

CODE OF CONDUCT TRAINING

FIVE ▶

ARE YOU AWARE?

1. Are you aware we have a Code of Conduct in place?
2. Are you aware on how can you access this Code of Conduct?
3. Are you aware what should you do if you face any non-compliance to the Code of Conduct?
4. Are you aware on what constitutes an Ethical decision?



OBJECTIVES



This training is intended to –



- a. Raise awareness on why the Code of Conduct is important
- b. Provide guidance on the Code of Conduct and Business Ethics
- c. Build a better Corporate Governance framework
- d. Build transparency and trust within our employees
- e. Provide opportunities to employees to raise any incidents and grievances



WHAT IS CODE OF CONDUCT?

- Code of Conduct is the standard of behavior that is expected out of each FIVE colleague while performing their duties, wherever they are in the world 
- Provides guidance on areas where a colleague needs to make personal and ethical decisions
- Provides guidance on where to go if you need further help or would like to raise a concern using FIVE's reporting channels 

Our Code of Conduct follows the United Nations Global Compact which covers the ten principles on human rights, labour, environment, and anti-corruption

CONTENT of CODE OF CONDUCT

CODE OF CONDUCT	
<input type="checkbox"/> Keys to Ethical Decision Making	<input type="checkbox"/> Anti-money laundering
<input type="checkbox"/> Promotion of diversity, equality and inclusion	<input type="checkbox"/> Prohibition of insider dealing
<input type="checkbox"/> Anti-harassment and anti-discrimination	<input type="checkbox"/> Data privacy and confidentiality
<input type="checkbox"/> Human Rights including freedom of association and collective bargaining	<input type="checkbox"/> Political activities
<input type="checkbox"/> Anti-trust, Fair Competition and Fair treatment of suppliers	<input type="checkbox"/> Environmental Management
<input type="checkbox"/> Third party anti-corruption diligence	<input type="checkbox"/> Community Welfare
<input type="checkbox"/> Anti-bribery and Anti-corruption	<input type="checkbox"/> Guest Safety
<input type="checkbox"/> Gifts and Courtesies	<input type="checkbox"/> Investor, social media relations and Communications
<input type="checkbox"/> Prohibition of substance and alcohol abuse	<input type="checkbox"/> Grievance and whistle-blower policy
<input type="checkbox"/> Conflict of interests	<input type="checkbox"/> Reporting Channels



CODE OF CONDUCT STANDARDS

KEYS TO ETHICAL DECISION MAKING

If you face an issue or a concern on what should be done in a particular situation, consider the following questions –



1. Does the activity appear to be legal in nature?
2. Would you feel comfortable if your conduct was published in a newspaper or on digital media?
3. Does it adhere to the policies, standards and/ or notices of the company?

If the answers to the above questions is “YES”, then your conduct would align with FIVE’s principles and standards.

If you are faced with a doubt, seek assistance!



DIVERSITY, EQUALITY AND INCLUSION

As a FIVE employee, YOU SHOULD

- Treat colleagues with dignity, respect diversity of different cultures and nationalities
- Enrich our culture through the diverse skills, experiences, and backgrounds
- Make all talent decisions ethically and honestly and provide equal employment



- Do not discriminate anyone based on any attributes including race, color, sex, religion, political opinion, national extraction, social origin, age, disability, HIV/AIDS status, trade union membership, and sexual orientation or any other characteristic protected by applicable laws.

DIVERSITY, EQUITY AND INCLUSION – SCENARIO 1

1} Jam, a citizen of a specific country works with the Housekeeping staff. Another team member often teases on their way of communication based on the nationality. What should Jam do?

- A. Go and yell at the team member
- B. Tell your Manager or Superior
- C. Report the same through the reporting channel



ANSWER: Both B and C are right. Please feel free to have a conversation with your immediate superior or manager for support on this issue.

DIVERSITY, EQUALITY AND INCLUSION – SCENARIO 2

2} Joe, a manager with Security team always requests for hiring of male team members only. The HR Executive tries to tell him that they may hire female employees as well; however, Joe believes that females cannot do security tasks. What should the HR Executive do?

