

1. CODE OF ETHICS AND COMPLIANCE
2. HEALTH & SAFETY POLICY
3. ANTI BRIBERY POLICY

**Office Connect Goods Wholesalers LLC  
and Affiliated Companies**

- a. Office Connect Goods Wholesalers LLC
- b. SPS Technical and Cleaning Services LLC
- c. Office Connect Information Technology LLC
- d. Office Connect Printing and Gift Items LLC
- e. Network Binary Computer Training LLC

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PO BOX 113976 Dubai UAE

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Dear Partner,



Office Connect Goods Wholesalers LLC and group of companies have experienced exceptional growth since it was formed in 2015. We are constantly expanding our network of operations, and our reputation, product, and service are second to none. The relationships we have with our suppliers, contractors and business partners have made a big contribution to this growth and they are crucial to our future success as an Office Supplier.



**Ethics & Compliance** These relationships must however, be built on a foundation of integrity and ethics. This guide sets out Office Connect Group values and commitment to doing business ethically, responsibly and within the law. We expect you to share these values and uphold them when doing business with Office Connect or acting on our behalf.

If you think that you have observed any unethical practices taking place while doing business with us, we encourage you to report them to us immediately. In return, we will take your concerns seriously and investigate them fully.

**Health & Safety Policy**

Office Connect Group expects suppliers and its business partners to understand and fully comply with all applicable international, national, state and local laws and regulations, including, but not limited to, all environmental, health and safety and related laws and regulations.

**Anti Bribery Policy**

Office Connect Group forbids the payment cash or gifts to influence the judgment or conduct of any individual or to ensure a favorable outcome.



## Our values

Office Connect Group values form the basis of doing business with us and are central to its success. This Code of Ethical Purchasing and Supply is based on these values.

### **‘Delivering best practice’**

We encourage our suppliers, contractors and business partners to trust us by acting ethically and fairly when dealing with them.

### **‘Attention to detail’**

We must be careful to think about the effects of our actions or how they might be perceived by others.

### **‘Prime responsibility’**

We must do what is right and act ethically with integrity at all times. This also means not being afraid to take the lead on ethical business issues.





*This Code applies to all supplier partners of Office Connect Goods Wholesalers LLC and its affiliated / subsidiary companies and forms part of our contract with you. We take breaches of the Code seriously and may decide to review our business relationship with you (including termination) as a result.*





### Anti-bribery

Office Connect Group forbids the payment cash or gifts to influence the judgment or conduct of any individual or to ensure a favourable outcome. This includes Office Connect Group own Board members, employees, consultants, agents, subcontractors, as well as employees of other organisations including but not limited to private or public organisations.

Office Connect Group does not permit its employees or suppliers to offer anything of value to public or government officials without prior authorisation from the Office Connect Group Ethics and Compliance Office.

Examples of public or government officials include:

- Direct government employees
- Employees of government owned entities
- Employees of international organisations such as Overseas Exporting Agencies

### Competition law

Office Connect Group is fully committed to free and fair competition within all markets where it operates. As our supplier partner, you are expected to uphold these same values and comply fully with relevant competition laws when acting on our behalf.

Amongst other things this means that you should not share pricing information with our competitors or collude with them to fix prices.

### Conflicts of interest

A conflict of interest occurs when personal relationships or activities hinder you from acting in **Office Connect Group** best interests when supplying goods or services to us. You must avoid actual or perceived conflicts of interest at all times.

As one of our supplier partners, you must disclose actual or likely conflicts of interest and discuss them with the Office Connect's management. Activity that is later approved must be recorded.

#### Gifts and entertainment

Office Connect **Group** understands that gifts are often an important part of doing business in many cultures. Giving and receiving gifts or entertainment must however relate to Office Connect Goods **Group** lawful business.

Generally, modest gifts or entertainment are allowed, provided:

- The reason for the gift or entertainment is appropriate.
- The gift or entertainment helps to improve business relationships.





It is never appropriate to:

- Offer a gift, entertainment, or benefit to influence the decision of an Office Connect Group employee.
- Offer a gift, entertainment, or benefit while involved in a current procurement process (RFI, RFQ, and RFP).
- Offer a cash gift.
- Offer entertainment where the supplier will not be present (e.g. sports event tickets).
- Offer an opportunity to buy goods or services under terms that are not open to all Office Connect Group employees.

Office Connect Group employees shall refuse all improper entertainment or gifts offered to them and will promptly report the event to their manager or the Office Connect's Ethics and Compliance Office.

### Health, safety & environment

Office Connect Group expects suppliers to understand and fully comply with all applicable international, national, state and local laws and regulations, including, but not limited to, all environmental, health and safety and related laws and regulations.

### Keeping business and financial records

The way Office Connect Group keeps business records has a direct impact on the Office Connect's reputation. Records kept by you concerning your business with the Office Connect's must be correct in all important respects. Do not hide, fail to record information, or make false entries. All financial records must conform to accepted accounting principles.





**Labour rights**

You are expected to comply with all relevant employment laws and regulations including statutes that prohibit discrimination, human trafficking, and forced labour in the workplace. Office Connect also expects you to comply with all laws and regulations related with fair treatment, minimum wage and other applicable compliance requirements imposed by the applicable laws and regulations.

**Privacy**

As a supplier partner you should take proper measures to safeguard confidential information and data you may be entrusted with. You must also comply with all relevant data privacy laws and only use personal data for the purpose intended. You must also take care to ensure that Etihad’s intellectual property rights are protected.

**Contacts and reporting**

Office Connect is committed to doing business ethically, responsibly and within the law. As one of its suppliers, your responsibility begins with making sure that you understand and comply with this code. If you have observed any breaches of this Code or are concerned about any ethical or legal compliance issues, you should bring

them forward using Ethics Line by dialing 00971-55 9910 385. Alternatively you can send an email to gm@officeconnectme.com clearly stating that you are a supplier of Office Connect Group.

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