

# **CODE OF CONDUCT**

CRUISE MOTOROS FZCO

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# THE PURPOSE OF CRUISE MOTORS CODE OF CONDUCT

Cruise Motors FZCO's values, business approach, and corporate philosophy have been shaped by practical experience in international automotive trade and a deep commitment to integrity, trust, and operational excellence.

Our Code of Conduct serves as a foundation for how we act—with customers, employees, partners, and governments. It reflects our belief that long-term success is built on transparency, professionalism, and ethical responsibility in every transaction.

This Code is guided by our principles of:

- Customer commitment
- Integrity in trade
- Respect for law and compliance
- Accountability and continuous improvement

These principles define how Cruise Motors operates daily across markets, especially in the UAE and Africa, and how we interact with stakeholders from NGOs to private corporations.

At Cruise Motors, we believe in  
**Delivering Trust, Reliability, and Value for All**  
Towards the vision of  
**Empowering Global Automotive Trade with Ethics and Excellence.**

This Code summarizes how we should behave to uphold these ideals—whether in sourcing vehicles, exporting goods, handling compliance, or engaging with clients. It outlines the policies and expectations that apply to everyone representing Cruise Motors, helping us navigate challenges with confidence and professionalism.

# WHEN IN DOUBT ASK YOURSELF ↘

This Code of Conduct applies to all Cruise Motors FZCO team members, directors, representatives, and affiliated business partners. While it covers key principles and expectations, no policy can address every situation you may encounter.

If you face uncertainty, ask yourself the following questions:

1

Are my actions consistent with Cruise Motors' values, policies, and this Code of Conduct?

2

Would I feel proud if my team and management knew what I was about to say or do?

3

If this decision or action was made public, would I still feel comfortable and confident with it?



If the answer is yes to all three questions — you're likely making the right choice.

If the answer is no to any, pause and consult a supervisor or manager before proceeding.

# CRUISE MOTORS PRINCIPLES

- ↳ **Remain faithful to your commitments, contributing to the company's success and the trust of our clients and partners.**
- ↳ **Be proactive, resourceful, and forward-thinking, always seeking better ways to serve the automotive industry.**
- ↳ **Focus on practical, results-driven action, avoiding unnecessary delays or complications.**
- ↳ **Build a professional, respectful, and collaborative workplace, where teamwork and positivity drive performance.**
- ↳ **Maintain humility and gratitude, recognizing that success is shared and grounded in mutual respect and service.**



# CRUISE MOTORS PHILOSOPHY

In building Cruise Motors FZCO, our journey has always been guided by a clear purpose: to empower cross-border automotive trade while upholding the highest standards of ethics, quality, and service. Our philosophy reflects this mission and serves as a strategic compass for our future.

## VALUE

We combine three core strengths—Product Expertise, Global Networks, and Operational Reliability—to create unique value in every vehicle we deliver.

## MISSION

We are committed to helping customers, partners, and communities succeed by providing transparent, timely, and tailored automotive solutions.

## VISION

Our goal is to facilitate global access to high-quality vehicles while building long-term partnerships, supporting local economies, and ensuring compliance with international standards.



# CHAPTER 1

## With Our People

# Workplace Conduct and Respect

We respect one another and work together to maintain a safe, inclusive, and high-performing workplace.



## Our Policy

- ↳ Cruise Motors respects every team member's background and strives to create a culture of trust, dignity, and active engagement.
- ↳ We are committed to maintaining a workplace that is free from discrimination, harassment, and intimidation.
- ↳ We comply fully with UAE labor laws and uphold fair, decent, and lawful working conditions for all employees and contractors.
- ↳ We promote an environment where everyone can contribute and grow based on merit, integrity, and professionalism.

## Our Commitment

- ↳ Act with honesty, respect, and professionalism in all interactions.
- ↳ Value each person's voice and encourage open, inclusive communication.
- ↳ Reject and report any form of harassment, abuse, or unfair treatment.
- ↳ Support diversity as a strength that fosters innovation and understanding.
- ↳ Follow all safety procedures, health regulations, and workplace rules. Report accidents, unsafe behavior, or health risks immediately to management.

# Human Rights

We respect and protect the dignity and rights of every individual.

## Our Policy

- ↳ Cruise Motors is committed to respecting the human rights of our employees, clients, partners, and all individuals affected by our business activities. We promote ethical practices and lawful treatment across all our operations.