- A. Accept Joe's request to hire only male employees
- B. Inform the Group Director of HR
- C. Report the same through the reporting channel



ANSWER: Options B and C are right. Train your teams and employees to do away with gender bias, not undertake any form of discrimination, and hire solely based on merit

ANTI-DISCRIMINATION AND ANTI-HARASSMENT

FIVE has zero-tolerance for any form of abuse or harassment which includes actions that can reasonably be considered as offensive, intimidating, or discriminatory

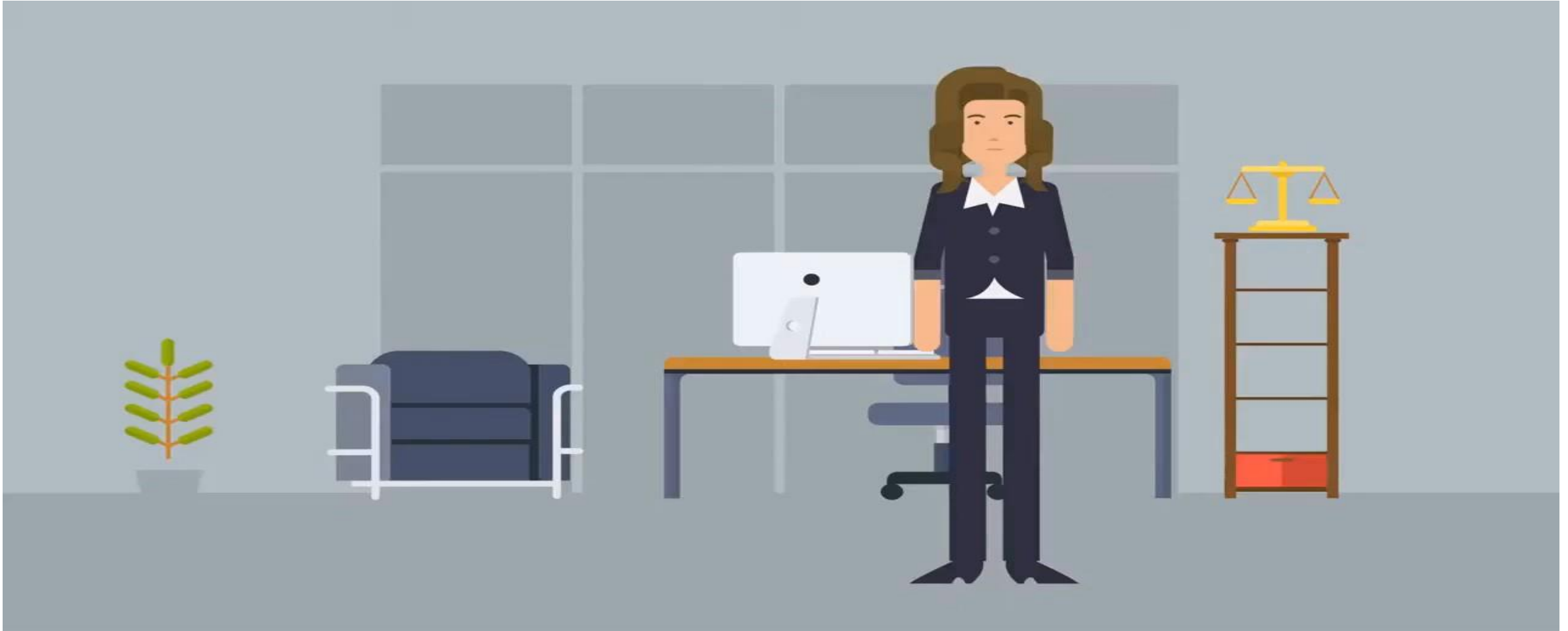
As a FIVE employee, YOU should –

- Not pass any derogatory or offensive remarks against your peers, guests or suppliers
- Provide a safe work environment that is free from any form of discrimination or harassment
- Ensuring that they treat each other with courtesy, professionalism, dignity, and respect



ANTI-DISCRIMINATION AND ANTI-HARASSMENT

Watch the below video to learn more:



ANTI-DISCRIMINATION AND ANTI-HARASSMENT - SCENARIO 1

Peter works for a recruitment company and his colleague Joe sits at a desk which is right behind him. As he walks into work every morning Peter flicks Joe behind the ear as he walks past and says good morning. This irritates Joe who informs her superior about the behavior of her co-worker. Peter says these are just jokes and refuses to stop despite Joe feeling extremely uncomfortable about the behavior and feels harassed by him. What should Joe do?

- A. Stay silent and accept the behavior
- B. Raise a concern through the reporting channels

ANSWER: The correct option is B. Such behavior is unacceptable and should be reported through the Ethics and Compliance Helpline contact number or email ID

HUMAN RIGHTS

- As an employee of FIVE, YOU should:
 - Respect the rights of OTHER individuals
 - DO NOT violate human rights
 - IMMEDIATELY INFORM any acts of child sex tourism, forced adult sex tourism or ILLICIT trafficking
 - PROHIBIT any employment form of forced labour, child labour or modern slavery
 - PROVIDE safe and healthy working conditions



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- FIVE endeavours to uphold the freedom of association and the effective recognition of the right to collective bargaining
- Although unionization is not allowed as per the UAE local laws, FIVE as an organization enables its employees to work together to identify problems and concerns which may benefit the employees at large

ANTI-TRUST AND FAIR COMPETITION

- FIVE believes in vigorous yet fair competition and adheres to applicable competition laws. We believe and encourage fair, ethical, and transparent interactions with our competitors, suppliers, and guests.

