

# CODE OF CONDUCT

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POLICIES & PROCEDURES

GMG 2023

GMG

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# GMG SPIRIT

## OUR MISSION, VISION AND VALUES

At GMG, our vision is to inspire people to win in ways that make the world a better place. Our mission supports this because we dare ourselves and others to develop better products and experiences that change lives.

We aim to change and improve people's lives through active living, nutritious food and good health. We do this through our leading international and home-grown brands that are part of our five divisions which include Sports, Everyday Goods, Health and Beauty, Properties, and Logistics.

To ensure we get there, we live by and follow a set of core values and behaviours.



### ONE FAMILY

We are united by one purpose: we play to win, and we win together. We explore untapped opportunities that bring us out on top, while acting with ownership and integrity. We are one heartbeat - One Family.



### SIMPLE IS SMART

We cut to the core of what matters and make proactive decisions to find smart solutions. Because we have a winning attitude, we make things happen and deliver every single time.



### KEEP EVOLVING

We are pioneers, leading the way for the evolution of our industry. Winning is our attitude. We are obsessed with progress and continue to push ourselves beyond what is possible.



### CONSUMER FIRST

We are obsessed with our consumers. We know them inside and out and constantly go above and beyond for them with everything we do, no matter what. We are always evolving to exceed our consumers' expectations.



### BE THE CHANGE

We are the change. Every challenge we face is an opportunity to grow and take ourselves as well as our consumers to new heights. We are self-starters and the drivers of our own destiny.

**WE BELIEVE IN BRINGING OUR CORE VALUES TO LIFE WITH EVERYTHING WE DO.**

# A MESSAGE FROM OUR CEO

Dear GMG Family,

I am delighted to share with you our new GMG Code of Conduct. As we strive to expand and grow our business, it is essential that we maintain the highest standards of integrity and professionalism in all our daily operations. Therefore, this Code will act as our guiding principle for conducting business and how we interact with each other.

Our values are the bedrock of our corporate culture, and they act as a guiding compass to our relationships with all our stakeholders, including our employees, consumers, partners, government entities, and the larger community. At GMG, these values are embodied in our Code of Conduct, which serves as the basis for all our company policies and procedures.

We are committed to upholding these values and standards of behaviour in all our roles. The commitments outlined in our Code of Conduct have been adopted by the entire GMG family, including our leaders, and all our brands.

By adhering to these commitments, we ensure that we maintain the trust of our stakeholders and continue to build a culture of excellence and accountability at GMG. I am proud of the dedication and hard work that has gone into developing this approach, and I am confident that we will all work together to uphold these high standards.

Thank you for your continued commitment to our company and our values.

**MOHAMMAD A. BAKER**  
DEPUTY CHAIRMAN & CEO



# INTRODUCING THE GMG CODE OF CONDUCT

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Welcome to the GMG Code of Conduct. This document outlines how all GMG employees should act, behave and conduct themselves at work. We believe that creating a positive, healthy and respectful work environment is important, and everyone at GMG plays a vital role in achieving this goal.

Our Code of Conduct applies to everyone associated with GMG. We believe in conducting business with the highest ethical values and are committed to attracting, developing, and retaining the best talent. We challenge our employees to fulfil their potential and promote from within, creating a culture of mentorship and empowerment.

As a global company operating in 12 countries, with over 70 nationalities, we understand the importance of being sensitive to actions and behaviours that may be acceptable in one culture but not another. GMG is committed to protecting the basic human rights of all people who work within our business and supply chain, in accordance with local laws and regulations.

We expect all employees, including third-party contracted employees, to follow these standards and comply with the local labour laws and the GMG Code of Conduct. By adhering to these standards, we can create a culture of collaboration, support, and respect for everyone in our One Family.

# OUR PURPOSE

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Our purpose is to conduct business with integrity and professionalism, which is guided by our Code of Conduct. It outlines the core standards of behaviour that our stakeholders can expect from us. By upholding these standards, we create a positive and respectful work environment that promotes well-being for all.



## YOUR ROLE

As a valued member of the GMG team, we know that you're committed to upholding the highest standards of integrity and professionalism. Our Code of Conduct is here to support you in that effort. It outlines the core values and behaviours that we expect from all of our employees and helps create a positive and respectful work environment.

We trust that you'll act with honesty and integrity in all of your interactions with all stakeholders, reflecting positively on yourself and the company as a whole. If you're ever unsure of the right course of action, don't hesitate to seek guidance.

Together, we can **KEEP EVOLVING to build a culture of compliance, trust, and accountability** that benefits everyone. Thanks for being a part of the team!



## RAISING CONCERNS AND REPORTING INCIDENTS

At GMG, we are committed to maintaining a culture of openness and transparency. If you need to raise any concerns or grievances, we have a clear and confidential process in place to help you do so.

If you experience any known, suspected, or attempted violations of the GMG Code of Conduct, we encourage you to come forward and express your concerns. Your concerns will be taken seriously and treated with the utmost confidentiality.

To raise a concern or a violation, or to report an incident, you should contact your line manager directly, **unless the concern is related to matters listed under gross misconduct (see the next section)**. Your line manager will provide guidance, support and will work with you to resolve the issue.

