RESPONSIBLE BUSINESS

We believe that how we operate is just as important as what we deliver. Responsible business practices are embedded across every part of our operations—from corporate governance and regulatory compliance to sustainable procurement, waste management, and climate risk planning.

Through strong internal controls, clear policies, and a commitment to national and global priorities, we ensure our work contributes to long-term value—for our clients, our people, and the communities we serve.



Sets the expectations and quides our ethical approach



Waste management

We believe that how we operate is just as important as what we deliver.



Regulatory compliance
Policy applies to all employees is declared



planning
Ensuring resilience
against climate
change



controls

Declaring
external business
interests



Sustainable procurement

Any occurring critical concerns are communicated



Internal controls

Declaring external
business interests

Governance & Compliance

All projects are executed under our ISO 9001:2015–certified Quality Management System, ensuring quality, consistency, and accountability across all operations. We are fully aligned with national priorities and global frameworks, including:

- UAE Net Zero by 2050 Strategy
- UAE Energy Strategy 2050
- We the UAE 2031
- UAE Centennial 2071
- Dubai Urban Master Plan 2040

- Dubai Zero Waste by 2030
- United Nations Sustainable Development Goals (SDGs)
- Ministry of Human Resources and Emiratisation (MOHRE)
- Jebel Ali Free Zone Authority (JAFZA)

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CORPORATE POLICIES & INTEGRITY SYSTEMS

To ensure ethical and sustainable operations, all employees are governed by a robust set of policies available via our HR platform, Yomly, and reinforced through onboarding and annual training.

Core policies include:

- Code of Conduct
- Sustainability Management Policy
- **©** CSR Policy
- Internet & Email Use
- + Health & Wellbeing Policy
- HSE Manual

- Annual Leave & Working Hours
- <a>Solid Waste Management
- Sustainable Purchasing
- Green Cleaning
- Summertown Sustainability Standard (launching 2025)

FEATURED POLICY: CODE OF CONDUCT

Our Code of Conduct (CoC) reflects our commitment to ethical, legal, and responsible business practice. It addresses:

Conflict of interest

Anti-corruption and bribery

Gifts and hospitality

Data protection and confidentiality

Non-discrimination and diversity

Occupational health and safety

External Business Interests (EBIs)

All employees, including our corporate leadership, formally acknowledge the CoC each year. Oversight is led by our Managing Director. "Critical concerns" (e.g., human rights breaches, environmental violations, serious misconduct) are escalated immediately and reviewed weekly at corporate team meetings.

Reporting period outcome:

- **Tero confirmed incidents of corruption**
- * Zero incidents of non-compliance in marketing or service delivery

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- Sets the expectations and guides our ethical approach to our day-to-day operations by focusing on areas such as conflict of interest, anti- corruption, gifts and hospitality, managing sensitive information, non-discrimination, customer relationships, health & safety, and diversity
- Policy applies to all employees and is declared annually by 100% our employees and Corporate Team
- Any occurring **critical concerns are communicated** within weekly Management Team meetings
- All External Business Interests (EBIS) need to be declared in writing to the MD, HR Director, and direct manager













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986,027 KG

TOTAL WASTE

67%

RECYCLED

33%

DISPOSAL







WASTE MANAGEMENT IS A KEY PART OF OUR SUSTAINABILITY COMMITMENT,
HELPING US MINIMISE ENVIRONMENTAL IMPACT AND PROMOTE
RESPONSIBLE RESOURCE USE ACROSS ALL OUR PROJECTS

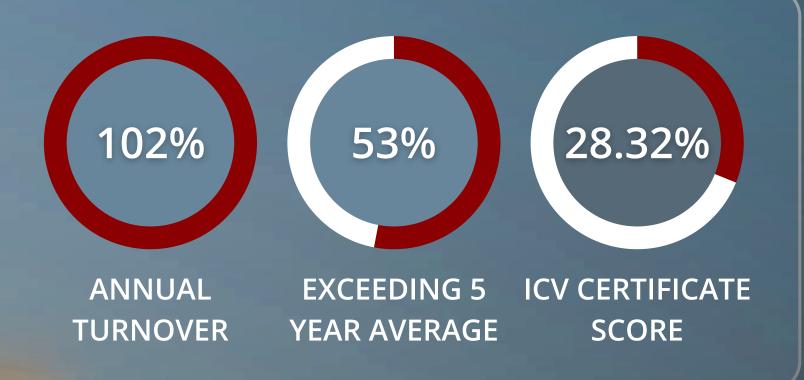
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IN COUNTRY VALUE (ICV)

In 2025, Summertown achieved a 102% increase in annual turnover, exceeding our 5-year average by 53%. We hold an ICV certificate with a score of 28.32%, reinforcing our commitment to local sourcing, job creation, and UAE economic development.



