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RESPONSIBLE MARKETING POLICY

PURPOSE

At FIVE Holdings (hereinafter referred to as FIVE or the Brand), we aim to follow our initiative on ‘Sustainability without Compromise’. FIVE takes pride in the fulfilment of sustainable responsible marketing policies across all FIVE operations and products.

FIVE is committed to developing, producing, marketing, and selling all its products and services responsibly and conducting marketing activities in line with societal expectations, our sustainability goals, our business goals and our values

Our Responsible Marketing Policy is developed in accordance with and is consistent with the International Code of Commerce’s Code of Advertising and Marketing.

POLICY OBJECTIVES

The objectives of this policy to herby implement best communication practices are:



Through this policy, FIVE intends to -

- Be ethical in its marketing practices and not share any information which is misleading or may cause harm to the company, its employees or any external communities
- Enhance the corporate reputation of MHI through an accurate and appropriate representation of the image of the Company.
- Create and maintain the communication channels required to guarantee all stakeholders have the opportunity to participate in our leadership and reputation
- Ensure all external content used does not infringe on a person’s or company’s copyrights. Use the authorized trademarks and logos only as per the organization’s defined framework
- Follow the regulations of the competent authorities including Dubai Health, Sustainability, Federal Customs Authority and Federal Environment Agency, and the Dubai Media Council
- Adhere to the company’s Code of Conduct

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Furthermore, we recognize that we have the obligation to be realistic and transparent when marketing our products and services to customers. This document aims to clarify our stance on responsible marketing and communicating with customers while emphasizing the actions we are taking to ensure we put our commitment into practice.

APPLICABILITY

This policy applies to all internal and external corporate and commercial communications issued by FIVE and/or any entity within its Group through any channel or system.

This Policy is applicable globally and is mandatory for both Company employees and any third parties with whom the Company has any type of relationship that involves any type of communication, particularly the agencies and professionals hired by FIVE or any group companies.

This Policy defines minimum requirements without prejudice to any additional or specific regulations that may be approved on the subject nor any specific legal regulations that may be applicable in any country in which the Company or any Group company operates.

RESPONSIBLE MARKETING PRINCIPLES

FIVE is committed to complying with international best practice when it comes to responsible marketing practices and ensure alignment with our sustainability strategy and goals and applicable laws and regulations. Following principles shall be adhered to as a part of our marketing activities:

Truthful and transparent communication

- All the information provided to our customers through our marketing channels and products and services are accurate. We ensure simplicity in our communication messages to avoid conveying misleading information. We make information easily accessible, understandable, and distinguishable.
- We always try to be as authentic as possible and use real people and characters in all our audio, visual or print communication across channels. We will not make any claims that will be likely to mislead or deceive customers
- We make our best effort in providing all information needed by customers to make their selection through the wide array of services offered
- We speak in an approachable language to convey easy and straightforward information
- The Brand is committed to make information easily accessible to all consumers and to reduce barriers to gain all necessary information about the product by directly engaging with consumers through its various digital platforms such as social media community management

Pricing

- All information required to make informed decisions shall be presented to consumers, including but not limited to clear pricing and accurate pricing implementation.
- No elements of cost are hidden in sharing price elements with customers across our public domains or contracts. We ensure complete transparency and are committed to provide clear and correct pricing to all our parties.
- As a part of our marketing communications (online - social media platforms, website, IPTVs and offline - banners and posters), we provide clear information on pricing for all our packages, room and F&B packages, etc.

Accuracy

- Our marketing practices follow an accurate and balanced approach

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- All marketing is truthful, accurate, not misleading fostering a community of informed customers to make decisions that are suitable to their lifestyle
- All marketing promotes a balanced representation of product and sense of place wherein customers are provided information across a variety of brand channels including but not limited to website, social media, and digital networks, as well as clearly labelled third- party content, such as User Generated Content, Blogs, and Online reviews

Objectivity

- Communication will be objective and not include subjective opinions. Data and statements are checked and verified before publishing
- Testimonials must reflect a genuine, informed and current opinion of the person giving the testimonial

Identifiable

- The usage of different types of content is supported to provide customers with options of information seeking. All our communication is made clearly distinguishable
- All external sources are duly credited before publishing any information on marketing channels (eg. clear labelling in editorial context in articles, blogs or any other material being published) and exclusion of any form of product placement
- No sources are disguised as 'user-generated content', 'market research', 'found online' etc. for marketing
- FIVE's communication is available in the official local languages that apply to any advertisements' region it is released in. All information such as website is available in more than one language at a time

