



مجموعة موانئ أبوظبي  
AD PORTS GROUP

# AD PORTS GROUP

## CODE OF CONDUCT AND BUSINESS ETHICS 2021

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# CODE OF CONDUCT AND BUSINESS ETHICS

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# CODE OF CONDUCT AND BUSINESS ETHICS

## MESSAGE FROM THE GCEO

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*Integrity and professionalism are the foundation of every business relationship. The highest standards of conduct and ethical behavior go hand in hand with the business goals, objectives, and services we provide to our customers. Abu Dhabi Ports Company PJSC (AD Ports) success has been, and continues to remain, based on a fundamental and genuine commitment to integrity and professionalism – at all times and in everything we do. This commitment must be embraced by each and every one of us. In addition, it should be fostered among those with whom we interact and, it must find unwavering support from all Relevant Person' in a leadership position at AD Ports.*

*For all our Relevant Person and any third party who works in a representative capacity, that means a strong sense of integrity, mutual respect, accountability, transparency and excellence, and pride in being associated with each other and being part of AD Ports. Our commitment to integrity and to our vision of being closely interconnected with our values guide our daily actions. AD Ports is committed to setting and maintaining high standards of governance that it applies both internally and externally. AD Ports follows very stringent standards when applying its' policies, procedures, codes, and better practice guidelines in conjunction with the law.*

*To reinforce the importance of living our mission/vision/values, a copy of AD Ports' Code of Business Conduct is provided to all Relevant Person. The Code of Business Conduct defines the values and standards by which AD Ports conducts business. It also identifies supporting resources that will help you learn more about specific policies and procedures to help you achieve and maintain compliance with these values and standards. For all of us at AD Ports, integrity must be about doing the right thing – and putting our values and words into action. Ethical Breaches put everyone at risk. The Code of Business Conduct must be read in its entirety and acknowledged by all Relevant Person and, it is recommended to any third party that conducts business with AD Ports.*

*The Code of Business Conduct brings together policies and standards of ethical behavior that reflect the integrity and values of AD Ports. We call on all Relevant Person and associates alike to dedicate themselves to maintaining trust with our Stakeholders and customers. Abu Dhabi Ports Company's "AD Ports" Code of Business Conduct is published in Arabic and English and distributed by AD Ports. Each Relevant Person is required to acquire a copy of this code for access and compliance.*



# CODE OF CONDUCT AND BUSINESS ETHICS

## SYNOPSIS

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### THE PURPOSE

The Code of Conduct and Business Ethics aims to outline the instructions and guidelines that need to be adhered to in order to:

- Uphold the highest standards of ethical behavior in all its business activities inside and outside the United Arab Emirates; and
- Reflect its Corporate values as described in Section 2.3 in all relationships with and responsibilities towards Relevant Persons and those dealing with it.

### THE SCOPE

- Code of Conduct and Business Ethics (referred as "Code") applies to all Relevant Persons and any third party who works in a representative capacity.
- The Company's Employees who are seconded to other entities will follow the Code of Conduct and Business Ethics of the respective entity, if any, and will ensure best representation of the Company's image at all times. Employees who are seconded to the Company will follow this Code.



# CODE OF CONDUCT AND BUSINESS ETHICS

## INTRODUCTION

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Many Corporations have moved away from the traditional view that business has one and only one responsibility “to increase its profits”. They realize now that business has four responsibilities (Economic, Legal, Ethical and Social).

In fact, failure of any firm at meeting one of these responsibilities results in escalating this failure to the higher social responsibility level and leads eventually to incurring economic losses.

This Code of Business Conduct (CBC) shall apply to all Relevant Persons (including AD Ports ’s Chairman, Board of Directors, Senior Management, cluster board members, and Employees of AD Ports) and any third party who works in a representative capacity. However, in the below sections of this CBC, references are made only to Employees where it is only applicable to be followed by AD Ports’ full-time and part-time Employees including Senior Management, as well as any other person that has been issued an AD Ports Employee ID number, (including but not limited to temporary agency staff, interns and/or trainees):

- Equal Employment Opportunity;
- Internal Communication;
- Personnel Management Policy;
- HSE And Risk Management Responsibility;
- Occupational Safety Systems;
- Employee Privacy;
- Illegal Drugs And Alcohol; And
- Personal Behavior And Appearance.