## Our Commitment

- ↳ We support and uphold the Universal Declaration of Human Rights and follow internationally accepted frameworks such as the UN Guiding Principles on Business and Human Rights.
- ↳ We comply with applicable UAE labor laws, and international regulations related to:
  1. Fair wages and benefits
  2. Safe working conditions
  3. Freedom from discrimination and harassment
  4. Zero tolerance for child labor, forced labor, or bonded labor
- ↳ We apply due diligence to evaluate and monitor potential business partners, suppliers, and vendors to ensure alignment with our human rights standards.

Our People

Society

Integrity

Fairness

# Data Privacy and Personal Information

We respect the privacy of our customers, employees, and partners and we protect their personal information responsibly.

## Our Policy

- ↘ Cruise Motors complies with all applicable UAE data protection laws and international best practices when handling personal data.
- ↘ We apply Privacy by Design, incorporating privacy considerations early into our operational workflows, communications, and customer management systems.
- ↘ We promote a privacy-aware culture through continuous employee training and strong internal controls.
- ↘ Across departments, we coordinate closely to maintain a secure and efficient personal information management framework.

## Our Commitment

- ↘ Handle personal information with care, integrity, and discretion.
- ↘ Actively listen to privacy-related feedback and concerns from clients and team members.
- ↘ Use customer information only for legitimate business purposes — never for unauthorized marketing or distribution.
- ↘ Ensure that all data collected is:
  1. Processed lawfully
  2. Stored securely
  3. Accessed only by authorized personnel
  4. Deleted when no longer needed



# CHAPTER 2

## With **Society**

# Environment Responsibility

We strive to reduce our environmental footprint and promote sustainability in all aspects of our operations.



## Our Policy

- ↘ Cruise Motors is committed to minimizing the environmental impact of our vehicle export, logistics, and procurement activities.
- ↘ We seek to understand the environmental effects at all stages of our supply chain — from sourcing to shipping.
- ↘ We actively encourage our staff, partners, and suppliers to adopt eco-conscious practices that align with UAE and international standards.
- ↘ We promote awareness and improvement of our environmental performance through responsible resource use, recycling efforts, and emission controls.

## Our Commitment

- ↘ Comply with UAE environmental laws and global environmental frameworks where applicable.
- ↘ Take proactive measures to reduce carbon emissions, minimize waste, and protect natural resources.
- ↘ Work with suppliers who also demonstrate sustainable practices and ethical sourcing.
- ↘ Monitor and manage environmental risks related to transport, logistics, and facility operations.

# Customer and Community Relations

We support the development and well-being of the communities where we operate and do business.

## Our Policy

- ↘ Cruise Motors aims to contribute positively to every community in which we operate, especially in markets across Africa and the Middle East.
- ↘ We support causes aligned with education, health, transport access, and youth development.
- ↘ Our company may assist in disaster recovery, community support, and access to vehicles or services during humanitarian crises.
- ↘ We engage in corporate giving with the purpose of being a responsible and trusted citizen, not to gain commercial advantage.

## Our Commitment

- ↘ Encourage our team to participate in volunteer and outreach initiatives.
- ↘ Ensure that all donations and sponsorships are transparent, legal, and compliant with UAE and international laws.
- ↘ Avoid any charitable contributions intended to influence or secure unfair business advantages.
- ↘ Partner with recognized and vetted NGOs and institutions to ensure impact and accountability.

# Relation with Public Authorities

We maintain transparent and lawful relations with governments and public authorities, and refrain from improper political involvement.

## Our Policy

- ↳ Cruise Motors upholds clear, professional, and transparent relationships with government bodies, public officials, customs authorities, and regulatory agencies across all countries we operate in.
- ↳ We do not engage in political lobbying, favoritism, or informal arrangements for commercial gain.
- ↳ All dealings with public entities are done in strict accordance with UAE law and international trade regulations.
- ↳ We separate our corporate interests from any personal political involvement of employees.

## Our Commitment

- ↳ Treat all administrative and public bodies with respect, honesty, and neutrality.
- ↳ Ensure that any contributions or sponsorships made in connection with public institutions are:
  1. Voluntary and transparent
  2. Not intended to influence policy, decisions, or contracts
  3. Compliant with anti-bribery and anti-corruption policies
- ↳ Train our team to identify and avoid conflicts of interest when interacting with public officials.

# Communication and Public Representation

We keep our stakeholders informed by communicating accurate, respectful, and timely information.

