



ANTI-FRAUD POLICY

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For Amendment and Deletion Only

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ANTI-FRAUD POLICY

1. INTRODUCTION

The purpose of this policy is to safeguard the assets, reputation, and interests of Emaar Group (Emaar Properties PJSC, its subsidiaries and affiliates, collectively referred to as “Emaar Group”) by establishing a clear framework for preventing, detecting, and responding to fraud and other related unethical activities. This policy aligns with our commitment to ethical business conduct, transparency, and accountability.

2. OBJECTIVE

The purpose of this Policy is to provide clear guidelines for all legal entities and personnel within Emaar Group, and for all business partners engaged in providing services to Emaar Group, to prevent, detect, and respond to fraudulent activities effectively, ensuring integrity and transparency in all operations.

3. SCOPE

This policy applies to all employees, officers, directors, contractors, vendors, and agents acting on behalf of Emaar Group, regardless of location or role. It covers all areas of fraud risk, including but not limited to financial fraud, procurement fraud, cyber fraud, and asset misappropriation.

4. POLICY STATEMENTS

At Emaar Group, we are committed to maintaining the highest standards of integrity, transparency, and ethical behaviour in all our business operations. Fraudulent activities, corruption, and unethical practices are contrary to our values and undermine trust with stakeholders, including employees, customers, investors, and partners. The following policy statements outline Emaar Group's zero-tolerance approach to fraud and commitment to fraud risk management.

4.1 Zero Tolerance for Fraud

Emaar Group has a zero-tolerance stance on all forms of fraud, corruption, and unethical conduct. Any individual or entity found engaging in fraudulent behaviour will be subject to disciplinary action, up to and including termination of employment or contract, and may face legal prosecution. All fraud-related incidents will be investigated thoroughly by the Group Internal Audit team (with support from any other team as may be relevant) and appropriate measures will be taken to mitigate potential fraud risks.

4.2 Ethical Responsibility

All employees, contractors, vendors, and partners of Emaar Group are expected to act with integrity and adhere to the highest standards of ethical behaviour. Individuals are responsible for upholding this policy and must avoid any conduct that could result in fraud, deception, or conflict of interest. Ethical behaviour is central to our organizational culture, and violations will not be tolerated.

4.3 Commitment to Fraud Prevention

Emaar Group is committed to preventing fraud through the implementation of robust internal controls, ongoing employee training, and a culture that promotes accountability. Prevention is our first line role, and we will continuously enhance our control mechanisms to address evolving fraud risks.

4.4 Proactive Fraud Risk Management

Emaar Group is dedicated to identifying, assessing, and mitigating fraud risks throughout the organization. Regular fraud risk assessments will be conducted to identify vulnerabilities, and corrective actions will be implemented to strengthen our control environment. All departments are responsible for managing and mitigating fraud risks within their respective areas.

4.5 Open Reporting and Whistleblower Protection

Emaar Group encourages all employees and stakeholders to report any suspected fraud, corruption, or unethical behaviour without fear of retaliation. We provide confidential and anonymous reporting mechanisms to ensure that everyone can safely report concerns. Whistleblowers are protected against retaliation, and their identity will be kept confidential to the fullest extent possible.

4.6 Swift and Fair Response to Fraud

Any reported or detected incidents of fraud will be addressed promptly through a structured investigation process carried out by Group Internal Audit. Emaar Group is committed to ensuring that all fraud investigations are conducted in a fair, thorough, and impartial manner. Appropriate corrective and disciplinary actions, including legal proceedings, will be taken against individuals or entities involved in fraud.

4.7 Legal and Regulatory Compliance

Emaar Group complies with all applicable laws and regulations related to fraud, bribery, and corruption. Any fraud incidents that meet legal reporting thresholds or requirements will be promptly reported to regulatory authorities. We are committed to cooperating fully with external regulatory bodies during investigations and audits.

4.8 Continuous Improvement of Fraud Control Framework

Emaar Group is dedicated to the continuous improvement of its fraud control framework. We will review and update our policies, procedures, and internal controls regularly to ensure they are aligned with industry best practices and are capable of addressing emerging fraud risks. Training programs will be updated periodically to reinforce the importance of fraud prevention and ethical conduct.