# CODE OF CONDUCT AND BUSINESS ETHICS

## GROUP CORPORATE VALUES

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### Ready to Respond

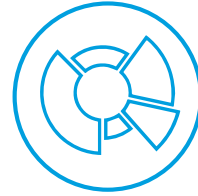
We will Always be Ready and Willing to Respond to Meet Our Customers' Needs and Stakeholders Requirements



### Eager to Collaborate

We Shall Collaborate with All Internal and External Stakeholders to get the Work Done for the Benefit of our Customers and Partners.

Stakeholders: we mean Customers anyone who have influence & impact on our business, e.g. (Employee, shareholders, Society, Gov. Entities, internal Units, Partners...etc.)



### Safe, Secure & Sustainable

We are Committed to Maintain a Safe, Secure and Sustainable Business.



### Innovative for Excellence

We Encourage and Nurture Innovations and care to Engage Employees, Suppliers, Customers and other Stakeholders on our Journey for Excellence.



### Fair and Committed

We Will Always be Fair & Committed to our Employees, Customers and other Stakeholders.



# CODE OF CONDUCT AND BUSINESS ETHICS

## THE CODE

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AD Ports' CBC reaffirms the Company commitment to high standards of ethical conduct and reinforces its business ethics, policies, and procedures. AD Ports' Board of Directors and Senior Management strongly support the CBC and its principles. Each Relevant Person is expected to read, understand, and comply with the Code.

AD Ports' Senior Management is charged by the Board of Directors with ensuring that this CBC and the Company's corporate policies govern, without exception, all business activities of the Company.

In addition to complying with the requirements contained in the corporate policies, in a specific situation, before taking any action each Relevant Person shall consider the following questions and unless the answer to each question is "yes," the action must not be taken:

- *Is this action legal and ethical?*
- *Does it follow Company policy?*
- *Does it comply with both the spirit and the letter of this CBC?*
- *Is it clear that the Company would not be embarrassed or compromised if this action were to become known outside the Company?*



# CODE OF CONDUCT AND BUSINESS ETHICS

## CUSTODIAN AND GUIDING PRINCIPLES

### CUSTODIANSHIP AND USE OF THE CODE

- AD Ports Risk & Compliance shall oversee overall compliance with the CBC and will administer the compliance program in coordination with Human Capital and Emiratization (HC&E) Division.
- All AD Ports Relevant Person (including direct hire, contracted and temporary staff) are required to comply with the Company's policies. Questions about the CBC and reporting on any violation of the CBC can be raised with the Employee's Immediate Manager, Supervisor or Head of Department / Division, HC&E Division or Risk & Compliance Division ("Administrators of Code").
- The matter will be investigated by the relevant Division to the extent that sufficient information is received to conduct such Investigation. All reports will be treated confidentially. It is imperative that reporting Relevant Person do not conduct their own preliminary Investigations. Such actions could compromise the integrity of an Investigation and adversely affect AD Ports and others.

### GUIDING PRINCIPLES

- Relevant Person may occasionally encounter ethical dilemmas due to the ever-changing complexity of AD Ports' business and social environment.
- While it is imperative that AD Ports operates within the parameters of Federal & Local laws and regulations, it is equally important that the Company recognizes that some activities, though perfectly legal, may stretch the boundaries of ethical behavior. That is why in the Company, the guiding principle is to do what is right, not simply what is legally permissible. Relevant Person are encouraged to discuss ethics and conduct related issues with the Administrators of Code.
- Training and communication are key components of AD Ports' Ethical Program. Ongoing training and communication efforts enable Relevant Person to understand the Company's expectations regarding ethical behavior. On a regular basis, AD Ports must discuss key points of the CBC with Relevant Persons. This helps them to understand the importance AD Ports place on good business conduct and the reporting of possible conduct related matters and Concerns regarding compliance with the Code. On an ongoing basis, new Relevant Person must receive similar training during orientation.





# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 1 - SOCIAL RESPONSIBILITY

### SOCIAL RESPONSIBILITY

- For AD Ports, social responsibility is part of the Company's broader mission. It is about being the kind of progressive company that makes a positive difference in the communities where it carries out its operations. It is an integral part of managing business well shown in the model of "Social Responsibility Development" highlighted in the Introduction.
- As part of that policy, AD Ports participates in many social programs and contributes significantly to governmental and non-governmental companies, mainly those taking care of disabled children. Moreover, it contributes to charity organizations that are in charge of taking care of the needy. AD Ports Management encourages Relevant Person to participate in such humanitarian activities and community activities that enhance the reputation of the Company.





# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 2 - ACCOUNTING AND ANTI-CORRUPTION CONTROLS

### ACCOUNTING AND ANTI-CORRUPTION CONTROLS

- Accounting standards require that all transactions and dispositions of AD Ports' assets, revenues and expenses must be properly recorded in the books of accounts of the Company, and that the Company establish and maintain a system of internal accounting controls sufficient to provide reasonable assurance that transactions are properly executed and recorded. The financial system executives should submit to the management on periodical basis detailed and accurate accounting reports.
- Furthermore, AD Ports maintains and disseminates a clear Anti-Bribery and Anti-corruption policy prohibiting the payment, solicitation, and receipt of bribes in any form. All Relevant Person are to comply with the Company's policy; non-compliance can result in dismissal according to the AD Ports Disciplinary Code.
- In line with this policy, no contract, agreement, arrangement, payment, gift, or entertainment, domestic or foreign, shall be offered, promised, agreed, paid, or received that would violate any applicable law and regulation of the UAE or the company.





# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 2 - ACCOUNTING AND ANTI-CORRUPTION CONTROLS

### GIFTS AND ENTERTAINMENT

Under no circumstances should any gift or entertainment ever be offered, given, provided, or accepted by any AD Ports Relevant Person, immediate family member of Relevant Person or agent unless such gift or entertainment:

- ✓ Falls in the category of Exempt Gifts described below;
- ✓ Is consistent with customary business promotion practices;
- ✓ Is not a cash gift;
- ✓ Is not excessive in value (less than AED 500 per year);
- ✓ Cannot be construed as a bribe or payoff;
- ✓ Does not violate applicable laws or regulations; and
- ✓ Does not represent an unusual discount given in an arm's length transaction.

Unless the giving, providing or receiving of the gift or entertainment falls within the definition of Exempt Gifts and Entertainment mentioned below, or is otherwise exempt under the Code of Business Conduct and Ethics, all Relevant Person shall request approval of CRCO for value exceeding AED 500 and describing the proposed gift or entertainment, including its purpose, signed by the recipient/ provider.

### EXEMPT GIFTS AND ENTERTAINMENT

The following gifts and entertainment shall be exempt from the requirements stipulated in the above paragraphs:

- *Business courtesy entertainment provided to others. Entertainment, including meals, that is infrequent (in respect of the same recipient). Arises out the usual course of business, involves a reasonable expense, does not obligate the recipient in any manner and is reasonable and appropriate for the individuals involved and the business at hand. Ordinarily, such entertainment would be given the context of conducting business discussions or advancing business relationships, and technology transfer e.g. conferences, seminars, presentations, workshops, lectures, site visits, business (breakfast, lunch, dinner) etc.*
- *Gifts to a domestic government official which are clearly promotional in nature, marked with a Company logo or other Company identification and made generally available by the Company as business gifts. The provision of gifts and entertainment to government official is often constrained or prohibited by applicable laws and regulations. Therefore, it is essential to consult and comply with all applicable laws and regulations.*
- *Gifts given to service providers, contractors, suppliers and VIP AD Ports visitors as to the presentation and acceptance, which are lawful and a normal business practice, provided the gift itself is reasonable and appropriate for the individuals involved and the business at hand and is of nominal value.*



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 2 - ACCOUNTING AND ANTI-CORRUPTION CONTROLS

### PROHIBITED GIFTS

Corporate Policies prohibit the offering or providing of anything of value, under any circumstances, to a domestic or foreign government, official or Relevant Person, unless expressly permitted under such corporate policies.

Any Relevant Person asked to make or accept a payment, gift, or business gratuity in violation of this CBC must report the matter immediately to CRCO.

### EXEMPT GIFTS AND ENTERTAINMENT

The following gifts and entertainment shall be exempt from the requirements stipulated in the above paragraphs:

- *Business courtesy entertainment provided to others. Entertainment, including meals, that is infrequent (in respect of the same recipient). Arises out the usual course of business, involves a reasonable expense, does not obligate the recipient in any manner and is reasonable and appropriate for the individuals involved and the business at hand. Ordinarily, such entertainment would be given the context of conducting business discussions or advancing business relationships, and technology transfer e.g. conferences, seminars, presentations, workshops, lectures, site visits, business (breakfast, lunch, dinner) etc.*
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- *Gifts given to service providers, contractors, suppliers and VIP AD Ports visitors as to the presentation and acceptance, which are lawful and a normal business practice, provided the gift itself is reasonable and appropriate for the individuals involved and the business at hand and is of nominal value.*



