



FOUNDATIONAL POLICIES



TABLE OF CONTENTS

ENVIRONMENT

01 Environmental and Sustainability Policy

02 Vessel Lifecycle Management Policy

SOCIAL

03 Health, Safety and Wellbeing Policy

04 Stop Work Policy

05 No Smoking Policy

06 Drug and Alcohol Policy

07 Corporate Social Responsibility Policy

GOVERNANCE

08 Anti-bribery Policy

09 Anti-modern Slavery and Anti-human Trafficking Policy

10 Data Protection Policy

11 Sustainable Procurement Policy

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ENVIRONMENTAL & SUSTAINABILITY POLICY

It is our mission to deliver reliable service by focussing on safety, quality and our customers and other stakeholders; to provide an enriching environment and to always live by our values.


The Milaha Environmental and Sustainability Policy applies to all locations and operations under the control or influence of Milaha and its entities.

Milaha is committed to improving our environmental and sustainability standards and performance through:

- The protection of the environment from the impacts of our activities,
- The prevention of pollution,
- The continual improvement of our operations to enhance our environmental and sustainability performance,
- Working towards sustainable operations in line with the qatar national vision 2030.
- Compliance with relevant regulatory environmental requirements and endeavour to adopt higher standards where it is in the overall best interest of our stakeholders.

Milaha will achieve our environmental and sustainability commitments through:

- Establishing and progressively implementing environmental management systems across Milaha in accordance with the requirements of ISO 14001,
- Providing suitable information, instruction, training and supervision to enable staff to deliver on their environmental and sustainability responsibilities,
- Developing, maintaining and exercising effective contingency plans,
- Extending our influence over our supply chain and ensuring their commitment to environmental and sustainability performance improvement,
- Considering the life cycle and sustainability of our operations and activities to ensure that environmental impacts are minimised at all stages,
- Developing and implementing environment and sustainability strategies,
- Establishing and monitoring environmental and sustainability performance objectives and targets and implementing programmes for their achievement,
- Identifying and addressing opportunities for improved environmental and sustainability performance,
- Responding proactively to rectify identified non-conformities and implementing measures to prevent their recurrence,
- Reviewing and auditing the company's processes and performance.

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VESSEL LIFECYCLE MANAGEMENT POLICY

Milaha is committed to conducting business in a sustainable manner, suitably managing risks related to human health, safety and the environment, and preventing violation of any human rights. This commitment extends to the lifecycle management of vessels, from design, construction, and operation, to transfer or end of life recycling.

To achieve this, Milaha shall:

- Ensure every ship that it commissions for construction is designed and constructed in a manner which eliminates or minimises the use of hazardous materials,
- Ensure every ship commissioned, purchased, or operated by Milaha has a specific inventory of hazardous materials (IHM) that is kept up to date,
- Operate all vessels in its fleet in a manner that avoids or reduces the presence of hazardous substances on board,
- Where possible, remove any hazardous substances present on our vessels in a controlled manner to minimise adverse effects on human health and the environment, and replace these with non-hazardous substances,
- Update the vessel IHM prior to transfer/sale of the vessel, and require the new owners to commit to the responsible recycling of the vessel at end of life as a condition of transfer/sale,
- Comply with the requirements of the IMO Hong Kong convention 2009 and any other applicable local or international law when arranging, directly or indirectly, for end-of-life recycling of the vessel, including the provision of an up-to-date IHM, and the use of only reputable recycling facilities certified to ISO 9001, ISO 14001 and ISO 45001 standards and compliant with the IMO Hong Kong convention 2009,
- Comply with all relevant Milaha policies and procedures.

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HEALTH, SAFETY AND WELLBEING POLICY

It is our mission to deliver reliable service by focussing on safety, quality and our customers and other stakeholders; to provide an enriching environment and to always live by our values.

The Milaha Health, Safety and Wellbeing Policy applies to all locations and operations under the control or influence of Milaha and its entities.

Milaha is committed to improving our health and safety standards and performance through:

- Preventing all occupational ill-health and injuries,
- Looking after our people, partners, customers, visitors and the communities we operate in,
- Minimising risks through adopting industry leading best practice,
- Integrating safety principles into management systems and all business activities to ensure that our activities are carried out in a safe and ethical manner.

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HEALTH, SAFETY AND WELLBEING POLICY

Milaha will achieve our health, safety and wellbeing commitments through:

- Ensuring adequate resources and support available to fulfil our safety obligations,
- Meeting or exceeding all required regulatory and other applicable obligations,
- Ensuring that all health and safety requirements are implemented by line management, who are fully responsible for ensuring that activities under their control and influence are carried out safely,
- Providing effective training, instruction, and information to ensure that health and safety requirements are understood throughout the business,
- Enabling a leadership culture that champions health and safety and seeks to generate continuous improvement,
- Providing a safe and supportive workplace, with strategies to enable the protection of our employee's mental health and wellbeing,
- Systematically identifying and effectively managing risks and opportunities throughout the organisation,
- Setting health and safety objectives through stakeholder consultation and the regular review of outcomes,
- Measuring and monitoring of performance through regular inspections, audits and the undertaking of detailed and transparent investigations,
- Engaging in open consultation with employees and other stakeholders,
- Enabling our people to make positive lifestyle choices to promote physical and mental wellness.

