



# Business Partner Code of Conduct

## PURPOSE

AD Ports Group is committed to upholding high levels of ethics, integrity, and sustainability. The Group places great importance on delivering responsible solutions to our stakeholders, and thus, conducts its business with the utmost integrity, aligning with the ethical standards as outlined in our Employee Conduct and Business Ethics Policy and AD Ports Group's Code of Conduct and Business Ethics.

Responsible sourcing is a key component in realising this vision. Our commitment to responsible and ethical business practices relies not only on our own personnel, but also on establishing relationships with **Business Partners** (BPs) who share our values.

The Group's **Business Partner Code of Conduct** (BPCC) outlines the principles, requirements, and expectations for ethical and responsible behaviour from BPs. This includes vendors, suppliers, contractors, counterparties, distributors, and other third parties engaged in business with the Group, or any of its related clusters or subsidiaries. This also extends to the BP's own first-tier suppliers, contractors, and other BPs involved in the provision of products, components, materials, or services to the Group.

## SCOPE

Our BPCC delineates the minimum requirements that our BPs must adhere to while conducting business with the Group as well as during their business interactions with their own employees, third parties and other stakeholders. It is expected that by engaging in business with the Group, BPs have read, understand, and agreed to comply with this BPCC and to align with the Group's relevant policies and procedures.

Stakeholders are playing vital role in ensuring that business interactions are appropriately assessed, managed, and monitored in line with the applicable rules, regulations, and standards.

## BUSINESS PARTNERS ENGAGEMENT

Safeguarding the Group and its BPs from potential legal, financial, operational, and reputational risks that may arise from engagements is very crucial while maintaining compliance with global regulations, such as, International Trade and Sanctions, Anti-Money Laundering (AML), Anti-Bribery and Corruption (ABAC), data protection and data privacy laws, and Environmental, Social, and Governance (ESG) standards, and any other regulatory requirements that may apply. By implementing and adhering to this BPCC, we:

- Ensure regulatory compliance
- Promote ethical practices
- Enhance risk management
- Foster transparency and accountability
- Support strategic growth

We expect BPs to comply with all applicable laws, regulations, and standards in the countries where they operate or conduct business. In case a requirement of this BPCC conflicts with any applicable law or regulation, the law and regulation shall prevail. Where there are any differences between the Group's standards and any legal requirements, the stricter standard shall apply.

BPs are also expected to comply with the highest ethical and operational standards to protect the reputation of the Group where BPs must be transparent about their operations, so that the Group can understand and manage any supply chain risks. Consequently, BPs should effectively manage any agents, representatives, and sub-contractors appointed, and ensure their full compliance with this BPCC.

We may update this BPCC periodically and it is the responsibility of our BPs to ensure that they read, understand, and comply with the most up to date version as provided by us. [CLICK HERE](#) to download a copy of our Business Partner Code of Conduct.

Mohamed Juma Al Shamisi  
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