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 2 - ACCOUNTING AND ANTI-CORRUPTION CONTROLS

### PROTECTION OF AD PORTS PROPERTY & ASSETS

- Each Relevant Person should ensure that the Company's property, assets, and information are used only for Company business purposes. The Company's assets, such as office equipment, software, stationery, production equipment and products, must not be used for personal benefits, except as may be specifically authorized by corporate policies. These assets shall not be taken out of Company facilities unless necessary and authorized in connection with Company work.
- Incidental or occasional use of Company office equipment, such as telephones, computers, software, stationery or copy machine is permitted. However, excessive use of such equipment or material is not permitted and may result in Disciplinary Action.
- The Company's assets also include confidential and proprietary information relating to the present or planned business activities or assets of the Company that have not been released publicly by the company. Confidential information includes, for example, pricing, financial data, industrial secrets and know-how, marketing and sales programs, research and development information and customer and supplier information.
- The Company's assets also include confidential and proprietary information relating to the present or planned business activities or assets of the Company that have not been released publicly by the company. Confidential information includes, for example, pricing, financial data, industrial secrets and know-how, marketing and sales programs, research and development information and customer and supplier information.
- No Relevant Person shall disclose the Company's confidential or proprietary information to anyone within or outside the Company unless the recipient legitimately needs the information to carry on his assigned responsibilities as an Employee with the Company, or is an outsider who has been properly authorized by management to receive such information.



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 3 - CONFLICT OF INTEREST

### CONFLICT OF INTEREST

A Conflict of Interest arises when a Relevant Person's personal activities or financial interests may influence or appear to influence his ability to act in the best interests of the Company. To avoid this, the following rules shall be followed:

#### 1- RELEVANT PERSON ACTIVITIES

- A Relevant Person shall not participate in any activities that could conflict with his/her responsibilities with the Company;
- AD Ports Relevant Person shall not discuss or enter into any agreement(s) or understanding(s) with any competitor(s) of the Company concerning the Company's prices, product specifications or markets;
- A Relevant Person shall not do any business /commercial activities with the Company;
- A Relevant Person is not allowed to enter or deal with any agreement, which results in a Conflict of Interest with the Company;





# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 3 - CONFLICT OF INTEREST

### 2 - RELEVANT PERSON ACTIVITIES

- A Relevant Person shall take necessary care and caution in dealing with others, where such deals may influence his work in the Company especially taking of gifts, presents, money, payment, loans, or entertainment etc.; and
- A Relevant Person who is subjected to such influence shall report the matter to his concerned CRCO for necessary action. No Relevant Person will, for personal or another person's gain, deprive the Company of any opportunity or benefit that could be construed as related to any existing or reasonably anticipated future activity of the company including and without limitation to:
  - ✓ *Taking personal gain opportunities that are discovered through the use of the Company's property;*
  - ✓ *Using the Company's property information or position for personal gain; and*
  - ✓ *Competing with the Company.*

### 3 - DEALING WITH FAMILY MEMBERS

- A Relevant Person must not knowingly conduct business on behalf of the Company with family members (spouse, parents, children, siblings, and in-laws) or a company with which any family member is associated unless specific written approval has been granted in advance by AD Ports Management.
- Any Relevant Person, who conducts business on behalf of the company with any family member, shall apply in writing to the company to gain the required approval.

### 4 - DEALING WITH CONTRACTORS, CONSULTANTS & REPRESENTATIVES

AD Ports Relevant Person may be approached by a third party offering to deliver projects, send the Company orders or otherwise represent the Company in various capacities. Frequently the third party will claim a special relationship or position relative to the matter under consideration and will press for an immediate response or agreement. When solicited by a third party, Relevant Person shall follow the following procedures:

