



أبو ظبي لتمويل
ABU DHABI FINANCE

Abu Dhabi Finance PJSC is a subsidiary of the Mubadala Group and, as such, operates under the Mubadala Group Code of Conduct.

All suppliers performing work for or on behalf of Abu Dhabi Finance PJSC are henceforth expected to adhere to the Mubadala Group Supplier Code of Conduct, which is set out in the following document.

If you have a concern about the conduct of Abu Dhabi Finance PJSC or an Abu Dhabi Finance PJSC employee, contractor, representative, or counterparty, you can reach the Abu Dhabi Finance Compliance team at:

Email: compliance@adf.ae

Post: Aldar HQ 7th floor
P.O. Box 107616
Abu Dhabi, UAE

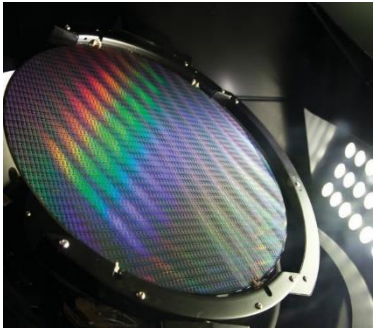
I agree to follow the Mubadala Group Code of Conduct at all times in my role as a Supplier performing work for or on behalf of Abu Dhabi Finance PJSC.

Signature _____

Name (printed) _____

Date _____

Mubadala Group Supplier Code of Conduct



The Mubadala Group¹ maintains the highest ethical standards in its business activities and expects the same from its Suppliers². Acting ethically requires, but is not limited to, complying with all applicable laws and regulations and conducting business with respect for principles of basic human rights and decency when interacting with both colleagues and external parties.

The Mubadala Group Supplier Code of Conduct (**Supplier Code**) sets forth minimum expectations for Supplier conduct performing work for or on behalf of the Mubadala Group. Failure to adhere to the standards of this Supplier Code may reflect negatively on a Supplier's relationship with the Mubadala Group and will be considered in future business determinations. For further information, questions or concerns about the Supplier Code, contact Mubadala Group Procurement at procurementhelpdesk@mubadala.ae.

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1. **Mubadala Group** means Mubadala Investment Company PJSC (**Mubadala**); any entity, operation, or investment controlled by Mubadala; and/or any entity, operation, or investment that adopts the Mubadala Group Code of Conduct.
 2. **Suppliers** means any party, including contractors and consultants, who supply goods or services to the Mubadala Group or to another party on behalf of the Mubadala Group.

Respect

Employment Practices: Suppliers must comply with all applicable employment laws, regulations, and standards in relation to labor practices and human rights, particularly those of the Emirate of Abu Dhabi, UAE. Suppliers are expected to pay fair wages, observe reasonable and safe working hours, including overtime, and offer medical insurance, to the extent required by law. All work should be voluntary, and employment obligations under country and industry laws and regulations should be strictly adhered to.

Fair Treatment: Suppliers must treat all employees and contractors fairly, operating with dignity, respect, and integrity. Suppliers must not discriminate, harass, intimidate, threaten, humiliate, or abuse their employees. Retaliation is also strictly prohibited.

Child and Forced Labor: Suppliers shall not use, employ, or seek to exploit in anyway the services of under-aged children, or slave or trafficked labor. This includes any form of indentured servitude, such as the use of physical punishment, confinement, and threats of violence as a method of discipline. In addition, other than as is permissible by law, Suppliers should not forcibly retain employees' identification, passports, work permits, or deposits as a condition of employment. Suppliers must require the same from any contractor or subcontractor employed to perform work for the Mubadala Group.

Healthy and Safe Workplace: A healthy and safe working environment must be provided to all employees. As a minimum, this includes potable drinking water and adequate lighting, temperature, ventilation, and sanitation. All facilities and housing conditions, if provided, must be constructed and maintained in accordance with the standards set by applicable laws and regulations. Contractors and subcontractors of Suppliers working on Mubadala Group projects must employ the same requirements.

Integrity

Anti-bribery and Corruption: The Mubadala Group has zero tolerance for any form of bribery or corruption. Suppliers are expected to comply with applicable anti-bribery and anti-corruption laws and to behave ethically in all business dealings for or on behalf of the Mubadala Group.

Improper Payments: Suppliers are prohibited from offering, promising, giving, requesting, or accepting improper payments, e.g., a bribe, a “kickback,” or anything of value (including gifts, meals, entertainment, etc.) directly or through a third party in an attempt to improperly gain or retain business or to influence a decision. Suppliers should not make payments to government employees to expedite the timing of activities that the government employee is required to perform (e.g., processing visas, customs declarations, etc.) except if it is an official express service offered by the relevant government entity.