If you are unable to speak to your line manager, you should contact your designated HR Business Partner (HRBP). The HRBP will listen to your concerns, provide guidance on the next steps, and will work with you to resolve the issue.

By raising your concerns and by raising them early on, you are helping us to create and maintain a positive and respectful work environment that upholds our Code of Conduct. We value your input and appreciate your commitment to upholding our standards.



## MISCONDUCT AND GROSS MISCONDUCT

At GMG, we encourage and foster a positive, inclusive work environment and a strong culture of ethics. Our success depends on our people –you, doing the right thing. No matter our job title, we are all leaders when it comes to ethics and integrity.

Anyone who violates our Code, GMG policies, standards and procedures, or the law will be subject to disciplinary actions, up to and including legal consequences, suspension and termination of employment –unless stated otherwise by local laws.

Misconduct is defined as any unethical or unprofessional behaviour that an employee engages in.

Gross Misconduct is any serious violations which may warrant immediate termination of employment include, but are not limited to:

1. Discrimination and/or harassment;
2. Sexual Harassment;
3. Violation of consumer policies or procedures while on consumer site
4. Fraud in all its forms (includes fraud related in eCommerce and waste procedures);
5. False statements including those on Curriculum Vitae, resume or employment application, expense report, timesheets, statements given during an investigation or other Company records;

6. Theft or wilful destruction of Company property or the property of others;
7. Accessing pornographic or adult content materials and/or web sites via Company computers;
8. Divulging any confidential, personal or private information about an employee or unauthorised disclosure of the Company's confidential or proprietary information;
9. Retaliation against any employee who reports a violation of Company policy or who participates in an investigation of misconduct;
10. Bribery and Corruption;
11. Violation of the local Laws;
12. Engaging in sabotage or espionage;
13. Failure to report misconduct or violations in accordance with Company policies;
14. Violation and non – compliance of company's policies on:
  - a. Unauthorised Bulk Sales;
  - b. Violation of item clearance procedures;
  - c. Food Safety and Hygiene;



If you witness or experience any behaviour that falls under Gross Misconduct, that affects GMG, its clients, suppliers, employees, partners, or the public interest, you should report it using our confidential Help Center channel. You can simply send an email to [Ethics@gmg.com](mailto:Ethics@gmg.com), or call the Ethics Help Center.

## WHAT HAPPENS NEXT?

1. All disclosures will be thoroughly investigated following our Grievance and discipline Policy.
2. If the issue is not defined in the DOT, the GMG ethics panel will make a decision based on the investigation report.
3. As the employee making the disclosure, you will be protected from victimisation, harassment, or disciplinary action resulting from your report.



### EXAMPLE SCENARIO - WORKPLACE ETHICS AND REPORTING MISCONDUCT:

You suspect that a co-worker or manager has violated GMG's ethical policies or engaged in inappropriate behaviour.

**WHAT YOU SHOULD DO:** If you suspect someone has violated GMG's ethical policies, you have a responsibility to report it. At GMG we encourage you to take an action that you feel comfortable with. You can choose to:

- Speak directly to your line manager
- Report it to your HRBP
- [Call the Ethics Help Center](#)



## INTERACTING IN THE WORKPLACE – HOW WE TREAT EACH OTHER

### LEADING BY EXAMPLE

At GMG, we believe in the power of leading by example. As an employee, you have the opportunity to **BE THE CHANGE**, and be a positive influence on your colleagues – helping to shape a culture of integrity and professionalism. If you are in a leadership role, it is especially important that you lead by example and ensure that your team members understand and follow our Code of Conduct. We want everyone to understand that acting with integrity is not just about reading a set of policies, but about practicing them and striving to behave in an ethical way, in every situation and circumstance. If you ever have any doubts or questions, please don't hesitate to seek guidance from your Human Resources Business Partner (HRBP) - we are here to help.



### ACT WITH OBJECTIVITY

At GMG, we are committed to making sound decisions regarding our people, assets, and resources, and taking responsibility for our actions. However, there may be times when we encounter situations that are unclear or have personal or emotional elements to it. In these instances, making an objective decision can be challenging. To assist you in making the right choice, we suggest following this decision-making process:

- ▶ Is it in compliance with the law?
- ▶ Does it align with GMG's values and Code of Conduct?
- ▶ Will I be accountable for my decision?
- ▶ Would the decision be acceptable if it became public?
- ▶ Does this decision align with our company's mission and goals?
- ▶ Have I sought guidance from relevant colleagues or experts to ensure I am making an informed decision?
- ▶ What are the potential consequences of this decision, both positive and negative, and how do they compare to alternative options?

By considering these questions, we can ensure that our decisions are ethical, responsible, and in line with our values as an organisation.

