



ADAMALLYS LLC

INCLUSION, DIVERSITY AND EQUAL OPPORTUNITY POLICY

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1. PURPOSE

Adamallys LLC is committed to maintaining a workplace that promotes equality, respects individual differences and provides fair opportunities for all employees.

The Company recognises that a diverse workforce contributes to its operational effectiveness, service quality, decision-making and long-term business success. As an organisation operating within the United Arab Emirates and serving an international maritime industry, Adamallys LLC values the experience, skills and perspectives of employees from different nationalities, cultures and professional backgrounds.

This policy establishes the Company's standards for inclusion, diversity, equal employment opportunity, equitable remuneration and the prevention of discrimination and harassment. It also defines the measures through which these standards will be implemented, monitored and maintained.

2. SCOPE

This policy applies to all employees of Adamallys LLC, including permanent, temporary, part-time and fixed-term employees, irrespective of their position, seniority, employment category or work location.



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It applies to all departments and business functions, including management, administration, procurement, sales, warehousing, logistics, transportation and other operational activities.

The principles of this policy also extend, where applicable, to job applicants, interns, contractors, agency personnel, consultants and other individuals engaged in activities on behalf of the Company.

All managers and supervisors are responsible for ensuring that the requirements of this policy are observed within their respective departments.

3. POLICY PRINCIPLES

Adamallys LLC is committed to the following principles:

3.1. Providing equal employment opportunities based on qualifications, competence, experience, performance and the requirements of the position.

3.2. Maintaining a workplace free from unlawful discrimination, harassment, bullying, intimidation and unfair treatment.

3.3. Ensuring that remuneration, benefits, training, promotion and career development decisions are based on objective and justifiable criteria.

3.4. Recognising and respecting differences in nationality, ethnicity, race, colour, gender, age, religion, disability, cultural background and other personal characteristics.

3.5. Supporting employees in contributing effectively to the organisation, irrespective of their background or personal circumstances.

3.6. Encouraging fair representation and access to opportunities across all levels and departments of the Company.

3.7. Promoting professional conduct, mutual respect and cooperation among employees.

3.8. Complying with applicable UAE labour legislation and other relevant regulatory requirements.





4. EQUAL EMPLOYMENT OPPORTUNITY

Adamallys LLC shall maintain fair and consistent employment practices throughout the employee lifecycle.

Decisions concerning recruitment, selection, remuneration, training, promotion, transfer, performance assessment, disciplinary action and termination shall be based on legitimate business requirements and objective employment-related criteria.

The Company prohibits unlawful discrimination on grounds protected under applicable UAE legislation. It also seeks to prevent unjustified differential treatment based on other personal characteristics unrelated to an individual's ability to perform the responsibilities of a position.

Any employment-related requirements or restrictions must be reasonable, relevant to the duties of the position and consistent with applicable law.

Measures required or permitted under UAE legislation, including national workforce participation and Emiratisation requirements, shall be implemented in accordance with the relevant regulations.

5. RECRUITMENT, SELECTION AND PROMOTION

The Company shall endeavour to maintain recruitment and career progression procedures that provide fair access to employment opportunities.

The following requirements shall apply:

5.1. Job descriptions shall identify the principal duties, qualifications, experience and competencies required for each position.

5.2. Recruitment and selection decisions shall be based on suitability for the position, relevant skills, professional qualifications and demonstrated competence.

5.3. Job advertisements and recruitment communications shall use professional and inclusive language and avoid unnecessary restrictions unrelated to genuine occupational requirements.





5.4. Interview assessments and selection decisions shall, where practicable, follow consistent criteria for candidates applying for comparable positions.

5.5. Internal promotion and advancement decisions shall take account of performance, capability, experience, qualifications and organisational requirements.

5.6. Employees shall have fair access to relevant vacancies, development opportunities and consideration for advancement, subject to operational needs.

5.7. Recruitment and promotion practices shall be periodically reviewed to identify potential barriers to equal opportunity.

The Company shall retain appropriate records supporting recruitment and promotion decisions in accordance with its record-retention procedures and applicable data protection requirements.