RESPONSIBLE RECRUITMENT

We prioritise the procurement of sustainable and locally manufactured materials, assessing all new suppliers and subcontractors through surveys and on-site evaluations.

Every order follows a "4-eye to 6-eye process" to ensure transparency and value:

- Cost comparisons with at least 3 quotations
- Cross-checked by Quantity Surveyors, Project Managers, and contractors
- All framework contracts include responsible sourcing clauses

WASTE MANAGEMENT

All projects are executed under our ISO 9001:2015-certified Quality Management System, ensuring quality, consistency, and accountability across all operations.

We are fully aligned with national priorities and global frameworks, including:







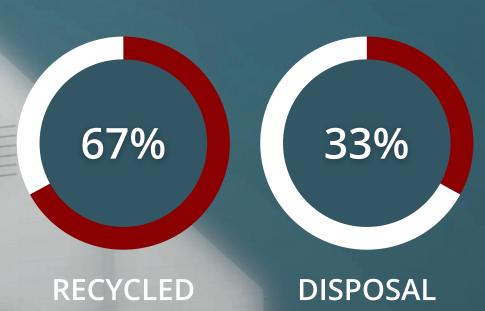




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PROJECT WASTE

Waste Management is a key part of our sustainability commitment, helping us minimise environmental impact and promote responsible resource use across all our projects





RISKMANAGEMENT

We implement a comprehensive Hazard Identification & Risk Assessment system, led by our HSE Manager, and supported by:

- ★ Project-specific Training Needs Analysis
- ★ Dedicated Risk Registers for each project
- ★ Method Statements and Risk Assessments tied to site-specific hazards
- Continuous supplier engagement on risks such as working at height, chemical handling, tool safety, and fire prevention

All employees and contractors are encouraged to report hazards immediately, with rapid mitigation procedures in place.

RESPONDING TO CLIMATE RISK

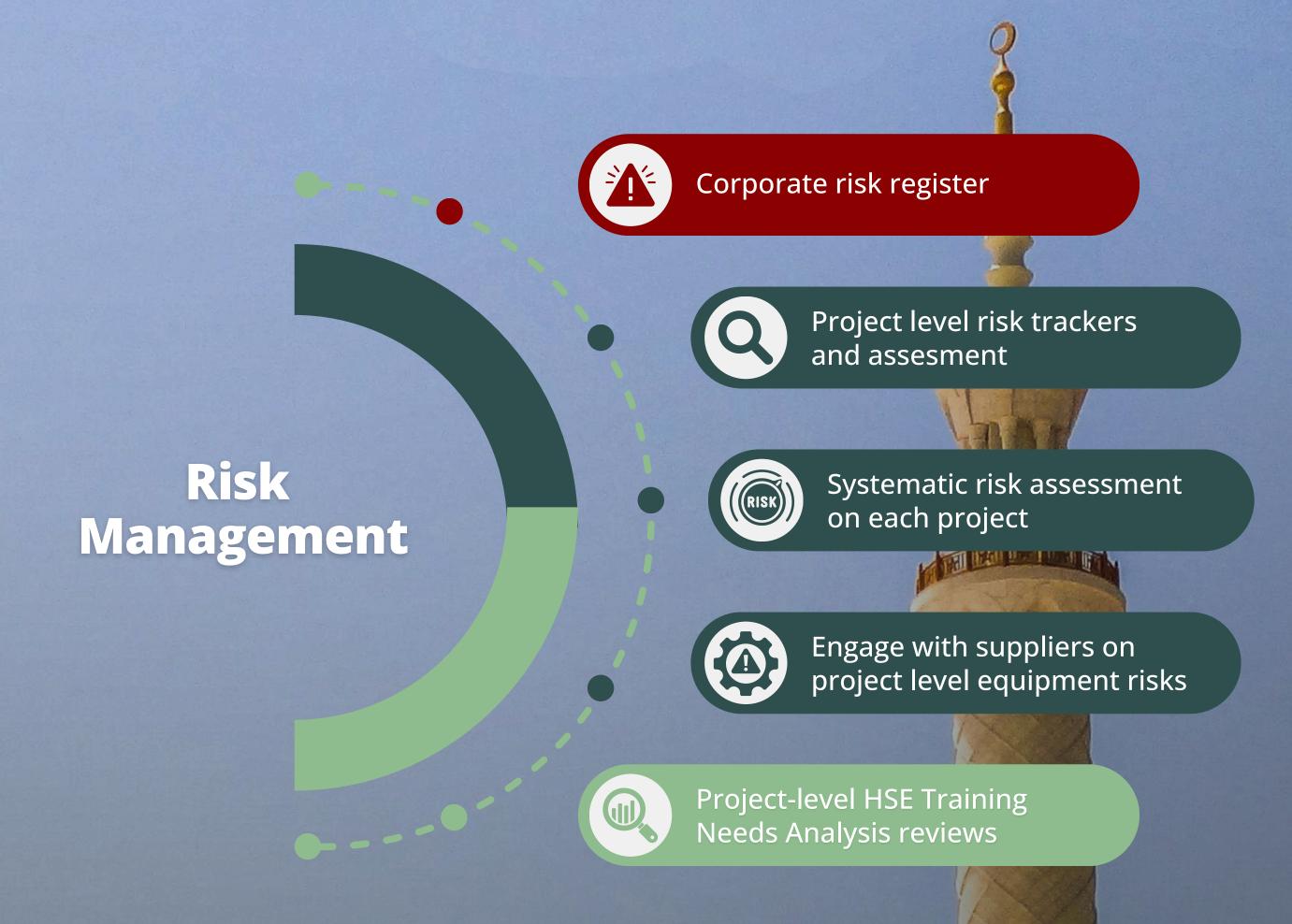
Climate change presents real risks—and real opportunities. As a UAE-based fit-out specialist, we're proactively integrating climate considerations into how we plan, advise, and deliver projects.