### ACT WITH ETHICS AND INTEGRITY

At GMG, we live by the core principle of One Family. We are united by one purpose, that is - we play to win, and we win together. Our values are the foundation of our success, and we expect everyone to act ethically and with integrity when making business decisions. Acting with ethics and integrity is essential for building a culture of trust, respect, and accountability within our own teams and the wider GMG family. As members of the GMG family, we rely on each other to lead and inspire others to live by our values, protect our heritage, and preserve our reputation. Some examples of acting with integrity include:

- ▶ treating others with kindness, empathy and understanding
- ▶ taking responsibility for our own actions and holding ourselves accountable
- ▶ valuing diversity, equality and inclusion
- ▶ respecting individual strengths
- ▶ dealing with conflict in a professional manner

It is up to all of us to act with integrity, hold each other accountable and maintain our commitment to these values when representing GMG in any situation. This will create a positive and healthy work environment for all.

## EMBRACE DIVERSITY, EQUALITY, AND INCLUSION

Diversity, equality, and inclusion are at the core of our values and our transformation strategy – this is what makes us unique. We celebrate our differences and recognise that diversity is one of our key strengths. We believe that a diverse, equal, and inclusive culture at GMG is critical to our growth and transformation. We believe that when we embrace diversity, we thrive together.

**WHAT DOES DIVERSITY MEAN?** For us, a diverse workplace is all about creating an inclusive environment that provides equal rights and opportunities for everyone, regardless of their differences. It's about recognising, respecting and valuing others opinions, and lifestyles that differ from our own, and making others feel included.

Diversity provides us with new opportunities for individual and collective growth, fosters greater creativity, and strengthens our agility to adapt to rapidly changing business environments.

**WHAT DOES EQUALITY MEAN?** Equality is all about treating each employee equally and fairly. It's creating an inclusive work environment where employees feel valued, secure and happy. It's removing any form or chances of discrimination in the workplace and ensuring that people are treated fairly, given equal opportunities and are accepted for their differences.

**WHAT ABOUT INCLUSION?** Inclusion is where people's differences are valued and used to enable everyone to work together and thrive. An inclusive working environment is where everyone feels like they belong, where their contributions matter, and where they can perform to their full potential, regardless of their background, identity, or circumstances.

The purpose of this Code of Conduct is to promote diversity, equality and inclusivity in our workforce. It outlines the necessary steps to ensure that no employee faces discrimination during the selection process or their employment.

At GMG, we strive to:

- ▶ Respect, accept, and support employees of all ages, genders, and backgrounds in fulfilling their responsibilities and achieving their full potential.
- ▶ Create a workplace environment that is welcoming, safe, and accepting of all employees, regardless of their age, gender, ethnicity, nationality, or religion.
- ▶ Uphold GMG as a diverse and inclusive organisation that values and respects every individual, free from discrimination.



## CASE STUDY

**EXAMPLE SCENARIO:** You receive a negative comment on your religion or personal beliefs.

**WHAT YOU SHOULD DO:** Discrimination in any form goes against our GMG values. If you find yourself in this scenario, at GMG we encourage you to take an action that you feel comfortable with. You can choose to:

- ◉ Speak directly to your line manager
- ◉ Report it to your HRBP
- ◉ [Call the Ethics Help Center](#)



We encourage you to speak up and seek assistance if you feel that you have been subjected to any form of discrimination.

## HARASSMENT AND BULLYING

Harassment or bullying are very similar behaviours that cause harm, distress or intimidation to another person. This can cause serious consequences for the well-being and productivity of individuals or teams.

At GMG, we are dedicated to fostering a safe and respectful workplace where everyone can feel comfortable, happy and valued. We strive to promote an environment that is free from all forms of harassment and bullying.

Harassment and bullying can take many forms, such as:

- ▶ unwelcome remarks
- ▶ offensive gestures or physical contact
- ▶ derogatory comments or jokes
- ▶ verbal or physical abuse or threats



## CASE STUDIES

### CASE STUDY 1

**EXAMPLE SCENARIO:** As a manager, a team member you oversee has reported that they have been harassed by another employee on multiple occasions. You haven't reported the allegation as you do not believe it to be true. A question for you to consider - Is it a violation of the Code of Conduct to not report this allegation?

**WHAT YOU SHOULD DO:** As a manager, it is your responsibility to report any allegations of harassment or discrimination, regardless of whether you believe them to be true or not. The accuracy of the allegations will be assessed through an investigation process. By not reporting the violation, you would be violating the Code of Conduct.

### CASE STUDY 2

**EXAMPLE SCENARIO:** Your manager uses derogatory comments that you find intimidating and embarrassing, making you feel bullied and belittled.

**WHAT YOU SHOULD DO:** No one should feel frightened or intimidated at work. Bullying can take different forms, including subtle or obvious verbal or physical abuse. If you are experiencing workplace bullying, we urge you to speak up. You can speak directly to the person causing the behaviour or to your line manager.



In any case scenario, we encourage you to take an action that you feel comfortable with. You can choose to:

- Speak directly to your line manager
- Report it to your HRBP
- [Call the Ethics Help Center](#)

## SEXUAL HARASSMENT

Sexual harassment is defined as any unwelcome conduct of a sexual nature that might reasonably be expected or perceived to cause offense or humiliation. It can occur between persons of the same or different genders.