## Our Policy

- ↳ Cruise Motors is committed to building strong and positive relationships through open, honest, and accurate communication.
- ↳ We respect and consider feedback, suggestions, and concerns from clients, partners, and team members.
- ↳ We ensure that all communications — internal or external — are aligned with our values and do not cause harm to individuals or damage the company's integrity or reputation.

## Our Commitment

- ↳ Share information with accuracy, professionalism, and clarity — whether in proposals, emails, or client updates.
- ↳ Only authorized personnel may respond to external inquiries, media requests, or official statements about Cruise Motors.
- ↳ Employees must clearly separate their personal views on social media from Cruise Motors, and maintain respectful conduct at all times.
- ↳ Confidential information — about the company, customers, team members, or partners — must be kept secure and out of public view.



# CHAPTER 3

## With Integrity

# Product Quality and Customer Trust

We are committed to delivering only safe, reliable, and high-quality vehicles and automotive solutions.



## Our Policy

- ↘ Cruise Motors prioritizes product safety and customer satisfaction in every sale and shipment.
- ↘ We ensure that all vehicles and automotive goods we supply — including spare parts and accessories — meet the standards of the country of destination, and where possible, the manufacturer's original specifications.
- ↘ Our team takes due diligence in verifying product condition, functionality, and suitability before delivery.

## Our Commitment

- ↘ Ensure that products are inspected, documented, and quality-checked before handover or shipment.
- ↘ Follow applicable UAE export laws and import standards in target markets to ensure compliance.
- ↘ Promptly address any product complaints, quality issues, or safety concerns raised by clients or partners.
- ↘ Educate clients on vehicle use, maintenance needs, and compliance with road safety standards.

# Research and Development Activities

We promote innovation and responsible sourcing by respecting the rights of others and seeking continuous improvement.

## Our Policy

- While Cruise Motors does not conduct R&D in the traditional manufacturing sense, we continuously seek new sources, configurations, and market insights to better serve our clients.
- We rely on fair, legal, and ethical practices when researching suppliers, verifying product configurations, or accessing market intelligence.
- We do not tolerate the misuse of intellectual property or unauthorized sharing of proprietary information from any party — suppliers, clients, or competitors.

## Our Commitment

- Gather product and market data through ethical channels only.
- Use research findings to build strong, trust-based relationships with customers and suppliers.
- Respect confidentiality and intellectual property rights of manufacturers, distributors, and business partners.
- Seek supplier innovation through transparent and professional engagement, not imitation or reverse engineering.

# Procurement Activities

We follow the highest ethical standards in working with suppliers, vendors, and logistics partners.



## Our Policy

- ↳ Cruise Motors aims to establish long-term, trust-based relationships with reputable suppliers and vendors.
- ↳ We prioritize working with partners who share our values of fairness, transparency, and reliability.
- ↳ Supplier selection is based on objective and clear criteria, including price, availability, product quality, after-sales support, and responsiveness.

## Our Commitment

- ↳ Treat all suppliers fairly, regardless of deal size, country, or contract duration.
- ↳ Conduct thorough due diligence before onboarding any supplier, freight forwarder, or export partner — with a focus on:
  1. Respect for labor rights and ethical sourcing
  2. Financial and legal credibility
  3. Technical competence and shipping reliability
- ↳ Avoid conflicts of interest and disclose any personal or financial ties that could influence decisions.

# Sales Activities and Fair Competition

We deliver quality vehicles and services through honest, transparent, and competitive business practices.

## Our Policy

- ↳ Cruise Motors sells vehicles, spare parts, and accessories through fair, legal, and ethical competition.
- ↳ We maintain transparent pricing, clear terms, and accurate communication with our customers and sales partners.
- ↳ We build dealer and client relationships based on mutual benefit, integrity, and long-term value.



## Our Commitment

- ↳ Put the customer first — ensure clarity and fairness in every deal.
- ↳ Represent our vehicles and services accurately in all offers, ads, and proposals.
- ↳ Avoid exaggeration or misleading claims in promotions and sales communication.
- ↳ Never engage in discussions with competitors regarding:
  1. Pricing
  2. Customer or territory allocations
  3. Bidding strategies or market manipulation
  4. Comply with UAE and international trade laws regarding competition and anti-collusion rules.

# International Business Activities

We operate across borders with respect for international law, local customs, and regulatory compliance.