Authenticity

- All content is authentic as well as a balanced representation of product, sense of place and targeted customers
- The Brand engages in fair and transparent promotion of the product to empower customers to take informed decisions. First-hand experience and the usage of real video footage is encouraged through all the brand platforms
- FIVE follows a formal, consistent, and coherent communication approach which is in line with its branding guidelines
- FIVE ensures simple communication messages to avoid conveying misleading information

Inclusive

- Our messages will encourage diversity and inclusion in all forms, by ensuring our content is cognizant of cultural expectations, use channels that can reach and meet a wider range of people with different needs
- We will not use any images, symbols, figures or language that are likely to be considered gratuitously offensive or demeaning to any gender, race, ethnicity, religion, culture, sexual preference, disability or minority group

Decent and Socially Acceptable Communication

- All communications foster a respectful open-minded community which promotes diversity and does not engage in any confrontational topics and discussions that may be offensive to any group or person based on currently prevailing standards of decency including social, racial, ethnic, religious, gender, age, or physical traits
- We endeavor to uphold standards of decency in its marketing and communication activities which maintains dignity of all individuals and does not encourage discrimination on any grounds or causes disrespect for human dignity
- All content created follows fair and responsible marketing. No harmful messages will be conveyed, nor harmful channels and the negative use of brand channels is allowed
- We do not promote or engage in any discussion related to confrontational topics, objectification or involving sexual discrimination

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- We will only use language which is appropriate in the circumstances. Strong and obscene language shall be avoided
- We will not depict or suggest predatory sexual, violent behaviour
- We will not associate, use language, mimic or profile means of consumption of tobacco, e-cigarettes, vaping, illegal drugs, drug culture or behaviour associated with illicit substances

Ensuring data privacy

- We take the privacy and security of the data of our employees, business partners and guests very seriously
- We follow guidelines laid out as per the company's Information Security and Data Protection Policy. No stakeholder information or information from external sources (including personal information, photos) is shared without obtaining prior consent of the respective stakeholders in marketing activities
- We ensure the security of the collected personal information, including protection against unauthorised processing, accidental loss, and damage.
- The data can only be revealed where the disclosure is required by law enforcement authorities or other government and private organisations who have issued a lawful disclosure request for personal information

Maintaining safety and security

- Our marketing communications will not depict material contrary to prevailing community standards on health and safety and we will take reasonable steps to ensure they do not have any unintended consequences
- We will not depict or encourage images or practices that are likely to result in reasonable people placing themselves in unnecessary danger, or that are likely to have an adverse health impact
- Communications will not depict or be addressed to at-risk groups and will never show a pregnant woman drinking alcohol or encourage pregnant women to drink alcohol
- We will only prominently feature people who are over 21 years of age (legal age as per local laws and regulations), unless there is no suggestion that they have just consumed or are about to consume alcohol and they are part of a natural crowd or background scene

Clear communication on Environmental Consciousness

- When we communicate claims about a brand's environmental credentials to consumers, or use our brands to celebrate our environmental performance, all claims must be truthful and factual; relevant to the product or service and its actual environmental impacts; and substantiated and verifiable ensuring it is in line with the principles of transparency and accountability
- We will not depict littering or otherwise inappropriate means of disposing our containers and packaging except when making a proactive statement for proper disposal or recycling
- Environmental claims must be able to be substantiated and verifiable. Supporting information must include sufficient detail to allow evaluation of a claim
- Any environmental claim relating to future matters or commitments must be based on reasonable grounds

Freedom of choice

- Employees involved in marketing activities must show respect for people who choose not to buy our products or avail our services, and ensure there is sufficient information about our products and services for consumers to make informed choices

User generated content community guidelines

- We will not condone any user-generated content (UGC) that would promote inappropriate or excessive alcohol consumption, or indeed any content that contravenes this Code or any aspects of local codes or contexts

Responsible marketing with children

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- Our advertising content shall be in-line with the principles and standards of applicable media content and age rating laws, regulations and guidelines. Accordingly, we are committed to uphold the standards
- No harmful messages, whether directly or indirectly, will be conveyed to any children, or customers
- We will ensure to avoid promotional material that undermines a parent's influence and authority
- We will encourage parents to engage in/or supervise their children's interactive activities
- Children should be under adult supervision for any product and activity that includes safety risk
- Products unsuitable for children should not be marketed in targeted media
- Marketing the possession or use of a product should not indicate that children will have a physical, physiological, or social advantage over other children