Examples of sexual harassment include:

- ▶ implied or explicit demands or requests for sexual favors
- ▶ sexual remarks or jokes
- ▶ showing pornography
- ▶ unwelcome physical contact
- ▶ verbal or non-verbal conduct of a sexual nature
- ▶ implied or explicit promise of preferential treatment in employment
- ▶ implied or explicit threats about present or future employment status

We take any form of sexual harassment seriously and encourage you to report it. We are committed to taking prompt and appropriate action to address any reported incidents and ensure a safe and respectful workplace for all.

 **CASE STUDIES**

### CASE STUDY 1

**EXAMPLE SCENARIO:** In the workplace, is it appropriate to share stereotypical or sexual jokes with colleagues, suppliers, or consumers?

**WHAT YOU SHOULD DO:** It is important to create a respectful and welcoming environment for everyone. Offensive material should not be shared or discussed in the workplace. If you witness any inappropriate behaviour, please speak up and address it with the colleague involved.

### CASE STUDY 2

**EXAMPLE SCENARIO:** You have observed one of your colleagues harassing another colleague, but he/she has not reported the incident.

**WHAT YOU SHOULD DO:** Harassment of any nature is against GMG's values, and you should not be a bystander when confronted with inappropriate behaviour. Speak to your colleague about the situation and encourage them to report the incident.



In any case scenario, we encourage you to take an action that you feel comfortable with. You can choose to:

- ⦿ Speak directly to your line manager
- ⦿ Report it to your HRBP
- ⦿ [Call the Ethics Help Center](#)



## SUMMARY

If you find yourself in a situation where you are offended by, or concerned about, a person's behaviour, we encourage you to speak up and explain why you find it offensive and ask them to stop. Often, these instances can be addressed by directly speaking to the person and helping them understand why their actions or behaviours are causing offense. It's also important to be mindful of local behaviours, practices, and customs so you can adapt your behaviours accordingly.

## CREATING A SAFE AND HEALTHY WORK ENVIRONMENT

### SAFE WORK ENVIRONMENT

At GMG, we are committed to providing a healthy, safe and respectful work environment for all our employees, visitors and consumers. Our labour practices ensure the protection of labour standards, and we do not compromise on ensuring a healthy and injury-free workplace for our colleagues and consumers.

We believe that a healthy employee is a happy employee – which creates a happy and healthy workforce. We advise you to read our health and safety policies and procedures.

### TREATING THIRD-PARTY EMPLOYEES FAIRLY

At GMG, we value the same standards and values for our third-party contracted employees as we set in place for our own contracted employees. Everyone must be treated fairly to create a safe working environment. This also means our third-party contracted employees are expected to comply with local labour laws and the GMG Code of Conduct.

### SUBSTANCE ABUSE

At GMG, consumption of alcohol or any illegal substances in the workplace is not allowed. We want to ensure a healthy and safe working environment for all, and you should be performing your duties free from the influence of any substance that could weaken your performance. Possessing, using, selling, or transferring illegal drugs, narcotics, medically unauthorised drugs, or controlled substances is considered a serious offense that can result in dismissal without notice. Reporting to work under the influence of any substance including alcohol or narcotics, is prohibited.



# DOING BUSINESS THE RIGHT WAY

Our key values of integrity and fairness are central to our business growth around the world. We are all expected to adopt and practice the GMG values and use our best judgment to make good decisions every day. When faced with difficult decisions, we encourage seeking help and using our best judgment to make the right choice. By doing so, we uphold the reputation of our company, which is crucial to our success. We all play a role in protecting our company. The power of our brand depends on our reputation.





## FAIR BUSINESS PRACTICES

At GMG, we understand that everyone benefits from a competitive marketplace. We believe in fair competition and avoid any actions that may appear to limit another company's ability to compete against us. We comply with local laws and regulations in all the regions we operate in, and actively support fair business competition.

## CONFLICT OF INTEREST

We value transparency in all our business dealings. While building relationships with external businesses and partners is common, it is important to avoid situations where those relationships may interfere with your ability to make unbiased, objective decisions and act in the best interest of GMG.

A conflict of interest occurs when a personal activity or interest interferes or is perceived to interfere with your role at GMG.

These types of personal activities or interests may influence your judgment or decision making without you even noticing, and they might raise questions about your integrity by others.

By avoiding conflicts of interest and disclosing potential areas of conflict, we demonstrate our commitment to and support of GMG's strong ethical culture.

## WHAT MAY BE CONSIDERED AS A CONFLICT OF INTEREST?

- ▶ Conducting business with an organisation that competes with GMG's portfolio of products.
- ▶ Holding an additional employment with an organisation that would like to do business with GMG.
- ▶ Hiring, promoting or carrying out business practices with someone whom you have a close relationship with.

Being honest and open is important, and a potential conflict of interest can often be resolved with a simple discussion. Remember that having a conflict of interest is not necessarily a violation of the Code of Conduct, however not disclosing it is.





## BRIBERY AND CORRUPTION

At GMG, we are committed to upholding fair and ethical business practices. This means that we do not engage in any form of corruption, and we never offer or accept anything of value in order to get business, keep business or to gain an unfair advantage. It's important to understand that bribery and corruption can take many forms, such as cash or gifts to individuals, inflated commissions, fake consultancy agreements, unauthorised rebates, and political or charitable donations.

