

CODE OF CONDUCT

Ni-Met Inc is a state-of-the-art recycling facility located in Al Ghail Industrial Free Zone, Ras Al Khaimah. Established in 2020, it specializes in processing stainless steel and non-ferrous metal scrap. As part of Ni-Met Inc., a global trading company with over 45 years of expertise, the facility supports sustainable practices and contributes to the UAE's circular economy. Operating across a 29,900 sq.m site, NI-MET serves end-users in Asia and Europe. The company holds ISO certifications and actively aligns with the UAE's Net Zero 2050 strategy, with plans underway to expand operations by adding a stainless-steel melt shop.

PURPOSE

The purpose of the **NI-MET** Code of Conduct is to establish clear ethical guidelines and standards for all employees and stakeholders. It promotes integrity, accountability, and compliance with laws and regulations. The document ensures responsible business practices aligned with the company's sustainability and corporate values.

SCOPE

This Code of Conduct applies to all employees, management, contractors, and stakeholders of **Ni-Met Inc**. It outlines the ethical standards, professional behavior, and compliance obligations expected across all levels of the organization. The scope includes workplace conduct, environmental responsibility, health and safety, anti-corruption measures, data confidentiality, and adherence to local and international laws. It ensures that all actions taken by or on behalf of NI-MET align with the company's values of integrity, sustainability, and accountability.

CORE VALUES

- ❖ **Integrity**
We uphold honesty, transparency, and ethical behaviour in all business dealings and interactions.
- ❖ **Sustainability**
We are committed to environmentally responsible practices that promote recycling, resource conservation, and support the UAE's Net Zero 2050 goals.
- ❖ **Accountability**
We take full responsibility for our actions and decisions, ensuring alignment with our mission and values.
- ❖ **Respect**
We foster a diverse, inclusive, and respectful work environment where all individuals are treated with dignity.

❖ **Innovation & Excellence**

We strive for continuous improvement and operational excellence through innovation and best practices.

PRINCIPLES

❖ **Health & Safety**

We prioritize the safety and well-being of our employees, contractors, and visitors by maintaining high safety standards and proactive risk management.

❖ **Compliance**

We strictly follow all applicable local and international laws, environmental regulations, and internal company policies.

❖ **Confidentiality**

We protect sensitive and proprietary information, maintaining the trust of our clients, partners, and stakeholders.

ETHICAL BUSINESS PRACTICES

❖ **Fair & Honest Dealings**

NI-MET conducts all business with integrity, ensuring transparency, fairness, and honesty in transactions with clients, suppliers, employees, and stakeholders.

❖ **Anti-Corruption & Compliance**

The company maintains a strict zero-tolerance policy towards bribery, fraud, and corruption, fully complying with local and international laws and promoting ethical decision-making at all levels.

CONFIDENTIALITY AND DATA PROTECTION

- ❖ Protects all sensitive business information, including employee records, client data, and trade secrets.
- ❖ Grants access to confidential data strictly to authorized personnel only.
- ❖ Requires all employees to handle information responsibly and in compliance with data protection laws.
- ❖ Prohibits unauthorized disclosure, misuse, or breach of data, with violations subject to disciplinary action.
- ❖ Ensures digital systems are secured to prevent data loss, breaches, or cyber threats.
- ❖ Aligns data protection practices with international information security standards.

RESPONSIBLE USE OF COMPANY RESOURCES

NI-MET ensures all company assets are used efficiently, ethically, and solely for authorized business purposes.

Use of Vehicles, Machinery, and Tools

- ❖ Vehicles, machinery, and tools are operated by trained personnel, maintained regularly, and handled with care to ensure safety and longevity.

Resource Conservation and Efficiency

- ❖ NI-MET actively promotes energy, water, and material conservation through optimized processes and a commitment to sustainable operations.

CONFLICT OF INTEREST

Employees must avoid situations where personal interests conflict with the interests of NI-MET Inc. All potential conflicts must be disclosed to management to ensure transparency and ethical decision-making.

CARE OF EQUIPMENT

- ❖ NI-MET ensures all equipment is used strictly for its intended purpose and in line with safety protocols.
- ❖ The company conducts routine inspections and immediately addresses any faults or damages.
- ❖ All machinery and tools are handled with care to maintain operational integrity and safety.
- ❖ Equipment is cleaned and stored properly after every use to ensure longevity.
- ❖ Only trained and authorized personnel operate or service company equipment.