Employees are empowered and responsible to always:

- Work in accordance with safe systems of work, protecting the health, safety and wellbeing of all within the workplace,
- Report uncontrolled hazards that they encounter and any incidents which occur,
- Actively participate in health and safety consultation and training processes.

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STOP WORK POLICY

The Milaha Stop Work Policy applies to all locations and operations under the control or influence of Milaha and its entities.

Milaha is committed to providing a healthy and safe workplace for all our employees, clients, contractors, and visitors, often in challenging operational environments.

Milaha recognises the right and responsibility of all persons to STOP WORK at any point where they have a reasonable expectation that an event which may result in injury, environmental impact or damage to property could occur. This includes not only Milaha employees but also contractors and visitors at our operational locations.

Where an activity is stopped it is the responsibility of all involved, particularly line management and vessel masters, to ensure the activity is ceased and managed in a manner which does not create further hazards.

Upon being made safe, the act and / or conditions must be reported, reviewed and where necessary investigated according to appropriate procedural requirements.

Milaha shall ensure that no punitive measure will be taken either directly or indirectly against any employee, contractor or visitor who has exercised in good faith the right to stop work.

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NO SMOKING POLICY

The Milaha No Smoking Policy applies to all locations and operations under the control or influence of Milaha and its entities.

Milaha is committed to providing a healthy and safe workplace for all our employees, clients, contractors, and visitors.

This policy applies equally to consumption of tobacco products including cigarettes and cigars, and other smoke inducing products such as e-cigarettes. The consumption of shisha is banned from all locations.

It is forbidden for any Milaha employee, contractor or visitor to smoke within any place of work including, but not limited to, offices, halls, stairways, mess rooms, washrooms, lobbies, workshops, warehouses, showrooms, vehicles, plant, bridges, engine rooms or accommodation.

All Milaha sites, locations, and vessels shall provide safe smoking areas. These locations must be clearly designated and shall be assessed to ensure they do not compromise the safety of either the location or other people.

Any employee found smoking outside a designated safe smoking area shall be liable for referral to Human Resources for any appropriate action by Milaha which may include immediate termination.

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DRUG AND ALCOHOL POLICY

The Milaha Drug and Alcohol Policy applies to all locations and operations under the control or influence of Milaha and its entities.

Milaha is committed to providing a healthy and safe workplace for all our employees, clients, contractors, and visitors.

Milaha operates a zero-tolerance policy to the use of drugs or consumption of alcohol. All individuals working for Milaha, including contractors, are expected to report fit for duty for scheduled work and be able to perform assigned duties safely and acceptably without any limitations due to the use or after-effects of alcohol, illicit drugs, non-prescription drugs, or undeclared prescribed medications.

Milaha strictly prohibits the use, making, sale, purchase, transfer, distribution, consumption, or possession of drugs or alcohol on company property. Milaha reserves the right to conduct searches for drugs or alcohol, including, but not limited to, searches of offices, vehicles, accommodation, lockers, filing cabinets, desks, packages, etc. which are on Company property or in a Company facility. Any drugs or alcohol found as a result of such a search will be confiscated and the occupant or user of the object found will be subject to disciplinary action, which may include immediate termination.

Milaha reserves the right to undertake "for cause" and random testing on individuals in accordance with approved procedural requirements.

Employees who are prescribed medication are required to produce a medical report detailing any potential negative effect on job performance the medication may have.

Employees are required to provide the report with any restrictions in performance of their duties to the Milaha HSSEQ Department to enable determination of potential risk, limitation or restriction. This may result in modification of employee duties or temporary reassignment.

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CORPORATE SOCIAL RESPONSIBILITY POLICY

Milaha is committed to supporting the welfare of the communities in which it operates. Corporate Social Responsibility (CSR) is an integral part of Milaha's corporate strategy and aims to provide support on environmental initiatives, health & safety, and labour welfare, in addition to providing equal employment opportunities thorough:

1. Striving for economic development that positively impacts the society at large and specifically the communities in which Milaha operates.
2. Embracing responsibility for Milaha's actions and create a positive impact in the selected focus areas through its CSR activities.
3. Engaging in meaningful activities to increase awareness of the issues and recognition for Milaha.

CSR commitments include:

- **Environment**

Striving to reduce negative environmental impact through a commitment to reduce energy and non-renewable resource consumption. Milaha encourages environmental protection, sustainable resource use, prevention of pollution, recycling, and other "go green" initiatives in the workplace and the community it serves.