To ensure compliance with anti-corruption laws in the countries where we operate, it is illegal to offer, promise, give, or accept anything of value that could corruptly influence a decision, or to gain the following advantages:

- ▶ a business benefit or compensation
- ▶ to retain business practices
- ▶ to carry out an unlawful act or to act inappropriately that demeans the reputation of GMG
- ▶ to influence a decision with a person of conflict

We abide by all applicable anti-corruption and money laundering laws, and we understand that failure to do so can result in severe criminal penalties for both the bribe giver and receiver, which could adversely affect GMG's business.



## CASE STUDY

**EXAMPLE SCENARIO:** You are in the middle of negotiating a big contract with a brand, and the brand representative offered you a VIP ticket to a major sports event. Is it fine to accept it?

**WHAT YOU SHOULD DO:** You should not accept the tickets. Accepting anything of monetary value for personal gain– including event tickets, gifts, excessive meals, or hospitality while negotiating a contract creates a potential conflict of interest and could also violate our Code of Conduct. When you are unsure on how to proceed on a potentially delicate situation, we encourage you to take an action that you feel comfortable with.



It is crucial to report any concerns about bribery or facilitation payments. At GMG we encourage you to take an action that you feel comfortable with. You can choose to:

- Speak directly to your line manager
- Report it to your HRBP
- [Call the Ethics Help Center](#)



## GIFTS AND HOSPITALITY

In our industry, it is common practice to exchange gifts and hospitality with current and potential business partners. Exchanging business courtesies in this manner helps us strengthen our relationships with external parties. However, it is essential to practice good personal judgment and adhere to our [Gift and Hospitality policy](#). When offering or accepting gifts and business courtesies, there are several factors we need to keep in mind such as the value of the gift, the frequency and timing.

It is prohibited to exchange gifts or hospitality if it compromises professional judgment, creates a conflict of interest, constitutes bribery, creates a sense of obligation, or is illegal in the country where it occurs.

If you plan to give or receive a gift or benefit, discuss it with your line manager, the Legal department, or the Audit and Assurance team beforehand.

GMG reserves the right to confiscate any gift deemed inappropriate, and cash gifts are strictly prohibited. Remember, gifts and hospitality should only be accepted or given if they adhere to our policy.

### CASE STUDY

**EXAMPLE SCENARIO:** You received a gift from a business partner that you should not accept.

**WHAT YOU SHOULD DO:** Return the gift politely to the business partner referring to the GMG Code of Conduct. If the gift is something perishable, like flowers or a food basket, where returning it is not an option, place it in a common area in the office where it can be enjoyed by everyone.



If you are in a situation where you must accept a gift or receive one unexpectedly, please notify your line manager immediately and refer to the Gift Hospitality and Entertainment policy. You can choose to:

- Speak directly to your line manager
- Report it to your HRBP
- [Call the Ethics Help Center](#)

For more information, please refer to our Gifts and Hospitality policy.



## BUSINESS PARTNERS

Our Business Partners are an essential part of our growth and success, globally. As an international organisation, our partners represent our brands in global markets and uphold the name and standards of GMG. As such, our business partners are an extension of the GMG family, which means any illegal activity they may carry out while conducting business for or representing GMG can create a liability for GMG.

Our aim at GMG is to ensure a healthy and long-lasting relationship with our business partners and treat them fairly and with integrity. We commit to maintaining the highest standards of integrity and ethics and instill the same in our business partners. We do this by integrating ethical, social, and environmental criteria in our Supplier Code of Conduct.

### WE WILL:

- ▶ select our business partners with a fair, objective, and impartial process, in accordance with our policies
- ▶ respect our business partners code of conduct and ethical expectations
- ▶ support our business partners in meeting our standards

### WE WONT:

- ▶ initiate or terminate a business partnership at the request of another supplier or business partner
- ▶ offer or accept favors from an individual or organisation that is in a business relationship with GMG

## BUSINESS RELATIONSHIPS AND FAIR COMPETITION

At GMG, we take our responsibility to comply with all competition and antitrust laws and regulations seriously. As One Family, we believe in treating each other with respect and equality, regardless of job title or position. As an employee of GMG, you also share the responsibility of upholding our values and conducting business with honesty and integrity.

Our company does not engage in any practices that could be considered antitrust or monopolistic, including the creation of barriers or the prevention of competition. Additionally, we avoid any unfair or unethical business practices, anti-competitive mergers, and price-fixing.

You can help us maintain our commitment to ethical business practices by remaining vigilant for any signs of wrongdoing by employees or related parties.



If you find yourself in a situation where sensitive commercial information is being discussed, please conclude the conversation by referring to the GMG Code of Conduct and reporting the incident. We encourage you to take an action that you feel comfortable with. You can choose to:

- ◉ Speak directly to your line manager
- ◉ Report it to your HRBP
- ◉ [Call the Ethics Help Center](#)



## EMPLOYMENT OUTSIDE GMG

While working at GMG, you should not directly or indirectly work with, or take part in an assignment for one of GMG’s competitors, or any other party that could potentially impact your performance, or your judgment at GMG.

