **Canada's Corruption of Foreign Public Officials Act (CFPOA)**

## 3. Ethical Business Practices

### 3.1 Anti-Bribery & Corruption

- MUTTAHIDAH FZE maintains a **zero-tolerance policy** towards bribery and corruption.
- No employee, contractor, or partner may offer, solicit, or accept bribes, kickbacks, or facilitation payments.
- **Gifts and hospitality** must be reported if they exceed local regulatory thresholds.
- **Whistleblower protections** ensure that individuals reporting corruption are safeguarded.

### 3.2 Conflict of Interest

- Employees must disclose any situation where personal interests conflict with company interests.
- Board members and senior executives must complete an **annual conflict of interest disclosure**.

### 3.3 Fair Competition & Anti-Trust Laws

- Price-fixing, bid-rigging, and monopolistic behavior are strictly prohibited.
- We comply with **UAE Competition Law, EU Competition Laws, and U.S. Sherman Act**.

## 4. Data Privacy & Confidentiality

- **GDPR (EU), UAE Data Protection Law, China's Data Security Law, and U.S. CCPA** apply to all data processing activities.
- Employees must handle personal and corporate data with the highest confidentiality standards.
- Any data breach must be reported within **72 hours** to the Data Protection Officer.

## 5. Employment & Labor Standards

- MUTTAHIDAH FZE enforces compliance with **ILO labor standards** and **UAE Labor Laws**.
- **Child labor, forced labor, and discrimination** are strictly prohibited.
- **Equal pay and diversity policies** are applied globally.

## 6. Health, Safety & Environmental Standards (HSE)

- Compliance with **ISO 45001 (Occupational Health & Safety)**, **ISO 14001 (Environmental Management)**.
- **Sustainability commitment** under **UAE Vision 2030** and **UN Sustainable Development Goals (SDGs)**.

## 7. Anti-Money Laundering (AML) & Financial Integrity

- Adherence to **UAE AML Laws**, **EU AML Directives**, **FATF Recommendations**, and **U.S. Patriot Act**.
- Employees must undergo **annual AML training**.

## 8. Use of Company Assets & Intellectual Property

- Protection of **trade secrets, patents, copyrights, and trademarks** is mandatory.
- Company IT assets must be used only for legitimate business purposes.

## 9. Insider Trading & Financial Reporting

- Employees must not use non-public company information for **personal gain**.
- Financial records must be maintained in accordance with **International Financial Reporting Standards (IFRS)** and **U.S. GAAP**.

## 10. Compliance & Whistleblowing

- Employees must report any violations via the **whistleblower hotline**.
- Reports will be investigated confidentially and without retaliation.

## 11. Training & Implementation

- **Mandatory compliance training** for all employees annually.
- **Regional compliance officers** appointed for UAE, EMEA, Africa, Asia, and the Americas.

## 12. Conclusion

This Code is the foundation of our company's ethical and compliance framework. All employees and stakeholders must commit to upholding these principles to maintain our integrity and success globally.

### Contact Information:

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