- ✓ *Make no commitment (oral or written) of any kind. Tell the third party at the outset that there can be no agreement with the Company until both parties have executed a written agreement;*
- ✓ *Suggest that the third party put the inquiry in writing addressed to the GCEO or concerned person;*
- ✓ *Do not send the third party any corporate literature until after a written agreement is executed;*
- ✓ *If the third party is unwilling to identify the project unless the Company makes a commitment, the conversation shall be politely, but firmly, terminated;*
- ✓ *Discuss with his or her Immediate Manager the advisability of documenting the conversation with the third party in a timely letter to such party, as such a letter become an important legal document;*
- ✓ *There shall be no secret written or unwritten side contracts, agreements, or arrangements;*
- ✓ *In this respect, all contracts, agreements, or arrangements must be assigned prior to execution to concerned staff in accordance with the company procedures; and*
- ✓ *Each Relevant Person shall become aware of the laws, regulations, policies and customs applicable to his/her activities on behalf of AD Ports, and if a question, potential conflict or violation arises, he/she shall report the matter to the CRCO.*



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 4 – AD PORTS BUSINESS ETHICS

### AD PORTS BUSINESS ETHICS

AD Ports Business Ethics are an integral part of the company's Mission, Vision and Values. High business ethics and integrity ensure AD Ports credibility. Relevant Person shall conform to the relevant laws and regulations of Abu Dhabi and United Arab Emirates and fulfill their obligations in all aspects of their business principles guiding its parent company.

AD Ports expects all those who do business with the company to follow the ethical and legal standards set forth in this CBC. Relevant Person, consultants and representatives must respect the law and policies of federal and local government establishments or the agencies with which the Company does business.

AD Ports expects all its Relevant Person to uphold the highest standards of ethical behavior and integrity. The Company believes that ethical and economic values are interdependent and that the business community must always strive to operate within the accepted norms established by national authorities.

AD Ports CBC should influence the Relevant Person to:

- Assure strict adherence to local and federal laws and regulations as well as to AD Ports ethical standards;
- Ensure all AD Ports business transactions are fully and fairly recorded according to the Company's accounting principles;
- Ensure continuous training and awareness for Relevant Person reporting to them on how to handle ethical issues, as well as provide timely advice and guidance; and
- Regularly monitor ethical conduct and ensure that accessible systems are in place for Relevant Person and others to report potential violations.





# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 4 – AD PORTS BUSINESS ETHICS

### 1 - EQUAL EMPLOYMENT OPPORTUNITY

- The Company is committed to provide equal employment opportunities and a workplace free from prohibited workplace harassment and discrimination. The diversity of the Company's Employees represents a tremendous asset. Hence, AD Ports is firmly committed to providing equal opportunity in all aspects of employment without regards to race, color, religion, ethnicity, gender, or national origin.
- Equal employment practices are integral to the Company's daily activities and extend to all aspects of employment, including, without limitation, recruitment and hiring, compensation, promotion and demotion, transfer, training and development, termination, layoff discipline, work assignment, and all Company-sponsored social and recreational activities. Notwithstanding the above, the Company provides special incentives, fast track promotions, benefits, and training to meet the national plan of Emiratization.

### 2 - WORKING RELATIONS AND ETHICS

Building trust-based relationships and good communication is the key-concept, which should entail all working relations at AD Ports. Also, the Company adopts and encourages practices favoring transparency and honesty not only in Manager/ subordinate relationships, but also among the Company and its Relevant Person.

For AD Ports, trust is more than a word, it is an ethical principle associated to its institutional image and linked to its history and mission. Such perennial commitment assumes solid and reliable relationships with AD Ports Employees because they are the ones helping to consolidate the Company in the country. To build, in practice, relationships marked by soundness, respect and ethics, AD Ports has developed some tools:

- ✓ *Fast and effective internal communications;*
- ✓ *Modern Personnel Management Policy; and*
- ✓ *Mission, Vision, and Values Statements.*



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 4 – AD PORTS BUSINESS ETHICS

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### 3 - INTERNAL COMMUNICATION

AD Ports believes that effective, flexible, and consistent internal communication helps to build trust within the company and requires that Employees are accurately informed about all situations that may affect their lives within the Company.

AD Ports therefore supports an intranet accessible by all Employees, an internal newsletter and e-mail for fast and efficient communication. For AD Ports communication and transparency forms the basis for a sound relationship with its Employees.

### 4 - PERSONNEL MANAGEMENT POLICY

The trust relationship is not immune to failures in personnel management services is as important as to communicate with the Employees and encourage them to manage their own time and have duly represented in their interest such as:

- ✓ *Vacations;*
- ✓ *Overtime;*
- ✓ *Payment systems; and*
- ✓ *Personnel recruiting and hiring system (Direct hire, contractor, or temporary Employees).*

### 5 - DIGNITY & MUTUAL RESPECT

Every Relevant Person will be educated about AD Ports Vision, Mission and Values and is expected to conduct business with other Relevant Person, partners, contractors, suppliers, vendors and customers with respect, integrity, open communication, and excellence.