5. FRAUD TRIANGLE

The fraud triangle describes the three key factors that could possibly contribute an individual to commit fraud: opportunity, pressure, and rationalization. Emaar, as an organization understands that all these factors are appropriately and sufficiently addressed by way of Anti-Fraud framework and overall organizational policies:

- 5.1 Opportunity:** This refers to a situation where an individual sees the opportunity to commit fraud by circumventing or exploiting weaknesses in existing fraud countermeasures.
- 5.2 Pressure:** This refers to a situation where an individual mindset is driven to commit fraud due to various motivational or pressure factors such as financial strain or personal obligations.
- 5.3 Rationalization:** This refers to an individual's justification for committing fraud.



6. ROLES AND RESPONSIBILITIES IN FRAUD RISK MANAGEMENT

Fraud risk management is a shared responsibility across various levels of the organization. The following outlines the specific roles and responsibilities of key stakeholders within Emaar Group in relation to fraud prevention, detection, and response:

6.1 Board of Directors

The Board is setting the Tone at the Top and responsible for fostering an ethical culture within the organization. By promoting integrity, transparency, and accountability, the Board sets an example that deters unethical behaviour and fraud.

6.2 Audit Committee

The Audit Committee provides oversight of the fraud risk management framework; reviews results of fraud incidents and ensures the effectiveness of internal controls. It advises management on improvements and monitors compliance with relevant laws and regulations.

6.3 Senior Management

Senior management are responsible for fostering a culture of integrity, implementing robust internal controls, and allocating resources for fraud prevention. They must respond promptly to fraud incidents, support investigations, and enforce corrective measures. Additionally, they are accountable for defining and ensuring compliance with internal controls, policies, and procedures. Fraud prevention remains a primary responsibility of senior management.

6.4 Group Internal Audit

Group Internal Audit assesses the adequacy of internal controls, conducts fraud risk assessments, and leads investigations into suspected fraud. It reports key findings to senior management and the Audit Committee, recommending improvements to prevent and mitigate fraud.

6.5 External Audit

External Audit provides an independent assessment of the organization's financial statements and internal controls based on the audit materiality thresholds. It reports any significant risks or findings to the Audit Committee and ensures compliance with regulatory requirements. The role of the external auditor in an Anti-Fraud framework is often limited and primarily focused on assessing financial statements rather than explicitly detecting or preventing fraud.

6.6 People & Performance Department

People & Performance promotes ethical conduct, conducts background checks, deliver fraud awareness trainings in coordination with Group Internal Audit and manages disciplinary actions for fraud-related incidents. It also ensures whistleblower protection to foster a safe reporting environment.

6.7 Legal Department

The legal department plays a key role in advising on fraud-related legal matters, ensuring compliance with laws and regulations, reviewing relevant documentation, and supporting the investigation process to safeguard Emaar Group's legal interests.

6.8 Investigation Committee

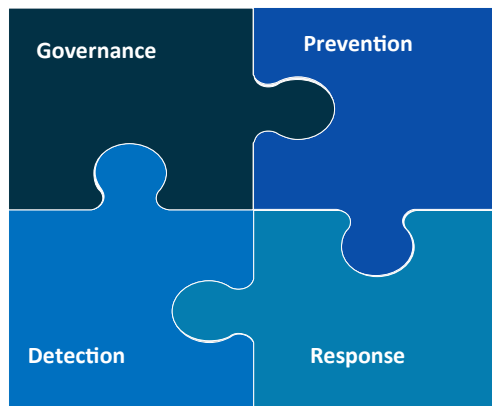
The investigation committee in complex fraud investigation cases shall be formed if deemed necessary by Group Chief Audit Officer (GCAO). It can be a cross functional committee to ensure that no bias exists. The committee shall supervise the proceedings and will review the evidence collected.

6.9 Employees

Employees must adhere to the organization's policies, report any suspicious activity, and act ethically in their roles. They are responsible for participating in fraud awareness training and supporting fraud investigations when necessary. Further employees are responsible to report incidents of fraud or perceived fraud.