6. EQUAL PAY AND FAIR REMUNERATION

Adamallys LLC is committed to maintaining remuneration practices that are fair, consistent, transparent in their underlying principles and compliant with applicable UAE legislation.

The Company recognises the principle of equal remuneration for employees performing the same work or work of equal value, with particular regard to the legal requirement for equal pay between men and women.

Remuneration decisions shall be determined by appropriate factors, which may include:

- The nature and responsibilities of the position.
- Relevant qualifications, skills and professional experience.
- Job complexity, accountability and supervisory responsibilities.
- Individual performance and demonstrated competence.
- Prevailing market conditions and recruitment requirements.
- Applicable employment contracts, statutory entitlements and approved Company remuneration structures.

Differences in remuneration must be supported by legitimate and documented considerations and must not arise from unlawful discrimination.





Where appropriate, the Company shall review salary structures, allowances, bonuses and other remuneration components to assess consistency across comparable positions.

Any unjustified remuneration disparities identified through these reviews shall be investigated and addressed through an appropriate corrective action process.

7. GENDER PAY GAP ANALYSIS AND REMUNERATION EQUITY REVIEW

Adamallys LLC shall undertake an annual internal review of remuneration practices to assess pay equity, identify potential disparities and support fair employment outcomes.

7.1. Annual Pay Gap Assessment

The annual assessment shall be coordinated by the designated Human Resources or administrative function, in consultation with General Management and the relevant finance personnel.

Subject to the availability and reliability of employment data, the assessment shall consider:

- a. Average remuneration of male and female employees across the organisation.
- b. Median remuneration of male and female employees.
- c. Remuneration differences between male and female employees within comparable job categories, grades or positions.
- d. Differences in basic salary, fixed allowances and variable remuneration, where applicable.
- e. Representation of male and female employees across departments, occupational categories and management levels.
- f. Distribution of salary increments, promotions and performance-related remuneration.
- g. Any material disparities identified between employees performing the same work or work of equal value.





7.2. Methodology

For the purposes of the annual assessment:

- The **mean gender pay gap** shall measure the percentage difference between the average remuneration of male and female employees, using male average remuneration as the reference.
- The **median gender pay gap** shall measure the percentage difference between the median remuneration of male and female employees, using male median remuneration as the reference.
- Where bonuses or other variable payments are applicable, these shall be reviewed separately to avoid distortion of basic salary comparisons.
- Where appropriate, remuneration figures shall be adjusted to a comparable full-time basis to account for differences in working arrangements.
- Comparative assessments shall take account of job responsibilities, seniority, experience, qualifications and other legitimate remuneration factors.

The Company recognises that an overall gender pay gap does not, by itself, establish unequal pay for equivalent work. Differences in occupational distribution, seniority, experience and representation across departments may influence the results. Accordingly, identified gaps shall be examined in their proper operational and employment context.

7.3. Identification and Correction of Disparities

Where a material or unexplained pay disparity is identified, the Company shall:

- a. Review the relevant employment and remuneration records.
- b. Determine whether the difference is attributable to objective and justifiable factors.
- c. Assess whether the disparity indicates unequal treatment or inconsistency in remuneration practices.
- d. Establish corrective measures where an unjustified disparity is confirmed.
- e. Document the findings, decisions and actions undertaken.





f. Monitor the effectiveness of corrective measures through subsequent remuneration reviews.

Corrective actions may include salary adjustments, revisions to remuneration structures, amendments to recruitment salary practices or improvements to performance and promotion assessment procedures.

Any correction required to satisfy applicable legal obligations shall be addressed without unnecessary delay.

7.4. Reporting and Oversight

A summary of the annual pay equity assessment shall be submitted to General Management for review.

The report shall identify material findings, areas requiring attention and any recommended corrective actions.

Individual remuneration information shall remain confidential and accessible only to authorised personnel with a legitimate business requirement.

Where workforce numbers within a particular category are insufficient to permit meaningful statistical comparison, the Company may undertake a confidential individual remuneration assessment instead.

8. TRAINING AND PROFESSIONAL DEVELOPMENT

Adamallys LLC recognises that fair access to training and professional development is essential to maintaining an inclusive and capable workforce.

