



UTP GROUP MARKETING POLICY

It is UTP Group's policy to comply with global marketing standards and promote ethical business practices across all its operations. UTP Group is committed to conducting marketing activities in a responsible and transparent manner, adhering to applicable laws and regulations in each market it operates. The company strives to maintain the highest standards of integrity, honesty, and fairness in all marketing communications. UTP Group is dedicated to providing accurate and truthful information about its products and services, ensuring that any claims made are substantiated and supported by evidence. The company respects consumer rights, privacy, and data protection, and seeks to build trust and long-term relationships with its customers and stakeholders. Through its global marketing policy, UTP Group aims to uphold its reputation as a trusted and socially responsible organization in the global marketplace.

1 Purpose

UTP Group's Marketing Policy ("Policy") presents guidelines (general and specific) on UTP Group's commercial advertising and marketing actions, including all business units and related companies/institutions, as well as suppliers, service providers, customers, social institutions and partners, among other stakeholders.

The purpose of this Policy is to ensure compliance with applicable regulation and good practices in marketing, sales, advertising and branding activities, ensuring that the communication of products and services is done in a responsible, ethical and transparent manner, respecting all the precepts of sustainability, diversity and consumer rights, in line with the guidelines of all other UTP Group Policies.

2 Scope

This document applies to all UTP Group employees, areas, brands, business units and related companies/institutions, in addition to suppliers, service providers, customers, social institutions and partners of the company.

3 Terminologies

Marketing: is the set of strategies and actions for promotion, dissemination and sales of our products with the objective of strengthening our brands, conquering new customers and retaining customers who already buy our products.

Commercial promotion: are non-routine actions with a specific objective. It is the offer of valuable experiences and actions that strengthen our brands, such as promotional coupons, special promotions, gifts, etc.

Advertising: is the marketing strategy that involves the purchase of a space in a media to promote a product or a brand, in order to reach our target audience and encourage them to buy our products and services. It can be qualified as a "commercial advertisement".



A TAURANI HOLDINGS COMPANY

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Please direct all communications to the appropriate entity.



Business Units: Entities including the registered entities of UTP Group, **Universal Tube and Pipe Industries FZE** having its registered office at P. O. Box: 16879, Jebel Ali Free Zone, Dubai, UAE & **THL Tube and Pipe Industries LLC** with having its registered office at P. O. Box: 49695, Dubai Investments Park-2, Dubai, UAE.

Exclusive Brands: are the product brands that are part of the UTP Group. They are Nexum, Qua & Magnus. Exclusive Brands are developed with strict standards, quality control and following market trends and needs.

Interested Parties or Stakeholders: also known as strategic audiences, they are all relevant audiences with interests relevant to UTP Group, or individuals or entities that assume some type of risk, direct or indirect, in relation to society. Among others, the following stand out: shareholders, employees, community, customers, suppliers, creditors, governments and non-governmental organizations.

Diversity: is the set of characteristics, cultural, biological, social, economic, among others, that make each individual a unique being. In the business context, it is related to the representation of different groups that make up society in the workforce.

4 General Guidelines

Marketing actions are part of our relationship and engagement strategy with our stakeholders, seeking to satisfy their needs, through quality products and services that match the announced characteristics, as well as expectations, in a transparent, respectful and consistent manner. These actions must express the offers and/or messages clearly and guarantee the fulfillment of what is agreed.

Through these actions, we seek to raise awareness of our stakeholders through our communication channels, promoting more sustainable practices and attitudes with less environmental impact.

This Policy must comply with all of UTP Group's Corporate Policies, Procedures and Regulations. Likewise, ensure strict compliance with current legislation regarding the distribution of advertising material, promotional actions and visual communication of all products and services, meeting the specifications and standards defined by the regulatory bodies in the Country (at the federal, state and municipal levels) in order to ensure that, in the event of any infraction, it is immediately corrected.

4.1 Relationship and Respect with the Consumer

Any and all marketing actions, campaigns and/or advertising in the media, and/or in all sales channels, whether internet, television media, sales platforms and/or physical points, must be respectful, clear, objective and transparent and must be in line with the Consumer Rights/Protection, among other rules that deal with the subject, especially those mentioned in the references below.

Our marketing, promotion and sales practices are regularly evaluated by the concerned team, always seeking to improve our practices and policies. UTP Group is responsible for establishing mechanisms that ensure



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compliance with legislation and internal policies related to the sale of products and services, as well as product labeling and consumer information, seeking to constantly encourage conscious consumption, sustainability, health and well-being in our brands and businesses.

We are committed to the confidentiality of the personal information of our customers, employees and other stakeholders, subject to the terms and conditions of our [Privacy Policy](#).

4.2 Diversity and Inclusion

In order for everyone to be respected in communication, advertising, and other promotional materials for UTP Group's products and its exclusive brands, it is the responsibility of everyone involved with communication actions (internal and external) to ensure the production, validation and dissemination of content free from discrimination, without stereotypes and that comply with the principles: accessibility, representativeness, clear and without barriers language; and sustainable consumption.

4.3 Conscious consumption

UTP Group recognizes the importance of sustainability and environmental responsibility in its marketing efforts, promoting the benefits of its products while minimizing any adverse impacts on the environment.

One of the pillars of UTP Group's sustainability strategy is the promotion of supply and reliable consumption. As a link between suppliers and customers, we are aware of our responsibility to co-build healthier and more sustainable products and services with our chain and encourage our consumers to choose these products.