Key Risks Identified:

- Rising costs of low-carbon and sustainable materials
- ★ Market demand for ESG-aligned, certified green spaces

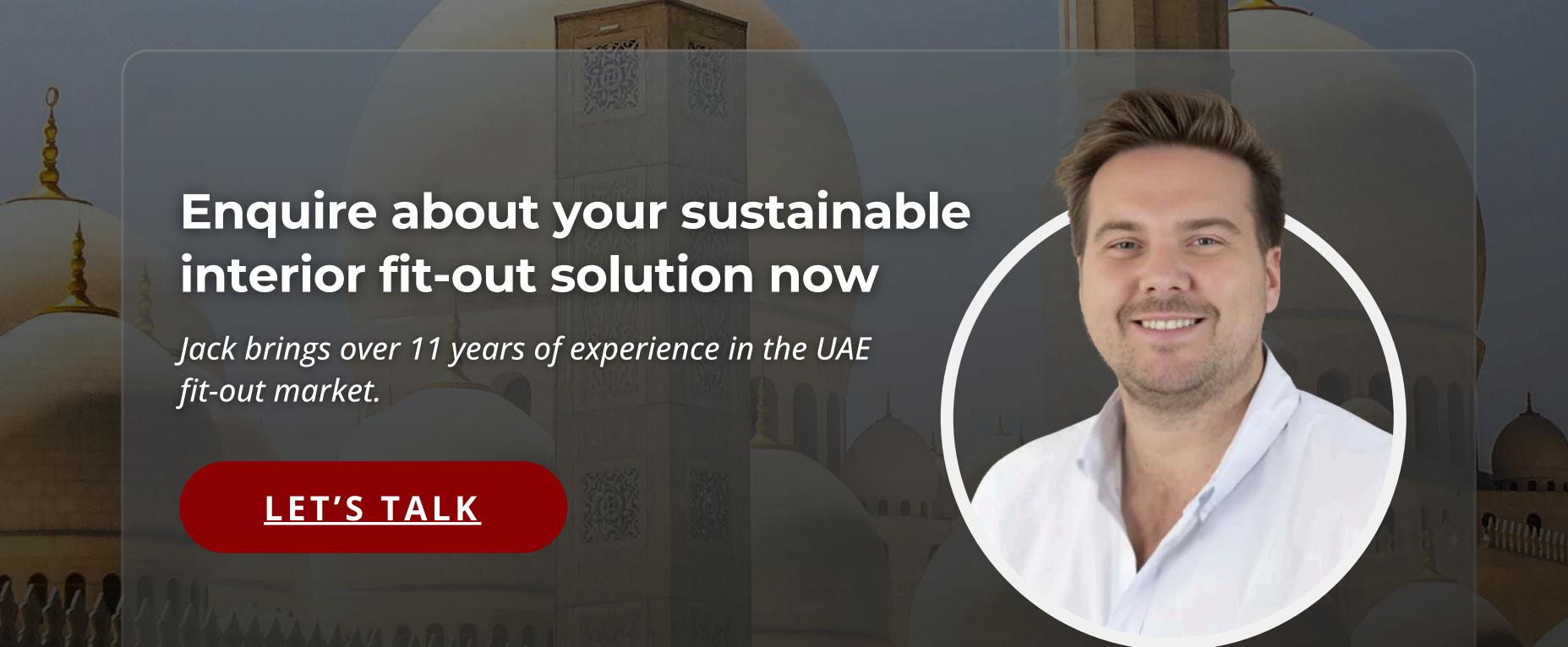
Rather than react, we are evolving. With a strong track record in LEED-certified projects and a clear roadmap through our Summertown Sustainability Standard, we are well-positioned to lead the shift toward sustainable interiors in the region.

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