7. COMPONENTS OF EMAAR ANTI-FRAUD FRAMEWORK

Emaar Anti-Fraud Framework has following components. It is the responsibility of all respective officials to ensure effective implementation and operation of each the below components:



7.1 Governance

Governance is an essential pillar for fraud control as it includes the Policy of laws, rules, policies, and practices that determine how Emaar implements the Anti-Fraud Policy. The development of an Anti-Fraud and integrity culture plays an important role in reducing fraud and in helping to detect and deal with it if it occurs. The Anti-Fraud and integrity culture at Emaar aims to ensure that a sustainable ethical culture is embedded and exemplified by Senior Management.

7.2 Fraud Prevention

Fraud prevention reduces the risk of fraud occurring at Emaar through the implementation of adequate mechanisms and strategies. These mechanisms support Emaar to prevent losses through fraud and deter fraudulent conduct from occurring in the first instance. Some of the key fraud prevention mechanisms established by Emaar are:

- Fraud Risk Assessment (FRA) – Periodic FRAs are carried out by Group Internal Audit in line with Fraud Risk Assessment procedures defined in Anti-Fraud procedures document.
- Policies and procedures – Policies and procedures have been developed and implemented to deter fraud and enhance Emaar’s internal control environment.
- Strategies and mechanisms are implemented at Emaar to prevent and deter fraud.
- Workforce screening to identify and minimize Emaar’s exposure to fraud and misconduct.
- Due diligence activities for any external parties, including contractors and their sub-contractors, suppliers, vendors, joint operators.
- Access restrictions to systems and applications.
- Maintenance and periodic review of the Authority matrix, operational procedures.
- Periodic review of internal controls to identify gaps and remediate them.

7.3 Fraud Detection

- 7.3.1. Fraud detection is undertaken to allow Emaar to identify and prevent any unauthorized or irregular activities. Emaar Employees should be alert to the possibility of fraud and ensure timely reporting of any suspicious activities. Fraud may also be highlighted because of specific and/or unscheduled management checks or be brought to management's attention by an external party. Additionally, irregularities occasionally may become known during audit engagements.
- 7.3.2. **Whistleblowing hotlines and complaints** – Emaar has established a Whistleblower Policy for Employees and other key stakeholders who have concerns in relation to potential violations of applicable laws, standards, or procedures or any unethical behavior in connection with the business of Emaar. Concerns can be reported in confidence and without risk of retaliation. Please refer to the Whistleblower Policy for further details.
- 7.3.3. **Transactional, process and controls testing** – Emaar conducts FRAs periodically and monitors fraud risks and controls. In addition, risk-based audits are conducted by Group Internal Audit and any suspicious activity is flagged and reported for further investigation. Business transaction reviews and transactional testing is carried out for key business functions such as Finance, Procurement and Payroll to detect abnormal transactions or activities.
- 7.3.4. **Periodic evaluation of the Policy** – Emaar will regularly review the Anti-Fraud Policy to ensure its effectiveness in the business environment in which it operates. The following activities are undertaken to ensure the applicability and relevance of the Anti-Fraud Policy.
- Review of the Anti-Fraud Policy considering significant changes in Emaar's business conditions, recently detected fraud or misconduct and results of the most recent FRAs.
 - Develop new strategies from the outcomes of recently detected fraud incidents; and
 - Update the policy with recent local and/or international Anti-Fraud leading practices and regulations.

7.4 Fraud Response

Fraud response is the implementation of the protocols to respond to incidents of fraud or any other irregularities on a timely basis. The overarching goal of the fraud response mechanism is to protect Emaar from the economic, reputational, and legal risks and impacts associated with the incidence of fraud. The Investigations will be undertaken by the Group Internal Audit while maintaining the highest confidentiality and ensuring all actions, evidence and meetings are recorded appropriately. The GCAO will assign the fraud investigation to appropriate team members as per the nature of the investigation and will review and approve the final investigation report.

- 7.4.1. **Interdependence of components of Anti-Fraud Policy:** The components described in section 6.1 to 6.9 are interlinked, and each plays a significant role in combating fraud and promoting resilience within Emaar. The Anti-Fraud Policy is only effective when these components are integrated with the wider ethical/integrity culture, corporate governance, and risk management.