5 Specific Guidelines

5.1 Internal Engagement & Awareness

We understand that the implementation and adherence to this Policy depends on the engagement of internal teams, from the leadership to the operational areas.

Thus, the Group's employees involved in the Communication and Marketing process are frequently trained and updated on respect for consumers, inclusive communication, fighting stereotypes, and other good practices with regard to the promotion, sales and communication of our products and services from the perspective of sustainable practices.

5.2 Relationship with Suppliers

All suppliers must follow the laws and regulations, know the values and respect the ethical principles, establishing business relationships in an integral and exemplary manner, following the standards.



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The hiring of communication vehicles, event and/or advertising agencies, promotional actions, among others, must always occur through technical, legal and ethical conduct criteria that attest to the qualification for the action and also aligns with the regulations mandated by the country.

5.3 Provision of Communication and Marketing Materials

It is the responsibility of the Marketing Department to oversee UTP Group's communication strategy, brands, products and services. When necessary and in line with the communication proposal, it must make publicity material and institutional campaigns available in all units and/or other vehicles and media. For this, it is necessary to prepare and make available guidance guides, for all teams involved, containing the amount to be disclosed, disposition guidelines, time and spaces, among other points considered important to ensure the best operation and communication to the consumer.

The production of any material by any area, store or team is prohibited without the proper formal consent of the Marketing team. Likewise, the use or mention of the UTP Group brand(s) and/or any product in electronic, printed, or internet parts is prohibited without the authorization of the aforementioned departments.

5.3.1 Promotions

Any and all commercial promotions must have their own regulations with clear and transparent rules regarding the scope, validity, impacted public, forms of participation, forms of redemption of the prize, if applicable, ensuring clear and objective communication for the final consumer participants.

5.3.2 Approvals

All content, materials, and merchandise must adhere to UTP Group's values and messaging and be consistent with the company's ethical, legal, and branding guidelines.

- Social Media & Public Sites: Any content to be shared on social media platforms or public websites must be approved by the Marketing team prior to publication. This includes posts, articles, and comments representing UTP Group or its brands.
- Photos & Videos: All images and videos intended for public distribution, including product photos, event captures, and promotional videos, must be reviewed and approved by the Marketing Department to ensure alignment with UTP Group's brand guidelines and standards.
- Brand Printing: Any printed materials (e.g., brochures, banners, posters) bearing UTP Group's name, logo, or trademarks must undergo Marketing Department approval to ensure brand consistency and compliance with the company's guidelines.
- Merchandise: All branded merchandise (e.g., clothing, accessories, giveaways) must be approved by the Marketing team before production or distribution to ensure proper representation of UTP Group's image and adherence to the standards.



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5.4 Monitoring and Validation

To ensure that marketing and sales practices comply with the requirements set forth in the Consumer Protection Code, as well as other applicable regulations, UTP Group's marketing team and top management is responsible for validating and evaluating all communications and materials related to marketing and sales practices directed at consumers. This includes ensuring compliance with relevant laws and regulations concerning the products.

6 Exclusive Brands

This Policy also covers any and all communication involving our Exclusive Brands, developed with strict quality control and following market trends and needs.

6.1 Products (Labeling)

For our Exclusive Brands, the content of the labels follows current legislation and the standards that govern each type of product, with instructions for use, information on handling and conservation, description of substances that may generate social and environmental impacts.

7 Restricted Products

We are committed to complying with all laws and guidelines related to the sale, communication and disclosure of restricted products, such as Non-Compliant Materials and other Restricted Substances, alcoholic beverages, tobacco, smoking and all banned products or services including banned narcotics.

8 Prohibited content

We are committed to complying with all laws and guidelines related to the Advertising Standards, prohibit the publication of words and pictures that breach public morals. Prohibit the spread and dissemination of information that may prejudice children, women or any other members of society. The Advertising Standards also prohibit the provocation of violence, hatred and sectarianism via advertising content.

9 Complaints Channel

Failure to comply with the rules and guidelines set forth in this document may be considered serious misconduct, subject to the application of sanctions based on all UTP Group's Policies and Code of Conduct.

As an official reporting channel for receiving complaints, concerns, and allegations of violations or non-compliance with this Policy, UTP Group provides an exclusive complaints channel via marketing@utpgroup.co. This channel is available to employees, customers, suppliers, subsidiaries, social institutions, and external parties with commercial or institutional relations with the Group.



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The complaint will be investigated in a confidential manner, even allowing for anonymity.

Contact: UTP GROUP – 048835966 / 048848221

Office hours: Monday to Friday, from 9 am to 6 pm and Saturday from 9 am to 3 pm.

10 References

Internal documents:

- UTP Group Sustainability Policy;
- UTP Group Environmental Policy;
- UTP Group Code of Conduct;
- UTP Group Privacy Policy

External documents:

- Advertising content policies from National Media Council
- Federal Law No. 15 of 2020 on Consumer Protection

11 Policy Update

This Policy is valid for an indefinite period and without prejudice to the provisions contained therein, UTP Group reserves the right to revise it, as often as it sees fit.

Signed By:



Sumit Ghoshal (Dec 25, 2024 20:22 GMT+4)

Sumit Ghoshal
Chief Executive Officer

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(Internal Use Only)

Prepared By:	Approved By:
Karthika T K, Sr. Marketing Executive	Sumit Ghoshal, CEO
Date: 16/12/2024	Date: 25/12/2024



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