HEALTH, SAFETY, AND ENVIRONMENT (HSE)

- ❖ **Safe Work Environment**
NI-MET is committed to maintaining a safe and healthy workplace by following strict safety protocols and regularly assessing risks.
- ❖ **Employee Responsibility:**
All employees must adhere to HSE guidelines, report unsafe conditions, and actively participate in training and awareness programs.
- ❖ **Environmental Stewardship:**
The company promotes sustainable practices by minimizing environmental impact through waste reduction, recycling, and responsible resource management.
- ❖ **Compliance with Regulations:**
NI-MET complies with all local and international health, safety, and environmental laws and standards.
- ❖ **Continuous Improvement:**
We strive for ongoing improvement in HSE performance through regular audits, feedback, and the adoption of best industry practices.

DIVERSITY, EQUITY & INCLUSION

- ❖ **Diversity:**
NI-MET values and respects the differences in backgrounds, experiences, and perspectives of all employees, fostering a multicultural and inclusive workforce.
- ❖ **Equity:**
We ensure fair treatment, access, and opportunities for all individuals, actively working to eliminate barriers that may hinder employee growth and success.

- ❖ **Inclusion:**
NI-MET is dedicated to creating a work environment where every employee feels welcomed, heard, and empowered to contribute fully to the organization.

SUSTAINABILITY FOCUS

- ❖ **Resource Efficiency:**
NI-MET prioritizes the efficient use of resources by promoting recycling and minimizing waste in all operations.
- ❖ **Environmental Impact Reduction:**
We actively implement practices that reduce our carbon footprint and support a cleaner, greener future.
- ❖ **Support for Circular Economy:**
By converting scrap into reusable materials, NI-MET contributes to the circular economy and aligns with the UAE's sustainability goals.
- ❖ **Consequences for Non-Compliance:**
Violations of the Code may result in disciplinary action, including termination or legal consequences, depending on the severity of the breach.

TRANSPARENCY ASSURANCE

- ❖ **Open Communication:**
NI-MET encourages open and honest communication, allowing employees to raise concerns without fear of retaliation.
- ❖ **Confidential Reporting Channels:**
Secure and confidential systems are in place for reporting unethical behaviour or violations of company policy.
- ❖ **Non-Retaliation Policy:**
Individuals who report misconduct in good faith are protected from retaliation, ensuring a safe environment for speaking up.
- ❖ **Fair Investigation Process:**
All reports are investigated thoroughly, impartially, and with respect for the privacy of those involved.
- ❖ **Commitment to Accountability:**
NI-MET holds all employees accountable for ethical behaviour and ensures transparency in handling reported issues.

IMPLEMENTATION & ENFORCEMENT

- ❖ **Responsibility for Compliance:**
All employees and stakeholders are responsible for understanding and adhering to the Code of Conduct.
- ❖ **Training and Awareness:**
NI-MET provides regular training and communication to ensure everyone is aware of the company's ethical standards and expectations.

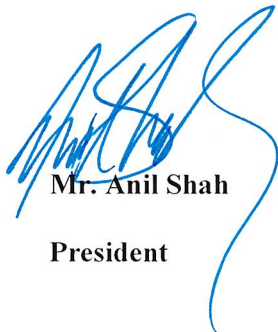
- ❖ **Monitoring and Auditing:**
Compliance with the Code is monitored through internal reviews and audits to ensure consistent enforcement.
- ❖ **Reporting Violations:**
Employees are encouraged to report any breaches or concerns confidentially without fear of retaliation.

REVIEW

- ❖ **Periodic Review:**
NI-MET regularly reviews its Code of Conduct to ensure it reflects current regulations, industry standards, and the company's operational values.
- ❖ **Continuous Improvement:**
The document is updated as needed to adapt to changes in laws, business practices, and sustainability goals.
- ❖ **Employee Communication:**
All staff are promptly informed of any significant updates to ensure continued awareness and compliance.

UPDATES TO THE CODE

- ❖ **Timely Revisions:**
NI-MET ensures the Code of Conduct is updated promptly to reflect legal, regulatory, or operational changes.
- ❖ **Management Oversight:**
All updates are reviewed and approved by the management to maintain consistency with the company's mission and values.
- ❖ **Employee Notification:**
Employees are clearly informed about any changes through official communication channels such as meetings, emails, or training sessions.
- ❖ **Accessible Documentation:**
The most recent version of the Code is always made available to employees for easy reference and compliance.



Mr. Anil Shah
President