- **Health, Safety & Security**

Protection of the health and safety of all individuals in the workplace and communities in which it operates, by providing a safe, secure, and healthy working environment in compliance with all relevant regulatory and other obligations.

- **Employee Welfare**

Our employees are our most valuable asset. We comply with relevant labour laws and regulations and establish internal rules and measures to protect the legal rights and interests of all our employees. Milaha is committed to creating a positive working environment that promotes employee well-being, job satisfaction and work life balance.

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CORPORATE SOCIAL RESPONSIBILITY POLICY

- **Equal employment opportunities**

Milaha aims to protect the employment rights of qualified applicants and employees regardless of race, colour, sex, age, religion, national origin, disability and/or other protected categories under applicable laws. We foster diversity and inclusion within the organisation as we offer employee development programs, training, and resources to support employees.

- **Fair Operating Practices**

Milaha is committed to promoting fair practices within its value chains, by encouraging anti-corruption, anti-bribery, fair competition, respecting property rights, and protecting consumer data and privacy..

- **Community**

Milaha is committed to community involvement and development through education and cultural support.

Milaha's Human Resources and Health, Safety, Security, Environment & Quality (HSSEQ) functions shall be responsible for ensuring Milaha's adherence to its CSR commitments. Milaha's Corporate Communications function shall be responsible for managing and coordinating CSR initiatives, sponsorships, and events, including conferences, and speaking engagements. Corporate Communication will involve HSSEQ and HR to contribute significantly to driving this policy as and where required.

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ANTI-BRIBERY POLICY

1. Introduction

Milaha is committed to dealing in a fair and honest manner with all our clients, suppliers, agents, employees, and contractors and any third party that may be involved in our business.

Milaha is committed to the highest standards of honesty, ethics, and integrity, and all Milaha employees and stakeholders are required to abide by such standards.

Milaha prohibits foreign and domestic bribery in addition to any corrupt practices of whatever nature. All Milaha directors, employees and contractors should comply with this policy. In the event of any doubt regarding the appropriateness of a potential/proposed transaction, any question must be addressed to Milaha's Internal Audit Department for review and evaluation before the execution of the transaction.

2. Purpose

Milaha is committed to the principles of integrity, transparency and accountability and be transparent in doing business.

This Policy establishes guiding principles that demonstrate Milaha's commitment to:

1. Ensuring Milaha's compliance with applicable anti-bribery and corruption laws and regulations,
2. Fostering a compliance culture within Milaha,
3. Ensuring that all Milaha's stakeholders understand and commit themselves to this policy,
4. Maintaining and raising the level of awareness of Milaha's regulatory obligations through this Policy for an effective compliance management system, and
5. Taking appropriate corrective action to clear regulatory findings and breaches.

3. Scope

1. This Policy applies to all Milaha's employees, officers, directors, consultants, and stakeholders,
2. This Policy applies to Milaha's business operations and activities wherever they take place in the world, and
3. This Policy will cover all new and existing business activities of Milaha.

ANTI-BRIBERY POLICY

4. Definitions

Accounting Violations – is the intentional manipulation of financial statements to create a facade of a company's financial health.

Bribery – is defined as the offering, giving, or soliciting of any item of value to influence the actions of a Public Official or any other person to gain personal, commercial or contractual advantage.

Compliance – Ensuring that regulatory requirements are met.

Compliance function – An independent function in an organisation that identifies, assesses, advises on, monitors, and reports on the organisation's level of compliance.

Employee – Any person hired by Milaha who receives a salary from the company. This includes direct hires, contractors, trainees, crew, and divers.

Fraud – is the crime of gaining financial benefits in a dishonest way.

FCPA – is the US Foreign Corrupt Practices Act.

Foreign Official – The FCPA defines the Foreign Official as "any officer or employee of a foreign government or any department, agency or instrumentality thereof, or of a public international organization".

Kickbacks – is an illegal payment intended as compensation for favourable treatment or other improper services, when suppliers for example pay part of their fees to the individuals who give them the contract (might not involve Public Officials).

Milaha – Refers to all Milaha's entities in locations world-wide.

Management – Any person having authority and responsibility for planning, directing, and controlling the activities of Milaha, including but not limited to the Board of Directors, the Chief Executive Officer, the Chief Operating Officer, the Chief Financial Officer.

Non-Compliance – A breach by a person or an organisation of regulatory requirements.

Public Official – Any officer or employee of a government including employees of state-owned or state-controlled entities.

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ANTI-BRIBERY POLICY

Subsidiary - A company controlled by another company or in which more than 50% of the capital is owned, directly or indirectly by another company.

Transparency International - is an international non-governmental organization founded in 1993 and based in Berlin, Germany. Its non-profit purpose is to take action to combat global corruption measures and to prevent criminal activities arising from corruption.