## Our Policy

- ↳ Cruise Motors complies with all applicable UAE, regional, and international laws and trade regulations in our export, shipping, and procurement activities.
- ↳ We respect the culture, legal systems, and trade customs of every country we deal with — including Africa, Europe, and the Middle East.
- ↳ We aim to strengthen global relationships while contributing to local economies and communities.

## Our Commitment

- ↳ Respect the laws, traditions, and expectations of each region where we sell or operate.
- ↳ Comply with:
  1. Import/export control laws
  2. Economic sanctions and embargo regulations
  3. Local customs clearance and documentation requirements
- ↳ Do not engage in transactions involving restricted entities or embargoed nations, unless licensed or authorized.
- ↳ Maintain proper documentation for:
  1. Product classification
  2. Country of origin
  3. Invoice values

# Confidentiality and Data Protection

We maintain complete, timely, and accurate records to ensure accountability and compliance.

## Our Policy

- ↳ Cruise Motors maintains clear and reliable records related to all business transactions, including sales, shipments, payments, and supplier contracts.
- ↳ We are committed to providing accurate financial disclosures and complying with UAE tax and regulatory requirements.
- ↳ All financial and business documentation is maintained with integrity and supports legal, accounting, and auditing standards.



## Our Commitment

- ↳ Record all assets, liabilities, payments, receivables, and contracts in the correct period, with complete and accurate information.
- ↳ Ensure all documents — including purchase invoices, sales orders, packing lists, and export paperwork — are organized and traceable.
- ↳ Use accurate records to improve decision-making, assess business risks, and maintain compliance with legal and financial frameworks.
- ↳ Report and correct any errors or discrepancies as soon as they are identified.

# Asset Protection and Confidentiality

We protect company assets and information with responsibility, discretion, and security.

## Our Policy

- ↳ Cruise Motors secures both tangible assets (vehicles, funds, documents, IT systems) and intangible assets (data, customer info, trade secrets).
- ↳ We treat all confidential information — including supplier agreements, pricing structures, client contacts, and deal terms — with the highest level of care and access control.
- ↳ We are committed to continuous improvement in cybersecurity and asset protection, using modern systems and safe practices.

## Our Commitment

- ↳ Safeguard company assets from loss, misuse, or damage.  
This includes:
  1. Inventory (vehicles, spare parts)
  2. Laptops, phones, and files
  3. Bank and document access credentials
- ↳ Use company-issued devices strictly for professional purposes.  
Treat them as company property.
- ↳ Secure all data, both digitally and physically — especially trade contracts, invoices, and personal customer records.
- ↳ Report any loss, misuse, cyber incident, or suspected breach immediately.

# Insider Trading

We protect confidential information and do not misuse it for unfair advantage.



## Our Policy

- ↘ Cruise Motors handles sensitive, confidential, and nonpublic information including pricing, sourcing strategies, upcoming deals, and financial data.
- ↘ We strictly prohibit using such information for personal gain, sharing it with outsiders, or engaging in any behavior that could resemble insider trading or unethical influence.
- ↘ Even though Cruise Motors is not a publicly listed company, we uphold the same standard of information protection in all business and financial matters.

## Our Commitment

- ↘ Share confidential information internally only on a need-to-know basis.
- ↘ Do not discuss client files, financial forecasts, pricing terms, or pending deals with external parties, including family and friends.
- ↘ Avoid using inside information for speculative decisions or financial manipulation in business settings.
- ↘ Protect all deal-sensitive information until officially released, disclosed through approved channels, or confirmed with stakeholders.



# CHAPTER 4

## With **Fairness**

# Anti-Bribery and Anti-Corruption

We never offer, accept, or tolerate bribes or corrupt practices in any form.



## Our Policy

- ↘ Cruise Motors FZCO does not pay or accept bribes, and we prohibit facilitation payments or any improper advantages.
- ↘ We comply fully with UAE anti-corruption laws, as well as international standards when dealing with foreign governments, suppliers, or clients.
- ↘ We define:
  1. Bribe: Anything of value offered to gain undue business advantage or influence decisions.
  2. Corruption: Misuse of position or power for personal gain.
  3. Facilitation Payment: Payment to speed up routine actions the company is already entitled to.

## Our Commitment

- ↘ Never offer or accept bribes, in cash or in kind.
- ↘ Avoid facilitation payments, even if requested to "expedite" services. Verify the status of every business partner, especially if they're linked to government officials or public institutions.
- ↘ Only provide gifts, donations, or hospitality that are:
  1. Legal
  2. Modest in value
  3. Transparent
  4. Approved by management
- ↘ Adhere to fair hiring practices — especially when receiving referrals from government-linked individuals.