The Company shall:

8.1. Provide employees with access to relevant training based on their responsibilities, operational requirements and professional development needs.

8.2. Ensure that nominations for training and development opportunities are based on appropriate and consistent criteria.





8.3. Encourage the development of employees with demonstrated capability and potential for additional responsibilities.

8.4. Provide managers and supervisors with guidance on fair employment practices, professional workplace conduct and the prevention of discrimination.

8.5. Consider language, accessibility and other reasonable requirements when delivering employee training or workplace communications.

8.6. Review participation in relevant training and professional development programmes to identify any significant or unexplained disparities in access.

9. INCLUSIVE WORKPLACE PRACTICES

The Company is committed to maintaining a professional working environment in which all employees are treated with dignity and respect.

Employees and managers are expected to demonstrate appropriate conduct in their interactions with colleagues, customers, suppliers, contractors and other business associates.

Adamallys LLC shall seek to support inclusion through the following practices:

9.1. Promoting respectful communication across different cultural, linguistic and professional backgrounds.

9.2. Ensuring that workplace rules, responsibilities and expectations are communicated clearly.

9.3. Supporting cooperation between employees across departments and levels of seniority.

9.4. Considering reasonable workplace adjustments for employees with disabilities or relevant individual needs, taking account of applicable legislation, the requirements of the role, operational feasibility and workplace safety.

9.5. Respecting employees' religious and cultural practices in accordance with applicable laws, workplace requirements and reasonable operational considerations.





9.6. Providing fair access to workplace facilities, resources and employment-related benefits in accordance with Company policies.

9.7. Encouraging employees to express work-related concerns, suggestions and feedback without fear of unfair treatment.

9.8. Taking reasonable steps to ensure that relevant employment communications are understood by the employees concerned.

All workplace adjustments must remain consistent with the Company's health, safety and operational requirements.

10. PREVENTION OF DISCRIMINATION, HARASSMENT AND BULLYING

Adamallys LLC does not tolerate discrimination, sexual harassment, bullying, intimidation or other forms of abusive workplace conduct.

Prohibited conduct includes, but is not limited to:

- Offensive or derogatory remarks concerning an individual's personal background or characteristics.
- Unwelcome conduct of a sexual nature.
- Threatening, humiliating or intimidating behaviour.
- Repeated verbal abuse or deliberate mistreatment.
- Unjustified exclusion from employment opportunities on discriminatory grounds.
- Misuse of managerial authority to intimidate, harass or unfairly disadvantage employees.
- Retaliation against employees who raise concerns or participate in an investigation in good faith.

These standards apply during working hours, on Company premises, at operational locations, during business travel and at work-related meetings or events.

All reported incidents shall be considered seriously and addressed in accordance with applicable Company procedures and UAE legislation.

11. COMPLAINTS, INVESTIGATION AND NON-RETALIATION



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Employees who believe that they have experienced or witnessed discrimination, harassment, unequal treatment or other conduct contrary to this policy are encouraged to report their concerns.

11.1. Reporting Channels

Concerns may be raised with:

- a. The employee's immediate supervisor or department manager.
- b. The designated Human Resources or administrative representative.
- c. General Management, particularly where the complaint concerns a direct supervisor or departmental manager.

Where a complaint concerns an individual normally responsible for receiving or investigating such reports, the matter shall be referred to an appropriate alternative member of management with no direct conflict of interest.

11.2. Investigation Procedure

All complaints shall be handled fairly, objectively and with appropriate confidentiality.

The Company shall:

- a. Acknowledge and assess complaints within a reasonable period.
- b. Determine the appropriate investigation process based on the nature and seriousness of the matter.
- c. Provide the parties concerned with a reasonable opportunity to present relevant information.
- d. Review available evidence and maintain appropriate records.
- e. Take proportionate corrective or disciplinary action where a breach is established.
- f. Communicate the outcome to the parties concerned to the extent appropriate and legally permissible.





Where necessary, reasonable interim measures may be introduced to protect the individuals involved and maintain an appropriate working environment during an investigation.