5. Responsibility

The Department Head (VP Legal) is responsible for implementing and maintaining this policy document.

5.1 Board of Directors

Milaha Board of Directors is responsible for:

- a. Promoting the compliance culture within Milaha, and
- b. Ensuring that Milaha's business activities are conducted with high ethical standards.

5.2 General Management

Milaha Management is responsible for:

- a. Ensuring that this Policy is appropriately implemented,
- b. Promoting the compliance culture and enforcing high ethical standards,
- c. Ensuring that all issues related to anti-bribery and corruption are effectively managed, and
- d. Ensuring that all non-compliance issues are reported in a timely manner.

5.3 Legal Affairs Department (Compliance function)

Milaha compliance function is committed to:

- a. Foster the compliance culture within Milaha,
- b. Advise Milaha's management and employees on applicable laws and regulations from a compliance perspective related to anti-bribery and corruption,
- c. Update this policy when needed, and
- d. Ensure compliance with applicable requirements related to anti-bribery and corruption.

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ANTI-BRIBERY POLICY

5.4 Audit function

Internal and External Audit are responsible for checking for compliance with this Policy.

5.5 All Employees

All Milaha's employees are responsible for complying with this Policy, and should be committed to:

- a. Ensure that their own activities comply with all applicable laws and regulations related to anti-bribery and corruption,
- b. Perform their job duties and responsibilities in a manner that reflects the highest ethical and professional standards of conduct,
- c. Report any regulatory breach and violation related to bribery and corruption, and
- d. Apply the practices communicated to them by the management.

6. Policy content

Milaha is committed to apply the highest standards of ethical conduct and integrity in its business activities in the State of Qatar and overseas. Every director, employee, contractor acting on Milaha's behalf is responsible for maintaining Milaha's reputation and shall conduct the company's business honestly and professionally. Milaha takes a zero-tolerance approach to bribery and corruption.

6.1 Regulatory framework

The State of Qatar does not have specific legislation or regulation on anti-bribery and corruption. However, anti-bribery and corruption provisions are included in the below legislations:

1. Law No. (11) of 2004 issuing the Penal Code,
 2. Law No. (8) of 2009 on Human Resources Management,
 3. Law No. (24) of 2015 regulating Tenders and Auctions,
 4. Law No. (14) of 2004, as amended, on the promulgation of the Labour Law, and
 5. Law No. (4) of 1995, as amended, concerning the State Audit Bureau.
- In addition to the above-mentioned laws, the State of Qatar has signed and ratified the United Nations Convention against Corruption which is considered as a major international instrument on fighting corruption.

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ANTI-BRIBERY POLICY

6.2 Standards of Conduct

To comply with this policy, Milaha stakeholders shall perform their duties and work in accordance with the following concepts:

- a. Perform work honestly, with transparency, integrity and with accountability,
- b. Avoid any Fraud, Bribery, Kickbacks. Accounting violations,
- c. Avoid any illegal activity,
- d. Avoid any conflict of interest,
- e. Inform Compliance and Management about any non-compliance issue,
- f. Prevent and report instances of bribery and corruption, and
- g. Raise any question you may have about this policy,

6.3 Commitment to fair way of conducting business

Milaha is committed to:

- a. Conduct its business fairly, honestly and transparently.
- b. Not to offer or accept bribes whether directly or through a third party.

6.4 Avoiding bribery

Milaha is committed to non-tolerance towards any Kickbacks in any ways. In addition to being illegal implying possible prosecution under appropriate law, this damages the reputation of business and its associates. Accordingly, all Milaha's stakeholders acting on behalf of Milaha, shall strictly refrain from:

- a. Offering a financial advantage with the expectation that a business advantage will be received or to reward a business advantage already received,
- b. Offering a financial to a Public Official with the expectation that a business advantage will be received or to reward a business advantage already received,
- c. Accepting a financial advantage from a third party who is expecting to receive a financial advantage from Milaha, and
- d. Engaging in any activity that encourages the commitment of any bribery.

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ANTI-BRIBERY POLICY

6.5 Encourage Raising a concern

Milaha is also committed to ensuring that its stakeholders have a safe and reliable way of reporting any suspicious activity. Such activity shall be reported with no delay to Milaha's Internal Audit Department and Milaha will support anyone who raises a genuine concern under this Policy.

7. Consequences of Non-compliance

Milaha is committed to strict enforcement and compliance with this Policy by all stakeholders acting on behalf of Milaha.

In addition to penalties such as large fines and trade sanctions, other adverse consequences of non-compliance with applicable anti-bribery laws may include reputational loss and loss of shareholder's confidence. In addition, Milaha staff should note that the penalties for violating the relevant Qatari legislations against bribery and corruption include fines and imprisonment for individuals not exceeding ten years.

