

INFINITY
DEVELOPMENTS

DUBAI · ZANZIBAR

GOVERNANCE & BUSINESS ETHICS

CODE OF ETHICS

CORPORATE GOVERNANCE & COMPLIANCE POLICY

DOCUMENT NO.
ID/ETH/POL-01

VERSION
1.0

EFFECTIVE DATE
18 July 2026

OWNING DEPARTMENT
People & Culture / Legal & Compliance

APPROVED BY
Board of Directors

CLASSIFICATION
Internal — Controlled Document

INFINITY DEVELOPMENTS L.L.C.

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1. Introduction

Infinity Developments L.L.C. builds landmark residential and hospitality destinations across Dubai and Zanzibar. The trust of our residents, guests, partners, employees and the communities in which we build depends on our reputation for integrity. This Code of Ethics (the “Code”) sets out the standards of conduct expected of everyone who works for, or on behalf of, Infinity Developments, and forms the foundation on which our other governance policies — including the Anti-Bribery & Anti-Corruption Policy, Procurement Policy, Whistleblower Policy, Sustainability Policy and Risk Management Framework — are built.

2. Objective

- Set out the core values and standards of behaviour expected of all directors, employees and Business Partners.
- Provide practical guidance for identifying and resolving ethical dilemmas, including conflicts of interest.
- Reinforce the Company’s commitment to legal compliance, fair dealing and respect for people.
- Explain how breaches of the Code should be reported and how they will be addressed.

3. Scope

The Code applies to all directors, officers and employees of Infinity Developments and its subsidiaries and joint ventures, in every location in which the Company operates. Contractors, consultants, agents and other Business Partners are expected to observe standards consistent with this Code when acting for or on behalf of the Company, and this expectation is reflected in relevant contractual terms.

4. Our Core Values

Role	Responsibility
Integrity	We act honestly and consistently, and we do what we say we will do, even when no one is watching.
Respect	We treat colleagues, partners, guests, residents and communities with dignity, fairness and courtesy.
Excellence	We hold ourselves to the highest standards of quality and craftsmanship in everything we build and deliver.
Accountability	We take ownership of our decisions and their consequences, and we correct mistakes openly.

5. Standards of Conduct

5.1 Compliance with Law

All personnel must comply with the laws and regulations of the United Arab Emirates, the United Republic of Tanzania, and any other jurisdiction in which the Company operates, as well as with internal Company policies. Ignorance of the law is not a defence; anyone unsure of a legal requirement should seek guidance from Legal & Compliance.

5.2 Honest and Fair Dealing

Employees must deal honestly and fairly with customers, suppliers, competitors and co leagues. No one should take unfair advantage of another through manipulation, concealment, misrepresentation of material facts, or other unfair practice.

5.3 Conflicts of Interest

A conflict of interest arises when personal interests — financial, familial or otherwise — could improperly influence, or appear to influence, an individual's business judgment. Employees must disclose actual or potential conflicts to their manager and Legal & Compliance, including: outside employment or directorships; financial interests in suppliers, contractors or competitors; and hiring or supervising relatives or close personal associates.

5.4 Gifts, Hospitality and Entertainment

Employees may give or receive only modest, reasonable and transparent gifts or hospitality connected to legitimate business purposes, in line with the limits set out in the Anti-Bribery & Anti-Corruption Policy. Cash or cash-equivalent gifts must never be given or accepted.

5.5 Protection and Proper Use of Company Assets

Company assets - including funds, property, equipment, information systems and confidential information - must be used responsibly and only for legitimate business purposes, and protected from loss, damage, theft or misuse.

5.6 Confidentiality and Data Protection

Employees must protect confidential business information and personal data belonging to the Company, its employees, residents, guests and business partners, and must not disclose such information except as authorised or required by law, both during and after their employment.

5.7 Fair Employment, Respect and Non-Discrimination

Infinity Developments is committed to a workplace free from harassment, discrimination and bullying, and to fair treatment in recruitment, development, compensation and promotion decisions, based on merit and free from bias related to nationality, gender, religion, age, disability or any other protected characteristic under applicable law.

5.8 Health, Safety and Environment

Every individual is responsible for working safely, following site safety procedures, and reporting hazards or incidents promptly, in line with the Company's health, safety and environmental standards and its Sustainability Policy.

5.9 Accurate Books and Records

All business records, financial and non-financial, must accurately and completely reflect the underlying transactions. No employee may create false, misleading or incomplete records, or assist another person in doing so.

5.10 Fair Competition

The Company competes vigorously but fairly, and does not engage in bid-rigging, price-fixing, market allocation or other anti-competitive conduct.

5.11 External Communications

Only authorised spokespeople may communicate on the Company's behalf with media, investors or regulators. Employees should exercise care when discussing Company business on socialmedia and must not disclose confidential or commercially sensitive information.

6. Raising Concerns and Reporting Breaches

Employees who witness or suspect a breach of this Code should raise it with their manager, People & Culture, or Legal & Compliance, or report it confidentially or anonymously through the channels set out in the Whistleblower Policy:

Channel	Detail
Email	info@infinitydevelopments.ae
Phone	+971 4 578 8088 (Toll-Free within the UAE: 800-80008)

The Company will not tolerate retaliation against anyone who raises a concern in good faith, consistent with the protections set out in the Whistleblower Policy.

7. Disciplinary Action

Breaches of this Code are treated seriously and may result in disciplinary action up to and including termination of employment or contract, and, where the conduct is unlawful, referral to the relevant authorities. Managers who fail to address known breaches within their teams may themselves be subject to disciplinary action.

8. Roles and Responsibilities

Role	Responsibility
Board of Directors	Sets the tone from the top and models the standards expected throughout the organisation.
Senior Management	Leads by example, embeds the Code within their teams and ensures concerns are addressed promptly.
People & Culture	Owns the Code, delivers induction and refresher training, and manages disciplinary processes.
Legal & Compliance	Provides guidance on the Code, manages conflict-of-interest declarations and supports investigations.
All Employees and Business Partners	Read, understand and comply with the Code, complete required training, and report concerns promptly.

9. Training and Acknowledgement

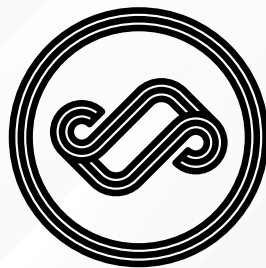
All employees receive training on this Code at induction and periodically thereafter, and are required to acknowledge in writing that they have read, understood and agree to comply with it. People & Culture maintains records of training completion and acknowledgement.

10. Ownership, Administration and Review

Field	Detail
Policy Owner	People & Culture, jointly with Legal & Compliance
Review Cycle	At least every two years, or sooner if required by regulatory change
Approving Authority	Board of Directors
Related Policies	Anti-Bribery & Anti-Corruption Policy, Whistleblower Policy, Procurement Policy, Sustainability Policy

11. Glossary

Term	Definition
Business Partner	Any consultant, contractor, agent, supplier or joint-venture partner acting for or on behalf of the Company.
Conflict of Interest	A situation in which personal interests could improperly influence, or appear to influence, professional judgment.
Confidential Information	Non-public business, financial, technical or personal information belonging to the Company or a third party.
Disciplinary Action	Formal action taken in response to a substantiated breach of this Code, up to and including termination.
Retaliation	Any adverse action taken against a person because they raised a concern in good faith.



INFINITY

DEVELOPMENTS

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