Gifts and Entertainment: Because gifts and entertainment may be used to disguise bribery and corruption, the Mubadala Group requires that Suppliers only offer or accept gifts or entertainment that are reasonable, directly related to a proper business purpose, and are in accordance with local laws governing such activity. Cash or cash equivalents are not permissible. Any offer of a gift or entertainment during an open bidding process in which the Supplier is involved is strictly prohibited.

Supply Chain: Suppliers must carefully scrutinize, select, and monitor the third parties they use who will act for or on behalf of the Mubadala Group and conduct appropriate diligence and background checks, considering the activity, origin, and government interaction of the third party. Third parties, contractors, agents, or subcontractors should be selected based on merit and competitiveness. Suppliers are responsible for ensuring their own third parties comply with this Supplier Code and applicable standards and policies with respect to business conducted for or on behalf of the Mubadala Group.

Competition: Suppliers are expected to comply, at a minimum, with the competition laws in the countries where they operate or sell products and services. They must not coordinate market conduct with competitors or their own suppliers in a way that improperly restricts competition. Suppliers must also not discuss internal or material non-public business information, such as prices, discounts, pricing policy, profits, market share, production levels, customers, or sales territories with a competitor, particularly concerning work performed for the Mubadala Group.

Transparency

Conflicts of Interest: Suppliers must avoid any activity that creates a conflict of interest or the appearance of a conflict of interest that brings into question objectivity or loyalty to the Mubadala Group. This includes conflicts of interest that may result from financial interests, employment, time commitments, outside directorships, stock ownership, friends/familial relationships, sponsorships or honorariums, and use of confidential information. Each Supplier acknowledges that it will not use its position to profit personally at the expense of the Mubadala Group.

Books and Records: Accurate and transparent books and records should be maintained at all times and demonstrate compliance with applicable laws and regulations. Suppliers must be watchful for and report internally any irregular payments, suspicious transactions, or suspected money laundering within a reasonable timeframe.

Audits and Assessments: Suppliers are expected to cooperate with internal and external investigators and auditors. They must notify the Mubadala Group, if allowed, of any investigation, audit, assessment, or unusual request that relates to the Mubadala Group or concerns the work the Supplier is performing on behalf of the Mubadala Group. In addition, the Mubadala Group and its appointed external representatives shall have the right to inspect and audit the books, records and accounts of the Supplier, as well as conduct operational audits, if requested.

Sustainability

The Mubadala Group is committed to preserving the environment, complying with all applicable environmental laws and regulations, demonstrating continual improvement in its environmental performance, and following industry practices to do so. Suppliers are obliged to minimize their waste of energy, water, and other resources, prevent discharge that would have an adverse impact on the environment, and recycle whenever possible.

Confidentiality

Confidential Information: Suppliers must safeguard Mubadala Group confidential and personal data and follow relevant data protection, privacy, and information security laws and regulations. In doing so, each Supplier agrees only to acquire and seek to acquire confidential information or personal data through proper means. That information must be kept secure and accessible only to those with a legitimate need to access it. Suppliers will not discuss, disclose, transfer, release, or share any confidential information or personal data concerning the Mubadala Group or anyone else without written consent from the Mubadala Group.

Competitive Information: Suppliers will not seek to obtain or use insider, material, or confidential information that belongs to competitors or other third parties. The Supplier will return any materials mistakenly, or otherwise, received containing such competitive information to the rightful entity.

Accountability

The Mubadala Group can fulfill its commitment to integrity and compliance only if its Suppliers share this commitment. The Mubadala Group therefore expects all of its Suppliers to be alert to any potential violations of law or of the Supplier Code in the context of the Supplier's relationship with the Mubadala Group and to notify the Mubadala Ethics & Compliance Office of any such concerns. Suppliers who represent the Mubadala Group or are effectively working as Mubadala Group personnel must immediately inform the Mubadala Ethics & Compliance Office if they are notified by a regulatory authority or other external party of an audit, investigation, lawsuit, or other inquiry regarding the Mubadala Group, if not prohibited from doing so.

The Mubadala Group requires its Suppliers to cooperate with the Mubadala Ethics & Compliance Office in the resolution of any concern, including making relevant documents, information, and employees available when requested and appropriate and by maintaining the confidentiality of any information related to such a request. The Mubadala Group strictly prohibits retaliation of any kind against anyone who reports a concern in good faith and requires the same of its Suppliers.

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