Any violation of this Policy by a stakeholder acting on behalf of Milaha may result in disciplinary actions leading to the employment termination or business relationship.

8. General Guidelines

In the event of any doubt regarding the propriety of a proposed transaction, the question should be referred to Milaha's Legal Affairs Department for review and advice before any action.

9. Review Frequency

The suitability and effectiveness of this document, as part of the Milaha Management System, will be evaluated on an annual basis and included within the management review or as specific situations warrant, or prior to significant operational change, or as a result from findings of Internal Audit

10. Record Keeping

All records relating to the document and record control described in this document shall be maintained for a period not less than 5 years or specific requirement if greater by legislation or QFMA requirement.

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ANTI-MODERN SLAVERY AND ANTI-HUMAN TRAFFICKING POLICY

1. Introduction

Modern slavery is a fundamental violation of basic human rights, a severe exploitation of other people for personal or commercial gain and a crime. Modern slavery takes various forms including slavery, servitude, forced labour and human trafficking.

1. Slavery is where ownership is exercised over a person,
2. Servitude involves the obligation to provide services imposed by coercion,
3. Forced labour involves work exacted from any person under the menace of a penalty and for which the person has not offered himself/herself voluntarily,
4. Human trafficking involves arranging or facilitating the travel of another with a view of exploiting him/her.

The most common forms of modern slavery are labour exploitation including child labour and domestic servitude.

2. Purpose

This Policy sets out the main framework covering Milaha's compliance management system.

This Policy sets out Milaha's compliance and disclosure commitments under all regulatory frameworks in which it operates in Qatar relating to anti-modern slavery and anti-human trafficking, as applicable to Milaha.

3. Scope

This policy applies to Qatar Navigation Q.P.S.C. and all its subsidiaries' ("Milaha") employees at all levels, directors, officers, agency workers, agents, contractors, and business partners wherever located.

4. Definitions

Milaha - Refers to all of Milaha's entities in locations world-wide.

ILO - The International Labour Organization is a United Nations agency whose mandate is to advance social and economic justice through setting international labour standards. Founded in October 1919 under the League of Nations, it is the first and oldest specialised agency of the UN.

Management - Any person having authority and responsibility for planning, directing and controlling the activities of Milaha, including but not limited to the Board of Directors, the Chief Executive Officer, the Chief Operating Officer, the Chief Financial Officer and all VPs, EVPs.

ANTI-MODERN SLAVERY AND ANTI-HUMAN TRAFFICKING POLICY

Employee - Any person hired by Milaha who receives a salary from the company. This includes direct hires, contractors, trainees, crew and divers.

Compliance - Ensuring that regulatory requirements are met.

Non-Compliance - A breach by a person or an organisation of regulatory requirements.

Compliance Function - An independent function in an organisation that identifies, assesses, advises on, monitors and reports on the organisation's level of compliance.

Subsidiary - A company controlled by another company or in which more than 50% of the capital is owned, directly or indirectly by another company.

United Nations (UN) - An international organization of countries set up in 1945, in succession to the League of Nations, to promote international peace, security, and cooperation.

5. Responsibility

All Milaha stakeholders are responsible for ensuring compliance with this policy, including but limited to Board of Directors, Management and employees at all levels, contractors, suppliers, and other business partners.

6. Policy Content

6.1 Compliance to International and National Laws

This Policy sets out the main framework covering Milaha's compliance management system covering, at a minimum, the following:

1. Major International Instruments

- a. The United Nations Slavery Convention of 1926,
- b. The United Nations Protocol to the Slavery Convention of 1953,
- c. The United Nations Supplementary Convention on the Abolition of Slavery of 1956,
- d. The United Nations International Covenant on Civil and Political Rights (ICCPR) of 1966,
- e. The International Labour Organization (ILO) Convention concerning Forced or Compulsory Labour of 1930,
- f. The ILO Convention concerning the Abolition of Forced Labour of 1957,
- g. The ILO Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour of 1999,

ANTI-MODERN SLAVERY AND ANTI-HUMAN TRAFFICKING POLICY

- h. The United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons of 2000,
- i. The United Nations Convention against Transnational Organized Crime of 2000.

2. Domestic legislations

- a. The Permanent Constitution of the State of Qatar of 2003 (Articles 18, 26 and 36),
- b. Law No. (15) of 2011 on Combatting Trafficking in Human Beings,
- c. Law No. (11) of 2004 promulgating the Penal Code (Articles 318, 321, 322 and 325),
- d. Law No. (14) of 2004 promulgating the Labour Law (Article 86),
- e. Law No. (15) of 2017 relating to Domestic Workers (Sections 3, 5 and 8).

6.2 Protection of Human Rights

Milaha is committed to protect and enhance human rights and to fight slavery and human trafficking and the related phenomenon such as forced labour, modern slavery, and child labour. Milaha takes all ethical issues seriously and is committed to providing services in a socially responsible way.

