

Responsible Brand Representation Policy

Table of Contents

1. Introduction.....	2
1.1. Scope.....	2
2. Responsible Brand Governance (Quality Procedure and Brand Policy).....	3
2.1 Commitment to Ethical Brand Practices.....	3
2.2 Responsible Brand Representation.....	3
2.3 Communications and Stakeholder Engagement – Adherence to Sustainability Practices.....	4
2.3.1 Environmental Impact.....	4
2.3.2 Social Responsibility.....	4
2.3.3 Governance Standards.....	4
2.4 Respecting Customer Privacy.....	5
3. Training & Awareness.....	5
4. Policy Governance.....	5

1. Introduction

Emaar Properties P.J.S.C and its subsidiaries (collectively referred to as the “**Group**”, “**Emaar**”, “**We**”, “**our**” or “**us**”) are dedicated to promoting their brand, goods, and services in a responsible and ethical manner. Central to this approach is the alignment of our corporate brand growth practices with our sustainability and business objectives, as we continue to enhance the daily lives of our clients. We are committed to honesty and transparency in how we present and deliver our products and services.

This Responsible Brand Representation Policy (the “**Policy**”) is established to guide employees and representatives of Emaar in maintaining a consistent and ethical representation of our brand. The Policy aims to uphold Emaar’s reputation and foster trust with clients and the public. All employees and representatives of Emaar are expected to adhere to the rules and guidelines set forth herein.

Our service providers, suppliers, vendors, and distributors are selected through a procurement framework and are required to comply with all policies related to our brand, goods, and services. They must also sign a non-disclosure agreement (NDA) and ensure that data is managed and protected in line with our data processing agreement (DPA).

As ESG (Environmental, Social, and Governance) trends and standards continue to evolve alongside emerging risks and opportunities, it is essential to align our brand advertising and communication of our products and services with the Group’s environmental, social, and governance (ESG) strategy principles. Accordingly, all Emaar’s interns, employees, and representatives are required to complete mandatory training on this policy as part of their onboarding, when transferring across different areas of Emaar, or when assuming a higher role. This training covers responsible communication practices and ethical brand growth standards. Refresher training will be provided as needed to ensure continuous awareness and compliance. Training records will be maintained by the relevant Emaar’s Human Resources Department, and any training conducted during the year, including those on responsible marketing, advertising, and sales, will be disclosed in the annual report as appropriate.

1.1 Scope

This Policy applies to all Emaar’s employees, interns, representatives and third-party partners who represent the Emaar brand. In particular, it is mandatory for employees in customer-facing roles, or those involved in brand representation, communications, advertising, or sales, to understand and comply with the requirements of this Policy.

2. Responsible Brand Governance (Quality Procedure and Brand Policy)

2.1 Commitment to Ethical Brand Practices

At Emaar, we are committed to upholding the highest standards of ESG principles in all aspects of our brand representation. Sustainability, ethical practices and social responsibility are integral to our brand, and we ensure that our brand reflects our core values and contributes positively to the communities we serve. We aim to inspire trust, strengthen relationships, and create long-term value through responsible communications and actions.

Our commitments include:

1. Honesty

We provide factual, clear, and explicit information about our products and services. All communications intend to inform rather than mislead.

2. Responsibility

We aim to deliver reliable products and services while supporting social causes, contributing to communities, respecting our clients, and protecting the environment in partnership with our Group ESG Department through sustainable practices.

3. Transparency

We ensure accuracy and clarity across all communication channels, keeping contents simple and accessible to avoid ambiguity or misrepresentation.

4. Inclusivity

Our communications embrace diversity and inclusion by being culturally sensitive and accessible to people with different needs, ensuring broad and meaningful reach.

2.2 Responsible Brand Representation

At Emaar, we take pride in presenting our brand, products, and services responsibly. Our focus is not on traditional marketing, but on building trust through authentic communication, transparency, and delivering real value to our customers.

Integral to our approach is ensuring that all forms of communication, from brand representation to customer engagement, align with our sustainability and business objectives. We are committed to providing accurate, clear, and culturally sensitive information that supports sustainable lifestyles and reflects our values.