Sustainable Marketing Practices

- We are committed towards building a sustainable world through our 'Sustainability without Compromise' initiatives and wish to incorporate the same in our marketing practices.
- A digital first approach, to reduce paper usage in advertising and on-ground consumer experiences, such as providing consumers with digital choices over print collaterals. The promotion of in-house dining menus compared to delivery or takeaway to reduce packaging.
- We will focus on digital marketing and will divert from paper printing and usage
- We will avoid any negative use of social media
- We will prioritise buying/selling locally, reducing transportation energy, and supporting the local economy
- We will reduce business travel and offer webcasting as an alternative to live events

Employees involved in Marketing activities shall not be involved in the following practices:

- Alter images used in marketing communications in such a way that advertising is rendered misleading
- Pictures of children which are used for marketing purposes make sure that children are not portrayed unethically. FIVE does not indulge in any form of poverty-centered marketing.
- Misuse technical data or use scientific terminology or vocabulary in such a way as falsely to suggest that a claim has scientific validity
- Associate our products or services with, or feature within any FIVE marketing, themes, figures, or images likely to cause serious or widespread offence to any religion, nationality, culture, gender, race, sexual orientation, age, disability, or minority group

POLICY COMPLIANCE

Policy compliance applies globally to FIVE employees and third parties hired by the Brand. The implementation across all brands is controlled and monitored through the Brand Marketing and the Sustainability teams within the FIVE structures:

- FIVE engages only with locally reputed and legally accepted entities to ensure third party compliance with its marketing guidelines
- All new hires' onboarding includes a thorough brand onboarding training on its marketing policies. Additional detail training is provided to the brand team itself.
- FIVE has implemented a cohesive approval process for any brand marketing activities for any of FIVE's products and services before being released to the market. Approvals shall only be given by ADD
- Scope of coverage and compliance also applies to any third parties such as celebrities, public figures, as well as media such as TV, radio, print, social networks, and similar modes
- Advertise in any media known for promoting violence, pornography, or insulting behavior
- The Brand has fostered a digital community wherein the negative usage of social media by the Brand or consumers in relation to the brand is monitored and prohibited



FIVE has installed its own marketing brand team and encourages the development of internal marketing resources over third parties to ensure compliance throughout all marketing activities.

Disclaimer: Under no circumstances shall the company or its affiliates, partners or suppliers be liable for any mishaps done by third parties on our communication channels that may interfere with our commitment to our policies.

Accountability:

Compliance to this policy is everyone's responsibility. All people are required to have full knowledge of this and are responsible for following it in letter and spirit. Equally, we require our external partners and agencies involved in the marketing and promotion of our brands to have comprehensive understanding of the policy and their obligations to implement it across everything they do. FIVE cannot be held responsible for activities of third parties outside of our reasonable control. Examples of activities or marketing communications that are not likely to be within our reasonable control include unauthorized product fan sites or product placement over which we have had no reasonable control.

Governance:

All commercial communication will be reviewed for compliance according to the local approval process involving the Marketing team are accountable for ensuring all activity is compliant with this policy.

Feedback about the policy is welcomed and can be directed to FIVE Corporate External Relations function who maintain and manage it internally throughout FIVE.

Training and education:

All FIVE people involved in the marketing of our brands will receive training on the policy. Newly recruited FIVE staff will receive training on the policy as part of their induction and regular refresher training should be provided for relevant staff on an annual basis. Equally, our external agencies and partners are required to complete annual training.

Contracts and agreements

Where appropriate, include reference and conditions to comply with the policy as a term in new contracts of engagement for marketing and promotional services.

Customer feedback

FIVE is a brand for everyone and empowers consumers to share their experience on the brand platform via reviews, social media engagement and content exchange, as well as the Brand engages real people in their marketing visuals and activities.

Complaints

Any complaints or criticisms of FIVE's marketing activities should be reported immediately to the Marketing teams in order to review the complaint, take the necessary action and maintain our commitment to responsible marketing.

All correspondence regarding complaints must be properly addressed and stored and registered for audit purposes.

COMMUNICATION

FIVE has communicated the responsible marketing practices to all its key stakeholders via email. All marketing, public relations teams monitor compliance to this policy.

This policy is hosted on the company's intranet portal for ease of access to all employees. Further, this policy is published on FIVE's website.

This policy is reviewed yearly by the Group Director of Marketing and Public Relations to modify in case of any new amendments to existing regulations/ new regulations with respect to responsible marketing practices.

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In case of any concerns with the policy guidelines, kindly reach out to the Marketing Team or Public Relations team for assistance.