6.3 Zero tolerance to slavery and human trafficking

Milaha has a zero-tolerance approach to modern slavery and human trafficking issues occurring in its business dealings and activities or within its supply chains and expects the same high ethical and integrity standards from all its contractors, suppliers, and other business partners.

7. Review Frequency

The suitability and effectiveness of this document, as part of the Milaha Management System, will be evaluated on an annual basis and included within the management review or as specific situations warrant, or prior to significant operational change, or as a result from findings of Internal Audit.

8. Record Keeping

All records relating to the document and record control described in this document shall be maintained for a period not less than 5 years or specific requirement if greater by legislation or QFMA requirement

DATA PROTECTION POLICY

1. Introduction

Data protection is a prevalent business concern because of an ever-increasing number of regulations, both at domestic and international level, that require companies to be vigilant about data protection.

At Milaha data protection is everyone's responsibility. Milaha is committed to conduct business in adherence with applicable data protection laws and regulations in all the jurisdictions where Milaha operates (the "Data Protection Laws").

2. Purpose

This Policy establishes guiding standards designed to:

1. ensure compliance with the Data Protection Laws.
2. protect personal data and Company's Information relating to Employees, customers, partners and such third parties whose Data is processed by the Processor.
3. address the way Milaha processes personal and companies' information data and how data is stored.
4. minimise adverse impacts and protects Milaha' interests and to prevent any breach of Data.
5. demonstrate transparency and accountability to all stakeholders.

3. Scope

This Policy applies to all employees, officers, directors, and representatives of the Controller in the process of conducting business.

4. Legal Framework

This Policy seeks to ensure compliance mainly with the Data Protection Laws.

5. Compliance

1. All parties conducting official business for the Controller (Milaha personnel, Board members, volunteers, contractors, and consultants, etc.) must comply with this Policy.
2. The Controller's Data and information are the property of the Controller, not the property of Employees, and shall not be divulged without authorisation from the Controller.
3. Failure to comply with this Policy may result in punitive action against the Employee, including suspension or termination. Questions about this Policy shall be referred to the Data Protection Policy Manager.

DATA PROTECTION POLICY

6. Definitions

Company	means the legal entity whose data are being processed.
Company's Information	means any or all information relating to a legal entity.
Controller	means Milaha which, alone or jointly with others, determines the purposes and means of the processing of Personal Data and/or Company's Information.
Data	means any Data relating to the Individual or to the Company.
Data Breach	means breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data and/or Company's Information transmitted, stored or otherwise processed.
Data Protection Policy Manager	means the Senior Legal Counsel - Dispute Resolutions Risk & Compliance.
Data Subject	means the Individual or the Company whose Data is processed by the Processor.
Employee	means any person hired by Milaha who receives a salary from the company. This includes direct hires, contractors, trainees, crew, and divers.
Individual	means a natural person whose Personal Data are being processed. The Individual might be and Employee or a customer, supplier, consultant or any third party whose Data is processed by the Processor.
Milaha	means Qatar Navigation Q.P.S.C, its subsidiaries and affiliates located across the world, including but without limitation, Qatar Shipping Company W.L.L., Halul Offshore Services Company and Milaha Integrated Maritime And Logistics W.L.L.

DATA PROTECTION POLICY

Personal Data

as per the Data Protection Laws, include any information relating to an individual who is identified or can potentially be identified either from such data or from such data in conjunction with any other data.

Examples of Personal Data: name and surname, home address, email address, an identification card number.

Different pieces of information which collected together can lead to the identification of a person, also constitute personal data.

For additional clarification about what is considered Personal Data, contact the Data Protection Policy Manager.

Processing

means any operation or set of operations which is performed on Personal Data and/or on Company's Information or on sets of Personal Data and/or Company's Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor

means the person designated by the head of each business units (BU) or corporate units to process the Personal Data and/or Company's Information on behalf of the Controller.

Third Country

means any other country than the State of Qatar.

Third party

means a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Processor and persons who, under the direct authority of the Controller or Processor, are authorised to process Personal Data.

DATA PROTECTION POLICY

7. Principles

7.1 Principles relating to processing of data

Data shall be:

- a) Processed lawfully and in a transparent manner. Processing of Data shall be lawful, if one of the following situations apply:
 - i) The Individual has given consent to process his or her Data,
 - ii) Data processing is part of an agreement to which the Data Subject is a party to,
 - iii) Data Processing is mandatory to ensure compliance with laws and regulations,
 - iv) Data Processing is necessary for the performance of public interest activity,
- b) Collected for a specific and legitimate purpose and limited to what is necessary in relation to the purpose,
- c) Kept updated and accurate,
- d) Processed in a manner to ensure appropriate security against unlawful Processing, loss, or destruction.

