



## **Code of Conduct and Engagement with Suppliers / Business partners.**

**GAMI AIR CONDITIONERS AND MAUNUFACUTIRING COMPANY LLC** (hereinafter “GAMI”) have adopted the following Code of Conduct with respect to all of its commercial transactions, whether local or international with a view to nurture and protect GAMI’s reputation for integrity and highest standards of ethical behaviour. This has been further extended to include basic criteria for engagement of vendors.

**LOCAL AND FOREIGN LAWS:** No officer, employee or representative of **GAMI** may, directly or indirectly, break or seek to evade the laws or regulations of the United States or the United Arab Emirates or the laws or regulations of any country in, through or with which it seeks to do business. That an illegal act is a “customary business practice” in any country is not sufficient justification for violation of this provision.

**BRIBERY and FACILITATING PAYMENTS:** No officer, employee or representative of **GAMI** may, directly or indirectly, offer or provide a bribe and all demands for bribes must be expressly rejected.

Suppliers wishing to engage with GAMI for business purposes must refrain from offering any kind of bribe to any GAMI employee with an intent to influence the decision of awarding any contract or purchase order for supplies

Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.

**GAMI** and its officers, employees and representatives shall not offer or make facilitating payments to government officials in order to encourage them to expedite a routine governmental task that they are otherwise required to undertake. **GAMI** shall have discretion to deviate from this prohibition if the government action sought is an urgent matter concerning health or safety. **GAMI** recognizes that extortion is widespread and that participation by the business community increases demand for facilitating payments.

**KICK-BACKS:** No officer, employee or representative of **GAMI** may “kick-back” any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates.

No requests for Kick-backs of any kind shall be entertained by any Suppliers who wish to engage with GAMI for business purposes. Evidence of such requests must be reported to GAMI without any fear of repercussions to the ongoing discussions or established business relation with GAMI.

A “kickback” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kickback) of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

**CONFLICTS OF INTEREST:** Officers, employees and representatives of **GAMI** shall avoid any relationship or activity that might impair, or appear to impair, his or her ability to render objective and appropriate business decisions in the performance of his or her job.

**POLITICAL CONTRIBUTIONS:** Neither **GAMI** nor any of its officers, employees or representatives may make a political contribution in order to obtain an unlawful business advantage. **GAMI** shall comply with all public disclosure requirements.

**PHILANTHROPIC CONTRIBUTIONS:** **GAMI** and its officers, employees and representatives may make contributions only for *bona fide* charitable purposes and only where permitted by the laws of the country in



which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.

**EXTORTION:** GAMI and its officers, employees and representatives shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

**GIFTS, HOSPITALITY AND ENTERTAINMENT:** GAMI and its officers, employees and representatives shall avoid the offer or receipt of gifts, meals, entertainment, hospitality or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and *bona fide* expenditures, or are in violation of the laws of the country of the recipient.

**REPORTING REQUIREMENT:** Officers, employees and representatives of GAMI who find themselves subjected to any form of extortion or who are asked to participate in any way in a bribery scheme shall promptly report these occurrences to senior corporate management, without fear that their employment will be adversely effected.

**COMPANY RESPONSE:** No employee will suffer demotion, penalty, or other adverse consequences for not paying bribes even when GAMI may lose business as a result of the employee's refusal to do so. Employees are encouraged to report alleged violations of this Code of Conduct to senior management and no employee will suffer demotion, penalty or adverse consequences for reporting.

GAMI will, where appropriate, sanction employees, suppliers or business partners for violations of this Code of Conduct.

**COMPANY ACCOUNTS:** GAMI shall maintain complete and accurate financial records, ensuring that all transactions are properly and fairly recorded in appropriate books of account available for inspection.

**COMMUNICATIONS AND TRAINING:** GAMI will make annual training available for all principals, key employees involved in sales, marketing and procurement.

**Corporate Social Responsibility of Business partners:** It is the responsibility of each and every Business partner / Supplier who wishes to engage with GAMI to ensure that they comply with all aspects of being a Socially responsible corporate / business house. These would primarily include refraining from engaging child labour and exploitation of labour engaged in the work process.

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