When it comes to being a part of a Non-Governmental Organisation, a government agency, or being asked to serve on a Board of Directors or similar, if you are part of the Directorship, you must first obtain approval from the Ethics Committee.



**EXAMPLE SCENARIO:** You have been invited to serve on the advisory board of a Non-Governmental Organisation you’re passionate about. Should you accept?

**WHAT YOU SHOULD DO:** It depends on the role and responsibility. You should avoid any potential conflict of interest, complaints, or perceptions of favouritism. For those members of the directorship, it is best to obtain approval from the Ethics Committee.

## PRODUCT SAFETY AND QUALITY

At GMG, we believe in the quality of our products and services. We aim to constantly deliver the highest value to our consumers by always putting them first. As such, we are continuously working to improve our standards when it comes to the quality of our products.

We are committed to making a difference by developing and promoting products that enhance the well-being of our consumers. We assure quality from the very beginning. Whether it be how we source our ingredients, or when the finished product reaches our consumer. At GMG, we aim to do the following listed below.

- ▶ Comply with all legal and regulatory requirements in the countries we operate.
- ▶ Ensure the highest standards of hygiene and strict quality controls are implemented from product development through to the manufacturing and distribution process.
- ▶ Have an open dialogue with our consumers to avoid any potential health and safety concerns.



If you have any concerns with an aspect of GMG’s sourcing, including procurement, development, manufacturing, handling or how we store our products, please let us know. We encourage you to take an action that you feel comfortable with. You can choose to:

- ⦿ [Speak directly to your line manager](#)
- ⦿ [Report it to your HRBP](#)
- ⦿ [Call the Ethics Help Center](#)

## HONOURING COMPANY ASSETS

### CONFIDENTIALITY

GMG is constantly developing innovative products to build our Company's competitive advantage. To accomplish that, we rely on our Company's confidential information, which is one of its most valuable assets. We respect the privacy rights of our consumers, employees, and partners, and we recognise the importance of protecting the information collected from them. We have adopted a corporate-wide Privacy Policy, that guides how we collect, store, and use the information we acquire.

### WHAT YOU SHOULD KNOW


Confidential information includes but is not limited to business plans, agreements, employee and consumer information, financial information, and other general business operations and performance data. Any unauthorised use of this information is illegal and may result in legal consequences. Therefore, it is essential that you always follow our confidentiality policy and obtain appropriate approvals before sharing or storing any confidential information.

If you need to share confidential information with a third party as part of your role, make sure the party receiving the information has signed a non-disclosure agreement. Similarly, if you receive confidential information from a third party, you can only use it within the predetermined terms of a written agreement with them.


### DATA PRIVACY - PERSONAL INFORMATION

To protect each employee within GMG, we safeguard the collection, storage, and processing of personal data. All official records, information, and emails belong to GMG as assets and resources. If you require access to this information, it should only be for authorised purposes, in accordance with applicable legal and data privacy law requirements. It is essential to always get permission before collecting, using, or disclosing information. Those of us with access to personal information must safeguard it, use it lawfully and properly, and never share it with anyone who does not need to know it or is not authorised to receive it.

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 If you have any questions or concerns about our policies or procedures, please contact our Audit and Assurance team or the Ethics Help Center.

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 If you are unsure about whether certain information is confidential, please contact our Audit and Assurance team or the Ethics Help Center.

### CASE STUDY

**EXAMPLE SCENARIO:** During your annual leave, your co-worker requests access to the GMG system to complete an urgent task. Should you give them your login details?

**WHAT YOU SHOULD DO:** You should never share your login details with anyone. In this case, we advise that you contact your line manager, who has access to the system and will be able to share the required information.



## ASSETS PROTECTION

GMG's assets, whether tangible or intangible, should only be used for business purposes and can only be used in line with the relevant laws and policies. The same applies for any of GMG's resources.

### OK, BUT WHAT ARE TANGIBLE AND INTANGIBLE ASSETS?

Tangible and intangible assets include but are not limited to, premises, equipment, documents, intellectual property, logos, computers, mobile phones, data, vehicles, products, patents and trademarks, and employees' time at work. Employees are held accountable for how they use assets, and as such, they must be used appropriately.

### PROTECTING GMG'S ASSETS

GMG's assets are essential to our company's success. No matter which assets we use or have access to as part of our work, our responsibilities to protect our assets are the same. Under no circumstances is it permitted to use GMG's assets for personal gain.

### HOW CAN WE PROTECT GMG'S ASSETS?

To safeguard GMG's assets, we should take proactive measures to protect electronic assets from loss, damage, theft, and any unauthorised use. Additionally, we should use the company's communication channels responsibly, including email, web-based applications, and accounts, and follow GMG's IT policies and procedures at all times. We should also follow GMG's instructions on cybersecurity.

### WHAT SHOULD WE AVOID DOING?

We should not use GMG's assets for illegal or unethical activities such as gambling, accessing or sending indecent materials, advocating violence, political views, or other offensive activities. We should not use samples received from suppliers for personal use or sell expired or damaged goods. It is also prohibited to use GMG's software to design items or garments for personal gain or overuse company phone and computer for personal reasons. Breaching GMG's policies or negatively affecting performance, productivity, or GMG's work environment is also not allowed.



