

POLY CHEM

CODE OF **BUSINESS CONDUCT**



بولىشيم الشرق الاوسط ذ.م.م
POLYCHEM MIDDLE EAST L.L.C

The One Stop Shop For Composite Solutions

www.polychemme.com

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Message from the **Chairman**



At Polychem Middle East LLC, our growth and achievements are built on a strong foundation of integrity, respect, and ethical business conduct. Our reputation as a trusted leader in industrial solutions is directly linked to how we behave individually and collectively. This Code of Business Conduct is a reflection of our shared values and a guide to help us make the right decisions every day. Let us uphold the principles of this Code and ensure we protect the legacy and future of our company.

-C.V. Abdul Salam

Message from the **Managing Partner**



Integrity is the heartbeat of Polychem. In everything we do—whether developing cutting-edge composite materials, managing partner relationships, or ensuring sustainability—our values lead the way. This Code of Business Conduct reinforces our commitment to legal and ethical standards and acts as a compass for all of us. I encourage every employee, contractor, and stakeholder to read this Code thoroughly and live by its guidelines in all business interactions.

-Santhosh Ketteth



How we Work with Integrity

Complying with **Laws, Rules & Regulations**

We operate in compliance with all applicable laws, including environmental, labor, trade, and anti-corruption regulations. Ignorance of the law is not an excuse, and everyone is responsible for understanding and adhering to legal and regulatory requirements relevant to their role.

Anti-Bribery & Anti-Corruption

We have zero tolerance for bribery or corruption. No employee may offer, give, solicit, or accept a bribe or kickback. Any form of influence through improper payments is strictly forbidden, regardless of local customs or expectations.

Conflicts of Interest

Employees must avoid situations where personal interests could interfere with their duties. All potential conflicts must be disclosed promptly.

Executives and directors must take particular care to avoid conflicts that could harm company interests or appear inappropriate. Transparency is critical.

Gifts

Small gifts of nominal value may be accepted if they do not influence decision-making. Lavish gifts or entertainment that appear excessive or tied to business favors are not permitted.

Family Members

Decisions affecting hiring, promotions, or business contracts involving relatives must be handled objectively and disclosed.

Outside Employment

Secondary jobs must not interfere with performance at Polychem or create conflicts of interest.

Speaking Fees

Employees must receive approval before accepting compensation for public speaking engagements related to Polychem's business.



FREE & FAIR COMPETITION

We compete vigorously but fairly. Anti-competitive behavior, price fixing, bid rigging, or market division agreements are illegal and unethical.

Fair Dealing & Competitive Intelligence

We must always act with fairness and honesty. Gathering competitive intelligence is acceptable only through ethical and legal means.

Corporate Opportunities

Employees may not exploit business opportunities discovered through their role at Polychem for personal gain.

ENVIRONMENT & SUSTAINABILITY

Sustainability is a core value. We seek to minimize our environmental footprint, comply with environmental laws, reduce waste, and develop eco-friendly products and practices.

Board Service

Employees must obtain approval before accepting board positions in other companies, especially those that could lead to conflicts of interest.



How we Work with Each Other

Polychem prohibits discrimination based on race, gender, religion, nationality, age, disability, or any other protected characteristic.

We maintain a zero-tolerance policy on harassment, including sexual harassment, bullying, and intimidation. All employees deserve a respectful workplace.

Safety

We are committed to providing a safe workplace. All employees must follow safety protocols and report hazards or incidents immediately.

Workplace Violence

Threats or acts of violence, including verbal abuse, physical altercations, or intimidation, will result in disciplinary action.

Illegal Substances & Alcohol

The use, possession, or distribution of illegal substances in the workplace is strictly prohibited. Alcohol is only permitted at approved company events in moderation.

Personnel Information

Confidential personnel data must be protected and only accessed by authorized personnel.

REPORTING POTENTIAL MISCONDUCT & CODE-RELATED CONCERNS

Polychem encourages employees to report unethical behavior or violations of this Code. Reports may be made confidentially and without fear of retaliation.

Non-Retaliation

We do not tolerate retaliation against employees who report concerns in good faith.

Disciplinary Actions

Violations of this Code may result in corrective action, including termination and legal consequences.



How we Protect Our Assets

Data Protection & Privacy

We protect the personal and business data entrusted to us. All employees must follow data protection laws and internal policies.

What is PII?

Personally Identifiable Information (PII) includes names, identification numbers, email addresses, phone numbers, and other data that can identify a person.

Confidentiality

Sensitive business information must remain confidential and only be shared with authorized individuals.

Electronic Communications

Limited personal use of company email and internet is allowed but must not interfere with work or violate policies.

Email & Instant Messaging

Communications must be professional. Avoid inappropriate or offensive content.

Social Media

Posts about Polychem must not disclose confidential information or harm the company's image. Use good judgment and respect privacy and branding policies.

Physical Assets

Company resources such as computers, tools, and facilities must be used responsibly and safeguarded against damage or theft.

Product Samples

Samples are for business use only. Unauthorized distribution or misuse is prohibited.

Information Systems

Employees must protect company systems from unauthorized access, cyber threats, and data breaches.

Software & Network Security

Only approved software may be installed. Employees must follow IT security protocols and report vulnerabilities.

Records Management

Maintain accurate and timely records. Do not alter or destroy documents to avoid scrutiny.

How we **Work With Money**

Corporate Credit Cards

Company cards must be used only for approved business expenses. Misuse may result in revocation or disciplinary action.

Travel & Entertainment / Expenses

Employees must follow travel and expense policies. Submissions must be accurate and properly documented.

Accounting Practices

We adhere to international accounting standards and maintain accurate financial records.

Public Filings & Reports

Our public communications and financial filings must be complete, fair, and timely.

Insider Trading

Buying or selling securities based on non-public information is illegal and forbidden.

Investing in Businesses That Compete or Work with Polychem

Employees must disclose investments in companies that do business with or compete with Polychem to ensure transparency.

Loans

Personal loans to or from company stakeholders must be approved and comply with policy.

Signature Authorization

Only authorized employees may commit Polychem to contracts or expenditures.



How we **Work With Others**

Suppliers

Suppliers must meet our ethical, legal, and quality standards. We choose vendors based on merit and integrity.

Consultants, Independent Contractors & Other Service Providers

We hold all external partners to the same standards we apply internally.

Financial Disclosures & Communications

All communications with stakeholders must be accurate and consistent with Polychem's reporting standards.

Media Relations

Only authorized personnel may speak to the media. All inquiries must be referred to our communications team.

Political Contributions, Activities & Lobbying

Employees may engage in personal political activity but may not use company resources or affiliations for political purposes without approval.

Ethics & Compliance Reportline

Employees can report issues through our ethics hotline or designated compliance channels, anonymously if preferred.

WAIVERS AND AMENDMENTS

Waivers of the Code

Any waiver of this Code for executive officers or directors must be approved by the Board of Directors and disclosed where required by law.

Amendments to the Code

Polychem may amend this Code as needed to reflect changes in law, policy, or business practices. All updates will be communicated clearly.

CONTACT DETAILS

For any questions, concerns, or to report a potential violation of this Code, please contact:

Polychem Middle East LLC

Polychem Building, Jurf-2, Ajman, United Arab Emirates

Telephone: +971 67 434 634

Mobile: +971 50 631 7912

Email: sales@polychem.ae, p_chem@emirates.net.ae

**This Code is more than a set of rules - it's a reflection of who we are. Thank you for upholding the values of Polychem Middle East LLC in everything you do.*

***All communications will be handled with discretion, and reports may be made anonymously where allowed.*