As a FIVE employee, YOU should never:

- Discriminate pricing for suppliers based on unfair grounds
- Engage in unfair or exclusionary conduct
- Use any improper means such as misrepresentation, deception, theft, spying or bribery to develop or obtain competitive information



THIRD - PARTY DUE DILIGENCE

- As a FIVE Employee, perform a third-party due diligence for all suppliers:
 - Perform background verification
 - Check if the supplier has been blacklisted in the past by FIVE
 - Perform formal risk assessment and obtain due approvals
 - Obtain proper information (KYC)
 - Perform periodic compliance health checks for suppliers to identify any signs of non-compliance to anti-bribery and anti-corruption norms



ANTI-BRIBERY AND ANTI-CORRUPTION

- All employees of FIVE should –
 - NEVER give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain
 - NEVER offer, give, or receive any gift or payment
 - REJECT any demand for, or offer of, a bribe immediately and report to management



ANTI-BRIBERY AND ANTI-CORRUPTION – SCENARIO

Ray is a housekeeping staff who came for room service at a guest room. May, who was the occupant of the room was caught smoking in the non-smoking room and offered Ray a watch worth 1,000 AED as bribe for not reporting it to Security.

What should Ray do in this scenario?

- A. Accept the watch and allow the guest to do this
- B. Politely refuse the guest on acceptance of the bribe
- C. Inform your reporting manager or superior about the incident



ANSWER: Options B and C. Refuse the guest on the bribes and inform your reporting manager about the incident

GIFTS AND COURTESIES

- Gifts must be legal, reasonable, and approved by corporate management
- Employees must NEVER solicit for tips
- Employees of FIVE must declare and inform any gift received to their reporting manager or HR
- Employees must consult in case of doubt



GIFTS AND COURTESIES – SCENARIO

Supplier offers Hazel, a Finance team member, a fancy gift hamper worth AED 2000 for having quickly processing their invoice for payment. Hazel tells the supplier that she cannot accept the gift. However, the supplier persists and forces her to accept the gift hamper. What should Hazel do?

- A. Accept the gift hamper as a gesture from the supplier
- B. Inform her senior on this offer received and accept the gift
- C. Report this incident as per the designated reporting channels and do not accept the gift

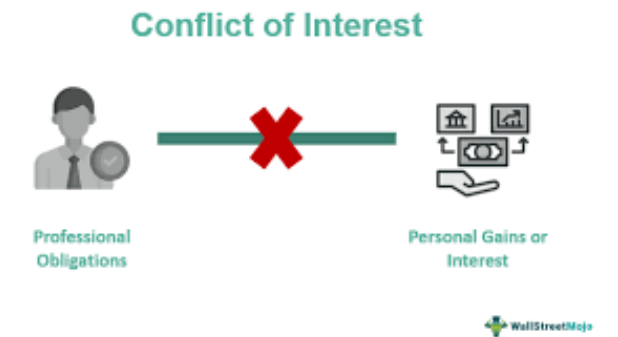
ANSWER: Options B and C. The gift is in excess of the defined internal policy by FIVE. Any gifts which may be deemed to impact the independence of employees should be strictly prohibited

PROHIBITION OF SUBSTANCE AND ALCOHOL ABUSE

- FIVE prohibits working under the influence of drugs or alcohol as it may pose an unacceptable safety risk to oneself and others and could impair job performance
- All FIVE Employees must avoid indulging in any illegal activities which may include, possessing, selling, using and/or transferring any of the illegal drug or substances

CONFLICTS OF INTEREST

- A conflict of interest at work happens when your personal interests interfere with your professional interests. (dealing with close family members, related parties)



- All FIVE employees must not:
 - *misuse their positions*
 - *be part of any decision-making where they have a conflict of interest*
 - *evade declaration of conflict of interest*
- Any potential conflict of interest must be reported

CONFLICTS OF INTEREST – SCENARIO

Kay is a purchasing team member at the hotel and Zoe is her brother who is a food amenity supplier. Kay onboarded Zoe as a supplier without any formal declaration and approved his onboarding as a supplier. Did Kay do the right thing?