7.2 Rights of the Individual

Everyone shall be entitled to protect the privacy of his or her Personal Data. The Processor may not process Personal Data without getting the approval of the Individual or Company unless the Processing is necessary for achieving a legitimate purpose for Milaha or to a Third Party to whom the Data is sent. To ensure transparent Processing, each Individual shall be entitled to get the following Data:

- i) the identity and the contact details of the Controller,
- ii) the purposes of the Processing,
- iii) the recipients of the Data, if any,
- iv) where applicable, the fact that the Processor intends to transfer the Data to a Third Country and/or Third Party,
- v) the period for which the Data will be stored,
- vi) the existence of the right to request from Milaha access to and rectification of Data accompanied by the evidence that proves the validity of the request,
- vii) in case Data has not been obtained from the Individual, from which source Data has been obtained,



DATA PROTECTION POLICY

- viii) the existence of the right to request to erase Personal Data where is no excuse to retain such data by the Processor and Data is no longer necessary.

Any Individual may at any time have access to his or her Personal Data and has the right to the following:

- i) to be notified of the processing of his Personal Data and the purpose of such Processing,
- ii) to be notified of any disclosure of inaccurate Personal Data.

However, the Processor is exempted from disclosing such information to the Individual in the following cases:

- i) If the disclosure may affect the commercial interest of the Controller,
- ii) If disclosure may affect the interests of another person,
- iii) If disclosure may entail the disclosure of the Personal Data of another Individual who does not approve such disclosure which may entail a material or moral damage to such Individual or any other Individual,
- iv) To protect the national and public security,
- v) To protect the international relations of the State,
- vi) To protect the economic or financial interests of the State,
- vii) The prevention of any criminal offense.

Processor shall keep a separate record of Data regarding the above-mentioned exempted cases.

7.3 Sensitive Personal Data

Sensitive Personal Data include Data such as racial origin, children or dependents, health or physical or psychological status, religious beliefs, marital status etc.

Except for the following Sensitive Personal Data, no Sensitive Personal Data shall be processed:

- i) Physical health,
- ii) Marital Status,
- iii) Children or dependents.

and such Sensitive Personal Data shall only be collected by the Controller's Human Resources Department strictly for its internal purposes only.

Sensitive Personal Data shall not be processed without the express written consent of the Data Subject.

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DATA PROTECTION POLICY

7.4 Data Security Risks

This Policy helps to protect the Controller from the following security risks:

- i. Breaches of confidentiality in case information is being divulged inappropriately,
- ii. Reputational damage caused in case of hackers' access to Data.

8. Roles and Responsibilities

- i. At Milaha, Data protection shall be concern of all of Milaha's employees, leadership and stakeholders.
- ii. The roles and responsibility of each of the stakeholders are listed in Appendix - "1" attached hereto.
- iii. Each stakeholder shall ensure that the Data is handled and processed in strict compliance with this Policy.

9. Review Frequency

The suitability and effectiveness of this Policy, as part of the Milaha Management System, will be evaluated on an annual basis and included within the management review or as specific situations warrant, or prior to significant operational change, or as a result of findings of Internal Audit.

10. Record-keeping

All Records related to this Policy shall be maintained by Legal Affairs in accordance with the Document and Record Control Procedure (QM-PR-002) for a period not less than 5 years.

11. References

This Policy is aligned with the following:

- i) Qatari Law No. (13) Of 2016 on the Protection of Personal Data Privacy
- ii) The European Union General Data Protection Regulation
- iii) The UAE Federal Data Protection Law No. (45) of 2021

DATA PROTECTION POLICY

Appendix - "1"		
	Stakeholders	Role & Responsibilities
1.	Milaha Board of Directors	<ul style="list-style-type: none"> a) To approve this Policy. b) Delegate the power to ensure compliance of this Policy to the Controller's Executive Management.
2.	Executive Management	<ul style="list-style-type: none"> a) Shall ensure the implementation of this Policy and to allocate the adequate resources for such implementation.
3.	Data Protection Policy Manager	<ul style="list-style-type: none"> a) Ensure breaches of Data protection is resolved effectively and in a timely manner. b) Ensure implementation of this Policy. c) Develop, implement, communicate, periodically review, maintain, and monitor this Policy.
4.	Human Resources Department	<ul style="list-style-type: none"> a) The head of the Human Resources Department shall designate a particular person as the Processor. b) Processor shall be fully aware and familiar with the requirements under this Policy. c) Ensure that the Data relating to employees (or third parties) shall be treated as highly confidential. Processing of such Data shall be done in compliance with this Policy. d) Ensure that Processing of Sensitive Personal Data is done strictly in accordance with Clause 7.3 herein.
5.	Business Units (include all subsidiaries and affiliates listed under Milaha's Legal Structure)	<ul style="list-style-type: none"> a) The head of each of the respective Business Unit shall designate a particular person as the Processor. b) The Processor shall ensure that Data is processed honestly and transparently and in strict compliance with this policy. c) The Processor shall in consultation with the Data Protection Policy Manager: <ul style="list-style-type: none"> i. identify the Data Subjects, ii. identify the Data that would be required to be collected, iii. identify the methods of Processing and retaining the Data.