To sum up, protecting GMG's assets is essential to our company's success. By following GMG's policies and taking proactive measures, we can ensure the safety and security of our assets, and avoid any illegal or unethical activities.

### EMPLOYEE DISCOUNTS AND BENEFITS

GMG rewards its employees for their motivation and engagement, and one of the ways we do this by offering employment benefits. Among these benefits are discounts that can be availed at GMG’s retail outlets.

However, whilst this is a great benefit, it’s important to know that misuse of our employee discount benefit, such as using it to purchase products for your own personal gain, or to increase sales and achieve targets, will lead to disciplinary action in line with the company’s policies and procedures.

Read more details about our [GMG Employment Discount Policy](#).

### REPORTING AND RECORD KEEPING

At GMG, we take our record keeping seriously. Accurate financial records are essential to making informed business decisions and avoiding legal and regulatory risks. Plus, it helps build our reputation and credibility.

As employees, we are responsible for spending GMG’s money appropriately and keeping our records clear, accurate, and complete. This includes financial and accounting records, business travel and entertainment expense records, work activity records, and any other records or purchases made on behalf of GMG. We should never falsify any record or account. Doing so will result in disciplinary actions.

When our finance, audit, and assurance team have questions, we expect everyone to cooperate fully by providing accurate, detailed, and complete documents in a timely manner. Remember, good record keeping is not just important for GMG’s success, it’s also our responsibility as employees.

### GMG’S IT ASSETS

Inappropriate use of GMG’s IT assets can result in an unauthorised breach of our network, damage to the network, unauthorised access to confidential data, and theft of confidential information. Therefore, all applicable IT policies and procedures should always be followed.



If you are ever in any doubt, or you are aware of the misuse of certain company assets, please get in touch with your line manager, or the Human Resources Department.



# REPRESENTING THE COMPANY

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## MEDIA MANAGEMENT

At GMG, we recognise the importance of effective communication, and we value transparency and honesty in all our interactions with the media. Communicating with the media on behalf of GMG can lead to misrepresentation of GMG. If you are approached by any media personnel, please refer them to our Brand, Culture and Sustainability Department (External Communications), for assistance. This includes but not limited, to discussing or sharing any company information on social media platforms or any public forums, which includes but is not limited to, Facebook, Twitter, Instagram, YouTube, and LinkedIn.

Remember, effective media management is crucial to safeguarding our company's reputation and integrity. If you require more information, please read the [Brand, Culture and Sustainability – External Communication Policy](#). Alternatively, if you have any questions or concerns, please reach out to the Brand, Culture and Sustainability Department (External Communications), for guidance.

## INTERNATIONAL TRADE SANCTIONS

At GMG, we believe in fair and ethical business practices. We strive to compete based on the quality of our products and services and avoid any conduct that may restrict fair trade. Engaging in certain business practices, such as price fixing or consumer allocation agreements with competitors, is not only unethical but also violates antitrust laws, and can lead to serious legal consequences.

As part of our commitment to ethical business practices, it's important that we comply with international trade sanctions. When importing products, always ensure that you accurately report the value, country of origin, and any other facts that may need to be reported to Customs authorities.



If you have any questions or doubts about applicable sanctions, please reach out to the Audit and Assurance team before taking any action. Let's continue to work fairly and passionately while upholding our commitment to ethical business practices.





## BEING A RESPONSIBLE CORPORATE CITIZEN

### CONTRIBUTION TO THE COMMUNITY

GMG is committed to being a responsible corporate citizen, and we believe in making a positive impact in the communities where we operate and serve. Our Corporate Social Responsibility (CSR) initiatives are focused on promoting healthy lifestyles and overall well-being in these communities.

We encourage our employees to get involved in charitable activities and volunteer work as a way to make a difference both personally and professionally. However, it's important to note that we must comply with local laws and regulations. As such, we ask that employees refrain from promoting their personal or political views while on GMG property or representing GMG in any way. We do not endorse or support any personal or political views expressed by our employees.

### SUSTAINABILITY

As we **KEEP EVOLVING**, we are incorporating sustainability into our business practices more frequently - starting from our logistics, operations, and partners to how we can inspire and innovate for our consumers, our community, and our environment.

We hold ourselves accountable for our own impact and are committed to protecting our environment, empowering our community, and encouraging sustainable practices wherever we can.

### MANAGERIAL ROLE AND RESPONSIBILITIES

We all play a key role in GMG's culture. But if you are a manager or supervisor, you have some additional responsibilities. We count on you to lead by example and to foster an environment that is positive, fair and inclusive.

- ▶ Set the tone and lead by example. Bring our GMG values to life in your daily life.
- ▶ Create an environment that encourages asking questions, raising concerns and speaking up.
- ▶ Listen and report concerns appropriately, escalating them as needed and keeping in mind GMG's escalation requirements.
- ▶ Ensure those who report to you complete their compliance training courses and certification to the Code of Conduct on time and practice GMG's core values.
- ▶ Do your part to create a fair and respectful workplace.





## RAISING CONCERNS AND SPEAKING UP

As One Family, we respect all employees and partners and encourage them to speak up for what is right when something is wrong.