# Gifts, Entertainment and Hospitality

We give and receive gifts or hospitality only when they are reasonable, transparent, and never intended to influence decisions.

## Our Policy

- ↳ Cruise Motors FZCO values long-term business relationships built on trust — not favors.
- ↳ We only offer or accept modest, appropriate, and lawful gifts or hospitality, and only when clearly linked to a legitimate business purpose.
- ↳ Lavish or excessive gifts, or those that could be seen as bribes, are strictly prohibited.

## Our Commitment

- ↳ Comply with UAE laws and Cruise Motors' internal rules when giving or receiving gifts or hospitality.
- ↳ Gifts must never be offered or accepted to influence business decisions or secure unfair advantages.
- ↳ Record and report all expenses related to gifts or hospitality.
- ↳ Only accept third-party gifts that are:
  1. Reasonable in value
  2. Permitted by law
  3. Approved by management
- ↳ Decline any gift that might create a conflict of interest or risk reputational harm to the company.

# Anti-Money Laundering (AML)

We actively prevent the use of Cruise Motors for money-laundering or illegal financial activities.

## Our Policy

- ↳ Cruise Motors FZCO only works with reputable clients, suppliers, and financial institutions.
- ↳ We strictly comply with UAE and international anti-money laundering laws.
- ↳ We prohibit any use of our business for the concealment or processing of criminal proceeds.
- ↳ Definition:  
Money laundering is the process of disguising the origins of money obtained through illegal means to make it appear legitimate.

## Our Commitment

- ↳ Conduct thorough KYC (Know Your Customer) and due diligence before onboarding clients or suppliers.
- ↳ Be vigilant of warning signs, such as:
  1. Large cash transactions
  2. Overpayments followed by refund requests
  3. Refunds to different accounts than originally used
- ↳ Report any suspicious behavior or transactions immediately to management or legal counsel for review and escalation.
- ↳ Maintain clear and accurate financial records to detect and prevent abuse of the financial system.

# Avoiding and Disclosing Conflicts of Interest

We uphold transparency and integrity by avoiding any conflicts between personal interests and business responsibilities.

## Our Policy

- ↘ Cruise Motors FZCO does not tolerate any conflict of interest that compromises the integrity of our operations.
- ↘ Employees must ensure their personal interests do not interfere with the company's best interest.



## Our Commitment

- ↘ Act with honesty and impartiality in all business dealings.
- ↘ Prioritize the interests of Cruise Motors FZCO above personal or external relationships.
- ↘ Avoid and disclose situations such as:
  1. Hiring or supervising a family member or romantic partner;
  2. Competing with Cruise Motors or supporting a competitor;
  3. Using company property or confidential information for personal gain;
  4. Holding financial interests in companies that do business with Cruise Motors;
  5. Influencing deals where a relative or close associate is a decision maker;
  6. Accepting gifts or benefits from external parties during negotiations.
- ↘ Promptly disclose any potential or actual conflict to management or compliance for proper review.

# Speak Up

- At Cruise Motors FZCO, we believe that raising concerns or asking questions about unethical, unsafe, or suspicious behavior is a responsibility shared by all team members. If you're ever unsure about what action to take or witness misconduct, we encourage you to raise the issue. You can speak up confidently—even if you're uncertain whether a violation occurred. What matters is that you raise your concern early, so it can be reviewed fairly and promptly. Cruise Motors FZCO is committed to reviewing all reports thoroughly and taking action when necessary to prevent further issues.

## How to Report a Concern

- You can raise concerns through:

Your Supervisor – Speak to your direct supervisor or department manager.

Internal Resources – Contact our HR, legal, or compliance representatives.

Confidential Reporting Channel

 Email: [info@cruisemotors.co](mailto:info@cruisemotors.co)

 Portal: [www.cruisemotors.co/speakup](http://www.cruisemotors.co/speakup) (under development)

 Phone (confidential hotline): +971 56 133 1109

You can report anonymously, where permitted by law.

## Non-Retaliation Commitment

- Cruise Motors FZCO strictly prohibits any form of retaliation against individuals who report concerns in good faith or participate in investigations. This includes dismissal, demotion, harassment, or any other adverse action.
  - Retaliation is a violation of this Code and is subject to disciplinary action.
  - Attempts to identify whistleblowers will also be treated as retaliation.
  - Concerns about retaliation must be reported immediately through any Speak Up channel.