At AD Ports, individuals treat others as they expected to be treated themselves. The Company believes in respect for the rights of all individuals and is committed to promoting an environment characterized by dignity and mutual respect. Because AD Ports takes its responsibilities to its fellow citizens seriously, it acts decisively to ensure that all those with whom it does business understand its policies and standards.

Providing clearly written guidelines reinforces AD Ports principles and business ethics. Relevant Person at all levels are expected to be active proponents of AD Ports CBC and are trained to report without retribution anything they observe or discover that indicates the Company's standards are not being met.



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 4 – AD PORTS BUSINESS ETHICS

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### 6 - VIOLATIONS OF THE CODE

- The CBC is guideline for Relevant Person to follow in the conduct of the Company's business. Following the Code should ensure that no applicable rules or regulations are broken. Violation of the Company's rules and regulations, policies and procedures may carry penalties up to and including dismissal.
- Compliance with the law and ethical standards are conditions of employment, and serious violations may result in Disciplinary Action or termination. All Relevant Person shall be asked to sign a statement indicating that they have read, understood, assimilated, and will comply with AD Ports CBC, and Relevant Person shall be periodically asked to reaffirm their commitment to these principles.
- Each Relevant Person shall become aware of the laws, regulations, policies and customs applicable to his/her activities on behalf of AD Ports, and if a question, potential conflict or violation arises, he/she shall seek guidance from, or report the matter to CRCO.



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 5 – ANSWERING INQUIRIES

### ANSWERING INQUIRIES

Inquiries from the press and other media or the public regarding AD Ports are to be answered only by the Marketing and Communications Division, upon approval of the Company Management.

Information is considered “non-public” unless it has been adequately disclosed to the public, either through AD Ports pre-approved press releases or through its internal magazine, and there has been sufficient time and opportunity for the concerned parties as a whole to assimilate the information.

The obligation not to disclose the company’s confidential or proprietary information continues after employment with the company terminates.





# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 6 – HEALTH, SAFETY AND ENVIRONMENT

### HEALTH, SAFETY AND ENVIRONMENT

AD Ports is committed to provide a safe and healthy workplace and has an on-going responsibility for maintaining and improving workplace health, safety and environmental performance, in order to safeguard personnel, environment, assets, and reputation as well as the surrounding community from OHS risks & environmental impacts.

As HSE is everyone's responsibility and in order to maintain and enhance the HSE aspects in AD Ports and promote safe behavior, all employees are urged to:

- Actively participate with management in the implementation of AD Ports HSE MS.
- Understanding and acceptance of individual HSE roles, responsibilities and accountabilities by being familiarized with his/her Job Description and to act through.
- Work within the framework of his/ her Organization Structure and conduct work in accordance to relevant HSE requirements.
- Comply with established and relevant AD Ports HSE procedures, Safe Operation Procedures, Work Instruction.
- Participate actively to achieve health & safety and environmental objectives.
- Active participation in identifying and eliminating hazards, environmental aspects and managing actual or potential HSE risks.
- Report HSE Observation (unsafe act, unsafe condition), near misses and land & marine incidents.
- Provide reliable information to Management and participate in HSE counseling and communication.
- Promoting continual improvement by participating in HSE audit, inspection, site visits and risk assessment.
- Enhance his/her HSE competency through ongoing training and awareness.
- Disallow the Consumption and/or Distribution of alcoholic beverages and/or any other illegal substance during working hours and during business-related missions/assignments, under no circumstances should an Employee work under the influence of alcohol.



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 6 – HSE AND RISK MANAGEMENT RESPONSIBILITY

### 1 - WORKPLACE HARASSMENT

Workplace harassment based on an individual's race, color, religion, ethnicity, gender, national origin, disability, age, creed, citizenship status, sexual, emotional, harassment or any other legally protected status that is made an explicit or implicit term or condition of an individual's employment, or unreasonably interferes with job performance or creates and intimidating, hostile or offensive working environment is an unwelcome or unwanted conduct which may subject the violator to Disciplinary Action.