To this end, we ensure that:

- All communications, whether verbal or written, must reflect Emaar's values and commitment to excellence.
- Service providers, suppliers, vendors, and distributors engaged in promotional or communication-related activities adhere to Emaar's policies and sustainability standards.
- Campaigns are mindful of cultural sensitivities across jurisdictions and regions.
- Communications directed at minors are responsible and ethical.
- Labelling and product or service information is clear, transparent, and enables informed decision-making.
- Content used respects third-party copyrights.

2.3 Communications and Stakeholder Engagement – Adherence to Sustainability Practices

Emaar is dedicated to advancing a sustainable future by embedding responsible practices across our communications and stakeholders' engagement activities, in collaboration with our assets and partners whenever practicable.

2.3.1 Environmental Impact

Emaar's Corporate Brand Growth Department, in alignment with Emaar's ESG Strategy team, recognises the importance of minimising our environmental footprint and is committed to:

- Prioritising digital channels and reducing reliance on paper-based materials.
- Using resources efficiently and responsibly, including promoting recycling, minimising waste, reusing wherever possible and lowering energy consumption per unit.
- Ensuring responsible use of social media to avoid harmful or misleading content.
- Favouring in-house production and partnering with locally based vendors and contractors to reduce transportation emissions and strengthen the local economy.
- Encouraging innovation in sustainable practices and supporting initiatives that contribute to environmental conservation and protection.
- Reducing non-essential business travel and replacing physical events with virtual formats whenever feasible.

2.3.2 Social Responsibility

Our brand representation is guided by a strong sense of social responsibility, ensuring that we positively impact the communities in which we operate. Our commitments include:

- Actively engaging with local communities, supporting initiatives that promote social well-being and economic development.
- Fostering a diverse and inclusive environment, ensuring equal opportunities for all individuals regardless of their background.
- Adhering to the highest ethical standards in all our business dealings, promoting transparency, integrity, and accountability.

2.3.3 Governance Standards

Strong governance is essential to maintaining trust and credibility in our brand. Our governance commitments include:

- Complying with all relevant laws and regulations, ensuring that our business practices are transparent and accountable.
- Engaging with our stakeholders, including employees, customers, and investors, to ensure that their interests are considered in our decision-making processes.
- Proactively identifying and managing risks to ensure the long-term sustainability and success of our business.

2.4 Respecting Customer Privacy

This Policy applies to all Emaar's websites, applications, and programmes, including U By Emaar. Emaar is committed to protecting the privacy of our customers and handling customer data responsibly.

We collect and manage personal information in accordance with the UAE Data Protection Law. We endeavour that all personal data is secured against unauthorised access, accidental loss, or damage.

We do not knowingly target or market to minors. Customer information is only shared with third parties upon signing Emaar's DPA form

The Corporate Brand Growth Department and Group ESG Department ensure that all communications and personal data handling practices are aligned with responsible and sustainable principles, maintaining customer trust and compliance with applicable regulations.

3. Training & Awareness

Emaar is committed to ensuring that all employees understand and comply with this Policy.

- All employees, interns, and representatives must complete the mandatory training on responsible brand representation, advertising, and sales practices.
- Training will be provided using appropriate learning methods, with evaluations to ensure comprehension.
- Completion of training will be electronically recorded and tracked by the relevant Human Resources Department to ensure full coverage across the organisation.
- Training will be updated whenever there are changes in regulations, ESG standards, or Emaar's internal policies.
- Training content will include the scope and depth of consumer rights, as well as ethical standards in brand growth and advertising.

4. Policy Governance

All rights and ownership of this Policy are reserved for Emaar's Corporate Brand Growth Department. The brand growth and marketing teams across the integrated business units and operational entities of Emaar are responsible for implementing this Policy.

The Internal Audit team is responsible for conducting systematic and regular audits of compliance with this Policy. These audits assess both the effectiveness of the employees' training programmes and the application of responsible brand growth and communication practices across the Group.

The relevant Human Resources Department is responsible for maintaining centralised records of employee training completion and ensuring evidence of compliance is available for reporting. Training completion will also be referenced in annual disclosures where relevant

The ESG Department provides advisory oversight in relation to this Policy.

Any deviation from this Policy must be justified, reported to and formally approved by the Group CEO and Executive Director. This Policy will be reviewed and updated at least once every three years, or earlier in the event there are any changes in the UAE applicable laws and regulations or Emaar's internal requirements.