Certain behaviours may be perceived as a breach of GMG's policies and procedures and the law. These behaviours may seem illegal or unethical and it is important that if you see or know of any misconduct, it is in your legal duty to report the issue. Please refer to the grievance and discipline policy.

If you find yourself in a situation where the right course of action is not clear, remember that you are not alone. GMG cares about the well-being of its people and provides multiple resources for advice and help when you need it - when you speak up, we listen. By asking questions and reporting potential problems, you are helping GMG succeed.

## WHOM SHOULD YOU SPEAK TO?

Always choose the reporting option you are most comfortable with.

- ▶ If you have an issue with a colleague or business partner, you should discuss it directly with them first, in a respectful and considerate manner.
- ▶ If that is not an option, you should speak to your supervisor or line manager.
- ▶ If it is inappropriate to discuss it or is highly confidential, then you should discuss the issue with Human Resource department.
- ▶ If it is not possible to talk to any of the above, report the matter through our GMG Ethics Help Center.
  - ▷ This is a safe space, and you can report incidents anonymously (*unless specified otherwise*), 24 hours a day, 7 days a week in your preferred language.



## LAWS AND REGULATIONS COMPLIANCE

At GMG, we are committed to complying with all applicable local laws and regulations. If any conflicts arise between this policy and local laws or regulations, the policy will be amended to comply with local laws and regulations. If you have any questions or concerns regarding local policies or potential conflicts of laws, we encourage you to take an action that you feel comfortable with. You can choose to:

- ▶ Speak directly to your line manager
- ▶ Report it to your HRBP
- ▶ Call the Ethics Help Center



## CASE STUDY

**EXAMPLE SCENARIO:** What to do if your line manager instructed you to do something against the law?

**WHAT YOU SHOULD DO:** If your line manager instructs you to do something that may be against the law or GMG policies, you should first have an open and respectful conversation with them about your concerns. If your line manager continues to insist, you should contact the Ethics Help Center for guidance.

## WHOM TO SPEAK TO?

Always choose the reporting option that you feel most comfortable with. If you have an issue with a colleague or business partner, you should first discuss it with them directly in a respectful and considerate manner. If that is not an option, speak to your supervisor or line manager. If the issue is highly confidential or inappropriate to discuss, please contact the Human Resources department. If none of the above are possible, report the matter by calling the Ethics Help Center.





## REPORTING VIOLATIONS PROCESS

What's the process to report a concern or violation through the Ethics communication channels?

1. Contact our Ethics Help Center. This is an external service. Note that the details of your report will remain confidential.
2. Your communication will be sent to the investigation panel (formed by HR and Audit and assurance), they will start an investigation. The representative from the investigation panel may request additional details about your concern. Subject to local law, you may choose to stay anonymous and/or decline to provide answers to any questions.
3. You will receive a report ID number that you can use to check its status or provide additional relevant information.
4. GMG investigation panel will issue a report with the case. If the reported issue is within the DOT, HR will proceed.
5. If the reported issue includes gross misconduct (defined above) the Ethics Committee will review the investigation report and act as per the GMG ethics protocol.
6. GMG will take appropriate action. Often, we are unable to share details about the resolution with you to respect and preserve the confidentiality of everyone involved.
  - a. The Ethics Committee received periodically the summary of all investigation's reports, within or not the DOT, done by the panel.



## CASE STUDY

**EXAMPLE SCENARIO:** You violated the company's policy by accident. Will GMG take any corrective action against you?

**WHAT YOU SHOULD DO:** It is best to have an open and honest discussion with your line manager, or the Human Resources Department about your violation.

While we advise that all employees act responsibly and always hold themselves accountable by reviewing their behaviour considering this Code of Conduct, if your actions are inconsistent with the recommended behaviours described in the Code, you may not be protected from disciplinary action or legal consequences as determined by the Ethics Committee. Annual training on the Code of Conduct is also mandatory for all employees.



## GMG HELP CENTER CONTACT DETAILS

GMG is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your line manager or HRBP in instances where you believe violations of policies or standards have occurred.

In situations where you prefer to place an anonymous report in confidence, the information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis. You have our commitment that your grievances will be heard. This is a safe space, and you can report incidents anonymously (unless specified otherwise), 24 hours a day, 7 days a week in your preferred language.

GMG does not tolerate retaliation for asking a question, speaking up or making a report with good intentions or good faith. We encourage you to speak up, be the change and make GMG a better place to work at - take a stand for ethics and integrity in our workplace.

## ETHICSPPOINT WEBSITE

You can submit your report through our secure EthicsPoint web portal via clicking on this link [ethicspoint.gmg.com](https://ethicspoint.gmg.com).

## PHONE REPORTING

Alternatively, you can contact our dedicated ethics reporting hotline. Please use the country appropriate number below:

COUNTRY	PHONE NUMBER
Bahrain	6500 9404
Egypt	015 01718032
Kuwait	2206 3841
Saudi Arabia	800 8501638
United Arab Emirates	800 0120202
Hong Kong	800 930169
Malaysia	1800-81-0782
Singapore	800 4922730



# GMIG