

ORSERS CONSULTING FZ-LLC  
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**Effective Date:** July 2025  
**Approved by:** Rabie Kaouche, Managing Director

## CODE OF ETHICS AND BUSINESS CONDUCT

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### 1. Purpose and Commitment

At ORSERS Consulting, we are committed to ethical, transparent, and lawful business practices. This Code of Ethics and Business Conduct outlines the principles that govern our work and define how we interact with clients, partners, suppliers, and governments.

### 2. Scope

This Code applies to all ORSERS Consulting employees, officers, contractors, and agents, across all regions in which we operate. It also reflects expectations for suppliers and partners representing our brand.

### 3. Compliance with Laws and Regulations

We comply with all local and international laws, including those related to:

- Anti-corruption
- Competition and antitrust
- Data privacy and protection
- Labor and employment
- Trade compliance

All employees are responsible for understanding the laws applicable to their roles.

### 4. Anti-Corruption and Anti-Bribery

ORSERS Consulting strictly prohibits all forms of bribery, corruption, and improper payments in both public and private sector dealings.

No one at ORSERS may offer, promise, solicit, or accept anything of value to influence business decisions or gain an unfair advantage.

This includes:

- Bribes and kickbacks
- Facilitation payments
- Gifts, hospitality, or donations given with improper intent

We fully comply with the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and applicable anti-corruption laws in the UAE, Africa, and other jurisdictions in which we operate.

Violations must be reported immediately. Retaliation against those who report in good faith is strictly prohibited.

## **5. Fair Competition**

ORSERS engages in fair, honest, and lawful competition. We do not engage in practices such as price-fixing, bid-rigging, market allocation, or other anti-competitive behavior.

## **6. Dealing with Government Entities**

When interacting with government clients, ORSERS applies the highest ethical standards. We respect procurement rules, maintain full transparency, and avoid any activity that may be perceived as influence peddling or conflict of interest.

## **7. Conflicts of Interest**

Employees must avoid situations where personal interests could conflict with ORSERS's interests. Conflicts—real or perceived—must be disclosed and resolved with management oversight.

## **8. Confidentiality and Data Protection**

ORSERS protects all non-public information entrusted to us. We comply with applicable data protection laws, including the EU GDPR and UAE Federal Decree Law No. 45 of 2021, and ensure that client and company information is stored, accessed, and shared responsibly.

## **9. Trade Compliance**

ORSERS complies with all trade laws and export controls, including sanctions, embargoes, and prohibited party screening. Employees must not participate in transactions restricted by applicable regulations.

## **10. Equal Opportunity and Workplace Conduct**

We are committed to a respectful, inclusive, and safe workplace, free of discrimination, harassment, or retaliation. We recruit and operate based on merit and fairness.

## **11. Health, Safety, and Environment**

We uphold high standards for health, safety, and environmental responsibility. Employees must report hazards and follow all internal and legal safety guidelines.

## **12. Reporting and Whistleblower Protection**

All employees are encouraged to report violations of this Code or the law. ORSERS maintains confidential reporting channels and prohibits retaliation against whistleblowers acting in good faith.

## **13. Training and Enforcement**

ORSERS provides regular training on business ethics, compliance, and anti-corruption for relevant teams. Violations of this Code may result in disciplinary action up to and including termination or legal proceedings.

#### **14. Commitment to the UN Global Compact**

ORSERS Consulting has been an active participant of the UN Global Compact since 2013. We uphold and integrate the UNGC's ten principles into our strategies, operations, and culture—particularly those related to anti-corruption, human rights, and fair labor practices.

**Note:**

The anti-corruption clause required by Oracle is found in Section 4 – Anti-Corruption and Anti-Bribery.