8. FRAUD PROSECUTION & POST INVESTIGATION ACTIONS

- 8.1 Any offenders who commit an act of fraud are subject to disciplinary action, including termination with cause, criminal prosecution, or both. The Company will pursue full recovery of all losses resulting from an act of fraud. Any litigation involving employee, contractors and vendors will be referred to relevant internal stakeholders as applicable such as Legal and People & Performance departments.
- 8.2 All employees shall comply with all data requests made by Group Internal Audit to extend support and/or evidence for disciplinary action or legal matters.
- 8.3 If an investigation concludes wrongdoing of an internal Emaar resource and/or employee, recommendation for appropriate disciplinary actions (including termination) will be reviewed by the Business Head (CEO, CFO or Head of Department) with representatives from People and Performance Department and Legal and, if necessary, by the outside Counsel before any such action is taken.

9. TRAINING AND AWARENESS

Anti-Fraud training and awareness is key to ensuring all employees are informed about fraud and their responsibilities in relation to fraud control. All Employees may be required to attend Anti-Fraud training and awareness sessions on commencement with Emaar and on an ongoing basis.

People & Performance department in liaison with Group Internal Audit shall arrange Anti-Fraud and fraud Risk Management training sessions periodically.

10. OWNERSHIP OF POLICY, ADMINISTRATION AND REVIEW

- 10.1 GCAO under the delegation of Emaar Audit Committee, as mandated by the Board of Directors, will be responsible for the administration, revision, interpretation and application of this Policy. At the discretion of the Audit Committee, responsibilities of the Audit Committee created by this Policy may be delegated to any member of the Audit Committee or to the Group Chief Audit Officer.
- 10.2 GCAO shall ensure that the policy is updated and implemented effectively across Emaar Group.
- 10.3 The Audit Committee and/or the GCAO may delegate to the People and Performance Department the responsibility for employee matters reported under this Policy which do not, in any way, concern the audit, accounting, or operational matters. The People & Performance will share the final outcome of the investigation with GCAO for its record and other risk assessments.
- 10.4 This Policy is to be reviewed periodically by the Audit Committee and modified as deemed necessary.
- 10.5 This Policy is to be read in conjunction with the Anti-Fraud Procedures, Emaar Code of Conduct, Anti-Bribery & Anti-Corruption Policy, Anti-Money Laundering and Whistleblowing Policies.

GLOSSARY

In this Policy, as hereinafter defined, the following terminologies shall have the meaning hereby assigned to them:

Business Partners: Includes any and all third parties who are engaged in business for or on behalf of or with Emaar Group or any legal entity within Emaar Group, which may include without limitation representatives, agents and agencies, consultants, joint venture partners, contractors, service providers, customers, and suppliers.

Breach / Misconduct: Any Breach of any law, regulation, Policy or procedure or any other suspected irregularity.

Concern: Any question or suspicion about any incident of fraud, corruption or other unethical or serious wrongdoing (involving either Employees or external parties) that has occurred or may occur.

Corrupt practice: Giving, offering, receiving, or soliciting, directly or indirectly, anything of value to influence inappropriately the actions of another party with a dishonest intent.

Disciplinary Action: An action taken against an Employee to alert, correct behaviours, and/or deter them from future violations or instances of wrongful behaviour. Disciplinary Action may range from coaching to termination and shall be in accordance with the Human Capital & Emiratization Policy.

Employee: An Employee of Emaar, which includes temporary, permanent, full-time and part-time Employees.

Fraud: Any illegal act characterized by deceit, concealment, or violation of trust to secure an unlawful or unfair gain, including the embezzlement of monies or similar.

Fraud Prevention: Strategies designed to proactively reduce or eliminate internal or external frauds.

Fraudulent practice: Any omission or act, including a misrepresentation that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.

Investigation: The review and analysis of the factual, legal, and ethical bases of a Concern, which may include interviews, review of documents and data, site visits or receipt of advice from external advisors.

Policy: The Anti-Fraud Policy outlines the principles, responsibilities, and measures established by Emaar Group to prevent, detect, and respond to fraudulent activities. It serves as a framework to uphold ethical standards, safeguard organizational assets, and maintain trust with stakeholders.

Whistleblowing: Act of reporting suspected, or actual unethical conduct or wrongdoing witnessed by a Whistleblower in the workplace.

Whistleblower: Is an employee or business partner who makes a disclosure or report of any wrongdoings under this Policy.