- A. Yes. Zoe is a supplier which meets the requirements of the supply hence there is no option
- B. No. Kay should not onboard Zoe because they are related (family members)
- C. No. Kay may hire Zoe with prior declaration and should obtain the approval of the Purchasing Head and the Ethics and Compliance Committee

ANSWER: The right answer is C. Kay should provide a declaration on the conflict of interest and not be involved in the decision of hiring the supplier. Obtain requisite approvals before onboarding the supplier

ANTI-MONEY LAUNDERING

Money laundering is a process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate

- Employees should understand where breaches of Anti-Money Laundering laws might arise
- Any concerns may be raised through the Reporting Channels.

DATA PRIVACY AND CONFIDENTIALITY

FIVE is committed to :

- Collect and use data in line with our values, applicable laws and with respect for privacy
- Ensure necessary precautions to protect the Company information as follows:
 - **NEVER SHARE PASSWORDS AND ACCESS CARDS WITH OTHER EMPLOYEES**
 - Keep data in protected & secured places
 - Report potential threats to IT Department
 - Respect the brand guidelines (logo/image/hotel name)
 - Do not share confidential financial information with any personnel outside the organization



DATA PRIVACY AND CONFIDENTIALITY – SCENARIO

Ben, an employee of the Finance team is handling confidential data regarding financial statements of the organization. He is required to share this information to a@xyz.com but erroneously shares it on a@mno.com. What should Ben do in this situation?

- A. Delete the email and not do anything else
- B. Inform a@mno.com to delete the email and forward information on the correct email ID
- C. Report a misdirected email incident on the helpline number and send the information to the correct email ID

ANSWER: C is the correct answer. All misdirected emails and non-compliances to the data privacy policy should be reported as per the reporting channel to take guidance for action to be taken

MAINTAIN BUSINESS RECORDS AND FINANCIAL ACCURACY

- All FIVE employees should
 - Ensure that all required financial information to be accurate, valid, reliable, timely, relevant, and complete
 - Adhere to the internal controls formulated as per policies and procedures
 - Preserve records as per the company's data retention policy



POLITICAL ACTIVITIES

- As a FIVE employee -
 - Any political contribution and/or affiliation, monetary or non-monetary, shall strictly be done in the personal capacity, without involving any conflict with the interest of the Company.
 - When communicating views towards any political party, the expressed views or opinions should clearly be stated as personal and not those of the Company.

ENVIRONMENTAL MANAGEMENT

- As a FIVE employee you must –
 - Protect the environment
 - Do not litter; dispose waste as per the segregated wastebins near you
 - Switch off lights, fans and any other equipment when not in use
 - Do not waste water and report any form of water leaks
 - Reach out to the Sustainability Director to provide any ideas for reduce, recycling and reuse
 - Utilize and promote the usage of sustainable materials in your business processes



GUEST SAFETY

All FIVE employees should respect and protect guest privacy:

- Guests, including celebrities. Do not discuss about the hotel guests with anyone
- Avoid asking guests/celebrities for pictures or autographs
- Do not talk to the media
- Do not ask guests for personal information, always maintain professionalism
- Promote accessibility of infrastructure and services for all employees and disabled guests as per the detailed policy on infrastructure and services

INVESTOR, SOCIAL MEDIA RELATIONS AND COMMUNICATIONS

All FIVE employees should ensure that :

- All our external communications is only through our authorized and designated representatives
- Any facts relating to our Company are not manipulated or misrepresented
- Be cautious when writing social media posts which are personal opinions
- DO NOT disclose any confidential information about FIVE
- Post anything that might constitute a threat, intimidation, harassment, or bullying





REPORTING CHANNELS

GRIEVANCE PROCEDURES

- FIVE aims to create workplaces in which open and honest communications among all colleagues are valued and respected.
- FIVE recognizes the right of colleagues to express their Grievances and to seek a solution concerning disagreements.
- Report the Complaint(s)/Concern(s) to their immediate Supervisor or Line Manager or as per the reporting channels available

WHISTLEBLOWER POLICY

- An illustrative list of concerns which could be raised:
 - Any unlawful act whether criminal/civil affecting operations of the Company
 - Negligence causing substantial and specific danger to public health and safety
 - Deliberate violation of or failure to comply with applicable local law, regulation, or legal obligation
 - Material breach of Company's policies, procedure(s), Code of Conduct, or applicable regulatory requirements
 - Fraud; for example, fabricating compliances, or Company's financial statements
 - Theft; including theft of FIVE's equipment's or cash or other belongings of FIVE's employees
 - Offensive behaviour, harassment, bullying, oppressive discrimination, abuse of authority etc.



REPORTING CHANNELS

- Notify your Superiors
- Connect with:
 - the Senior Management
 - a Human resources representative
 - the Chief Risk and Compliance Officer or
 - a member of the Ethics and Compliance Committee.
- You may report concerns 24 hours a day, seven days a week
- Grievance helpline available to the team members





QUESTIONS ?

FIVE ▶

THANK YOU