DATA PROTECTION POLICY

		<ul style="list-style-type: none"> d) The Processor shall be responsible in ensuring that a process or procedure is implemented for Data Protection within the respective Corporate Unit in compliance with this Policy. e) The Processor shall immediately notify or alert the Data Protection Policy Manager of any breach of this Policy. f) Have dialogs (as and when required) with the Data Protection Policy Manager to recommend improvements or changes to this policy.
6.	Corporate Units (not specifically mentioned herein)	<ul style="list-style-type: none"> a) The head of each of the respective Corporate Units shall designate a particular person as the Processor. b) The Processor shall ensure that Data is processed honestly and transparently and in strict compliance with this policy. c) The Processor shall in consultation with the Data Protection Policy Manager: <ul style="list-style-type: none"> i. identify the Data Subjects, ii. identify the Data that would be required to be collected, iii. identify the methods of Processing and retaining the Data. d) The Processor shall be responsible in ensuring that a process or procedure is implemented for Data Protection within the respective Corporate Unit in compliance with this Policy. e) The Processor shall immediately notify or alert the Data Protection Policy Manager of any breach of this Policy. f) Have dialogs (as and when required) with the Data Protection Policy Manager to recommend improvements or changes to this policy.

DATA PROTECTION POLICY

7.	Milaha IT Department	<ul style="list-style-type: none"> a) Ensure all systems servers and equipment used for storing Data meet the IT security standards and are designed to protect stored Data from any security breach. b) Perform periodic checks to ensure security hardware and software are properly functioning. c) Recommend improvements or changes to this policy. d) Ensuring that the Data created or received by their department is maintained in compliance with this policy. e) Provide support and IT infrastructure to ensure that Data is accessible, legible, complete, and protected. f) Back up and archiving electronic Data within the Milaha IT infrastructure, which has the necessary controls to protect against unauthorised access to, modification, loss, damage, or deletion of Data.
8.	Milaha Corporate Communications Department	<ul style="list-style-type: none"> a) Ensure that marketing activities are in compliance with this Policy. b) Specific consent of the Data Subject is obtained if photographs are to be taken or published (for whatever reason) either in or outside of the Controller's premises. c) Ensure not to send any electronic communication for the purpose of direct marketing to the Individual unless his prior approval is obtained. Such communication shall include the possibility for the Individual to request from Milaha to stop sending him such communications or to withdraw his consent to send them.
9.	Milaha Security	<ul style="list-style-type: none"> a) Know that Personal Data recorded on CCTV system are subject to this Policy and shall be processed in accordance with this Policy.

DATA PROTECTION POLICY

10.	Milaha Legal Affairs Department	<ul style="list-style-type: none"> a) Shall ensure that the Controller is kept updated of any changes or updates in the laws relating to Data protection. b) Shall ensure that this policy complies with the legal requirements in force.
11.	Internal Audit	<ul style="list-style-type: none"> a) Shall audit the Controller's compliance with this Policy.
12.	All Employees	<ul style="list-style-type: none"> a) Shall comply with this Policy. b) Keep Data secure by taking sensible precautions by following the below guidelines: <ul style="list-style-type: none"> i) Data shall not be disclosed to unauthorised persons, ii) Data printouts should not be left where unauthorised people could have access to them, iii) Data printouts should be shredded when no longer required, iv) When Data is stored electronically, it must be protected from unauthorised access, accidental deletion or disclosure, v) Employees should ensure that screens of their computers are always locked when left unattended, vi) Employees should take reasonable steps to keep Data accurate and updated. c) Reporting incidents immediately to their supervisors if Data is deleted, removed, altered, lost or destroyed. d) Handing over any or all Data in their possession to their superior before their last day of employment with the Controller.

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SUSTAINABLE PROCUREMENT POLICY

As part of its wider commitment to managing environmental impacts, Milaha is working towards achieving sustainable operations in line with national standards. A key element to achieving this is the implementation of meaningful measures regarding sustainable procurement.

Milaha's policy on sustainable procurement is to:

- comply with relevant environmental legislation and other requirements.
- communicate our expectations with stakeholders (internal and external) and raise awareness amongst our suppliers, and
- consider environmental, social, and economic implications when making procurement decisions.

To achieve this, Milaha will:

- Request all key suppliers accept to comply with the Milaha Supplier Code of Conduct,
- influence our suppliers and contractors to align to the same sustainability standards in their business operations, and
- offer small and medium enterprises, social enterprises, and local businesses the opportunity to participate in our supply chain.