11.3. Protection Against Retaliation

Retaliation against an employee for reporting a concern in good faith, providing information or participating in an investigation is prohibited.

The Company shall not permit employees to be subjected to threats, intimidation, unjustified disciplinary measures or other adverse treatment because they have raised a legitimate concern.

Deliberately false or malicious allegations may themselves constitute misconduct. A complaint made in good faith shall not be treated as misconduct merely because it cannot be substantiated.

Employees retain their rights to pursue applicable external complaint and legal remedies under UAE law.

12. EMPLOYEE ENGAGEMENT AND FEEDBACK

Adamallys LLC recognises the importance of employee feedback in identifying workplace concerns and improving employment practices.

The Company shall provide reasonable opportunities for employees to communicate concerns and recommendations relating to equal opportunity, workplace conduct and inclusion.

Such feedback may be obtained through employee discussions, departmental meetings, confidential feedback channels or periodic employee surveys.

Where practicable, employee feedback shall be reviewed to identify recurring concerns, barriers to participation and opportunities for improvement.

Actions arising from material findings shall be documented and referred to the appropriate department or management representative for consideration.

13. MONITORING, PERFORMANCE MEASUREMENT AND REPORTING



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The implementation and effectiveness of this policy shall be assessed at least annually.

The review shall consider relevant qualitative and quantitative information, subject to data availability and applicable privacy requirements.

13.1. Key Monitoring Indicators

The following indicators shall be considered, where applicable:

Area	Monitoring Indicator	Review Frequency
Workforce diversity	Workforce composition by gender, nationality and job category	Annual
Recruitment	Recruitment and selection outcomes across relevant employee groups	Annual
Pay equity	Mean and median gender pay gaps and comparable-role pay assessments	Annual
Remuneration	Distribution of salary increases, allowances and bonuses	Annual
Career progression	Promotions and advancement opportunities	Annual
Training	Participation in training and professional development	Annual
Employee relations	Discrimination, harassment and related complaints	Annual
Corrective measures	Progress and closure of identified improvement actions	Annual
Policy awareness	Communication and acknowledgement of relevant policy requirements	Annual

13.2. Assessment and Improvement

Management shall evaluate the findings to determine whether existing policies and employment practices remain appropriate and effective.

Where material issues or recurring disparities are identified, the responsible department shall propose suitable corrective measures.





The review shall consider the scale and nature of the Company's operations, workforce composition and legitimate business requirements.

The objective of monitoring is to promote fair treatment and continual improvement, rather than impose numerical representation targets that may be inappropriate for particular occupational categories.

14. DATA PROTECTION AND CONFIDENTIALITY

All employee information collected or processed for the implementation of this policy shall be handled in accordance with applicable UAE data protection legislation and Company confidentiality requirements.

Personal information used for workforce diversity monitoring, remuneration analysis or internal investigations shall be limited to information necessary for a legitimate and lawful purpose.

The Company shall:

14.1. Restrict access to personal and remuneration records to appropriately authorised personnel.

14.2. Maintain reasonable administrative and technical safeguards to protect confidential employee information.

14.3. Use aggregated or anonymised information for management reporting wherever practicable.

14.4. Avoid unnecessary disclosure of information concerning an employee's personal characteristics, remuneration or individual circumstances.

14.5. Retain relevant records only for applicable legal, operational or legitimate business purposes.

14.6. Ensure that the collection and processing of sensitive employee information is undertaken only where legally permissible and appropriately justified.

Employee participation in surveys concerning personal characteristics shall be voluntary where such disclosure is not otherwise required or authorised by law.





15. ROLES AND RESPONSIBILITIES

15.1. General Management

General Management shall have overall responsibility for the implementation and oversight of this policy.

Responsibilities include:

- a. Ensuring that inclusion, diversity and equal opportunity principles are reflected in relevant management decisions.
- b. Reviewing significant findings from annual monitoring and remuneration equity assessments.
- c. Approving appropriate corrective measures and improvements.
- d. Ensuring that serious complaints are addressed fairly and in accordance with Company procedures.
- e. Providing reasonable resources for the effective implementation of this policy.