Any Relevant Person who believes that he/she has been a victim of prohibited workplace harassment should, if the Relevant Person is comfortable doing so, inform the offender that he/she finds the behavior inappropriate and should be stopped. Relevant Person asked to stop such conduct should respect the request and stop. If a Relevant Person is not comfortable talking to the offender, such Relevant Person should report any workplace harassment to the Human Capital & Emiratization (HC&E)/ Chief Risk & Compliance Officer(as applicable) for necessary action.

The HC&E / CRCO will promptly conduct an Investigation with sensitivity to preserve confidentiality and to practicably admissible extent. All Relevant Person are expected to cooperate in such Investigations.

The Company will not tolerate threats or acts of retaliation against Relevant Person for using the complaint channels or cooperating in an Investigation. Relevant Person who are found to have engaged in conduct in violation of Company policies, or to have misused their positions of authority in this regard, or to be uncooperative during an Investigation, or to have made a knowingly false complaint, or to have retaliated against someone for reporting or providing information about a claim, shall be subject to severe disciplinary measures.

### 2 - EMPLOYEE PRIVACY

AD Ports acknowledges privacy protection of Employees as part of the ethical values that need to be respected. Employees are required to preserve each other's privacy by not interfering or impeaching another's privacy by any means and to keep separate personal/private affairs from the work environment.

### 3 - PERSONAL BEHAVIOR & APPEARANCE

AD Ports Employees need to adhere to the ethics and standards contained in this Code on both work and personal level. AD Ports is committed to maintaining the highest possible professional image and expects Employees to dress in formal manner and maintain a neat and clear appearance at all times. Work attire must project a professional appearance that reflects AD Ports standard of professionalism. Employee relationships which may impinge on their duties and responsibilities should be avoided.



# CODE OF CONDUCT AND BUSINESS ETHICS

## ELEMENT 6 – HSE AND RISK MANAGEMENT RESPONSIBILITY

### 4 - WORKPLACE VIOLENCE

AD Ports does not tolerate violence of any kind in the workplace. The Company expects Employees to resolve their differences through discussion and if necessary, through the assistance of the HC&E Division or Risk & Compliance Division (as applicable).

Any Employee who has been threatened with, or subjected to, physical emotional assault by a fellow Employee should report it immediately.

### 5 - ILLEGAL DRUGS AND ALCOHOL

AD Ports expects Employees to report to work in a good condition to perform their duties, free from the influence of illegal drugs or alcohol. Reporting to work under the influence of any illegal drug or alcohol, or using possessing or selling illegal drugs or alcohol while on the job should be promptly reported to the concerned authority and apply the punishment as provided by AD Ports “Disciplinary Code”.





# CODE OF CONDUCT AND BUSINESS ETHICS

## ADMINISTRATION OF THE CODE

### REPORTING OF VIOLATIONS AND CONCERNS UNDER THE CODE

Relevant Persons should promptly report any suspected or potential wrongdoing that the Relevant Person reasonably believe has taken place, is taking place or will take place.

There are several channels through which you may report a matter under this Code. When deciding which channel to use, consideration should be given to the nature of the Concern, the individuals involved, and the Stakeholder's comfort level. If reasonable grounds exist, promptly report the information through the appropriate channel, as listed below, however, ensure that, only those who need to know are informed; do not alert people who may possibly be involved; and ensure that any notes and other evidence is handled carefully and kept secure.

The reporting channels are as follows:

- The Employee's Immediate Manager or Supervisor; or
- The Employee's Head of Department; or
- Call the Fraud Hotline: 00971 2 695 2999; or
- E-mail the Fraud Hotline: [fraud@adports.ae](mailto:fraud@adports.ae); or
- The HC&E Division; or
- The Risk & Compliance Division; or
- Third-party independent hotline (if available).
- AD Ports' website will include a link, or contact details, for the fraud hotline, for Employees to access easily.

All raised enquiries will be answered within a reasonable timeframe. As for allegations of violation, the CHC&E Department and Compliance Department (as applicable) will ensure that proper Investigations take place to address and resolve the matter(s), as necessary, in liaison with the concerned parties, in a timely and discreet manner; and

The HC&E / R&C Divisions shall take every reasonable effort to preserve the reporting Relevant Persons anonymity. That said this may not be possible in all circumstance, for example if an Investigation leads to criminal prosecution or other legal proceedings.

Please refer to AD Ports Whistleblowing Policy for more details on reporting a Concern.

CRCO shall have access to Audit & Risk Committee (ARC) and Board to report on significant matters relating to the violations and / or Concerns under this Code.





**THANK YOU**

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