15.2. Human Resources / Administration

The designated Human Resources or administrative function shall be responsible for:

- a. Communicating the policy to employees.
- b. Supporting consistent recruitment, employment and remuneration procedures.
- c. Coordinating annual diversity monitoring and pay equity reviews.
- d. Maintaining appropriate records and documentation.
- e. Supporting employee training, feedback and complaint procedures.
- f. Reporting significant findings and recommended improvements to General Management.





15.3. Department Managers and Supervisors

Department managers and supervisors shall:

- a. Apply employment-related decisions fairly and consistently.
- b. Promote professional and respectful workplace behaviour.
- c. Ensure employees have appropriate access to relevant training and development.
- d. Address concerns promptly and refer significant matters through the appropriate reporting channels.
- e. Cooperate with monitoring activities, investigations and corrective measures.

15.4. Employees

All employees are expected to:

- a. Treat colleagues and other individuals with dignity and respect.
- b. Comply with the standards established under this policy.
- c. Refrain from discriminatory, harassing or otherwise inappropriate behaviour.
- d. Report serious concerns through the available reporting channels.
- e. Cooperate appropriately with investigations and related corrective measures.

16. COMPLIANCE AND CORRECTIVE ACTION

Compliance with this policy is a responsibility shared by management and employees.

Any confirmed violation may result in appropriate corrective or disciplinary action, taking account of the seriousness of the breach, the circumstances involved and applicable UAE labour legislation.

Corrective actions may include additional training, management intervention, changes to employment practices, formal disciplinary measures or other appropriate steps.





Where a systemic issue is identified, the Company shall consider changes to the relevant policy, process or control to reduce the likelihood of recurrence.

Nothing in this policy shall limit any statutory rights or obligations under applicable UAE law.

17. LEGAL AND REGULATORY FRAMEWORK

This policy shall be implemented in accordance with applicable legislation in the United Arab Emirates, including:

- Federal Decree-Law No. 33 of 2021 concerning the Regulation of Labour Relations, as amended.
- Cabinet Resolution No. 1 of 2022 concerning the Implementing Regulation of Federal Decree-Law No. 33 of 2021, as amended.
- Federal Decree-Law No. 34 of 2023 concerning Combating Discrimination, Hatred and Extremism, as applicable.
- Federal Decree-Law No. 45 of 2021 concerning the Protection of Personal Data, as applicable.
- Other relevant UAE employment, occupational health and safety, and regulatory requirements.

Where any provision of this policy conflicts with a mandatory legal requirement, the applicable legislation shall prevail.

18. POLICY COMMUNICATION AND IMPLEMENTATION

This policy shall be communicated to relevant employees and made accessible through appropriate Company communication channels.

Managers and supervisors shall be responsible for ensuring that employees under their supervision are informed of its requirements.

New employees shall be made aware of the Company's expectations regarding equality, respectful workplace conduct and the reporting of concerns as part of their induction or onboarding process.

Implementation of this policy shall be supported through relevant internal procedures, management oversight, appropriate recordkeeping and periodic review.





19. POLICY REVIEW AND AMENDMENT

This policy shall be reviewed at least once every twelve months, or earlier where required by legislative changes, organisational developments, audit findings or material changes to the Company's employment practices.

The review shall consider:

- a. Changes in relevant legal and regulatory requirements.
- b. Findings from annual workforce diversity and pay equity assessments.
- c. Employee feedback and significant workplace concerns.
- d. Outcomes of investigations and corrective actions.
- e. The continuing suitability and effectiveness of the policy.

Any material amendments shall be submitted to General Management for approval and communicated to relevant employees.

20. APPROVAL AND AUTHORISATION

This Inclusion, Diversity and Equal Opportunity Policy is approved by the undersigned and shall take effect from the date of approval.

All departments and employees of Adamallys LLC are required to comply with its provisions.





For and on behalf of ADAMALLYYS LLC

Name: Azhar Gulamhusein

Designation: GENERAL MANAGER

Signature: 

Date: 01/01/2026

Company Stamp:



END OF POLICY DOCUMENT

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