

# CODE OF CONDUCT AND BUSINESS ETHICS





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مجموعة موانئ أبوظبي  
**AD PORTS GROUP**



## MESSAGE FROM THE GCEO

Integrity and professionalism are the vital foundations of every business relationship. That is why at Abu Dhabi Ports Company PJSC (AD Ports Group) those traits are at the heart of everything we do. Maintaining the highest standards of conduct and ethical behaviour is fundamentally intertwined with our business goals and customer service offering and remains a key part of our strategic objectives. It is the responsibility of us all to demonstrate our commitment to this Code of Conduct and Business Ethics in every aspect of our work.

We aim to cultivate an environment of pride and support at AD Ports Group where every relevant person, or third party who works in a representative capacity, understands that their daily actions must be guided by a strong sense of integrity, mutual respect, accountability, transparency and excellence. AD Ports Group is committed to setting and maintaining high standards of governance both internally and externally and follows very stringent standards when applying its' policies, procedures, codes, and better practice guidelines in conjunction with the law.

Our Code of Conduct and Business Ethics is a reflection of our mission, vision and values. It represents our expectations for all interactions and business practices and underlines how to put our values into action. It also identifies supporting resources to help maintain compliance and how to protect the company and its stakeholders from ethical breaches.

All relevant persons will be provided with a copy of the Code of Business Conduct, published in both Arabic and English, and must confirm receipt and understanding of the document. It should also be recommended to any third party that does business with AD Ports Group. Together we must all agree to dedicate ourselves to maintaining the highest standards of ethical behaviour that reflect the integrity and values of AD Ports Group and allow us to retain trusted relationships with all stakeholders and customers.



**Captain Mohamed Juma Al Shamisi**  
**Managing Director and**  
**Group CEO of AD Ports Group**



## THE PURPOSE

The Code of Conduct and Business Ethics outlines 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

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





# INTRODUCTION

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

Failure to live up to these responsibilities can have dire consequences, including damaging economic losses.

This CCBE shall apply to all relevant persons (including AD Ports Group’ Chairman, Board of Directors, Senior Management, cluster board members, and employees of AD Ports Group) and any third party who works in a representative capacity. However, in the following sections of this CCBE, references made to employees, only apply to AD Ports Group full-time and part-time employees including Senior Management, as well as any other person that has been issued an AD Ports Group 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
- Personal Behavior and Appearance





# GROUP CORPORATE VALUES



## Ready to Respond

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We will ensure our continued readiness to respond to the needs and requirements of our customers and stakeholders at all times.



## Eager to Collaborate

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We will collaborate with all internal and external stakeholders to get the work done for the benefit of our customers and partners.

Stakeholders: is anyone who has influence & impact on our business, e.g. (customers, employees, shareholders, society, Government entities, internal units, partners... etc.).



## Safe, Secure & Sustainable

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We will commit to maintaining a safe, secure and sustainable business.



## Innovative for Excellence

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We will consistently encourage and nurture innovation and engage our employees, suppliers, stakeholders and customers to create an experience of excellence .



## Fair and Committed

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We will prioritize transparency, fairness and commitment in all of our dealings with employees, customers and stakeholders.





The AD Ports Group CCBE reaffirms the company's commitment to high standards of ethical conduct across its policies, and procedures.

AD Ports Group Board of Directors and Senior Management strongly support the CCBE and its principles. Each relevant person is expected to read, understand, and comply with the Code.

AD Ports Group Senior Management is charged by the Board of Directors with ensuring that this CCBE 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, before taking any action in a specific situation 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 CCBE?
- Is it clear that the Company would not be embarrassed or compromised if this action were to become known outside the Company?







# CUSTODIAN AND GUIDING PRINCIPLES

## CUSTODIANSHIP AND USE OF THE CODE

- AD Ports Group Risk & Compliance shall oversee overall compliance with the CCBE and will administer the compliance program in coordination with Human Capital and Emiratization (HC&E) Division.
- All relevant persons (including direct-hire, contracted and temporary staff) are required to comply with the company's policies. Questions about the CCBE and reporting on any violation of the CCBE can be raised with the relevant person'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 when required. All reports will be treated confidentially. It is imperative that reporting persons do not conduct their own preliminary investigations. Such actions could compromise the integrity of an investigation and adversely affect AD Ports Group and others.

## GUIDING PRINCIPLES

- A relevant person may occasionally encounter ethical dilemmas due to the ever-changing complexity of AD Ports Group business and social environment.
- While it is imperative that AD Ports Group 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 behaviour. That is why, in the company, the guiding principle is to do what is right, not simply what is legally permissible. Relevant persons are encouraged to discuss ethics and conduct related questions with the Administrators of Code.
- Training and communication are key components of AD Ports Group Ethical Program. Ongoing training and communication efforts enable employees to understand the company's expectations regarding ethical behaviour. On a regular basis, AD Ports Group must discuss key points of the CCBE with relevant persons. This ensures they understand the importance of good business conduct to the company and how to make queries or reports about conduct related matters. This training is essential during orientation for any new relevant person.





## ELEMENT 1

# SOCIAL RESPONSIBILITY

For AD Ports Group, 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 also an integral part of the Social Responsibility Development model, highlighted in the introduction.

As part of that policy, AD Ports Group 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 support those in need. AD Ports Group management encourages all employees to participate in beneficial humanitarian and community activities that are in line with the company's social objectives.





## ELEMENT 2

# ACCOUNTING AND ANTI-CORRUPTION CONTROLS

Accounting standards require that all transactions and dispositions of AD Ports Group assets, revenues and expenses must be properly recorded in the 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 a periodical basis detailed and accurate accounting reports.

Furthermore, AD Ports Group maintains and disseminates a clear anti-bribery and anti-corruption policy prohibiting the payment, solicitation, and receipt of bribes in any form. All relevant persons are to comply with the company's policy; non-compliance can result in dismissal according to the AD Ports Group 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.







## 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 Group relevant person, immediate family member of relevant person or agent unless such gift or entertainment:

- Falls in the category of 'Exempt Gifts'
- Is consistent with customary business promotion practices
- Is not a cash gift
- Is not excessive in value (more than AED 500 per year)
- Cannot be construed as a bribe or payoff
- Does not violate applicable laws or regulations
- Does not represent a disproportional discount

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 Conduct and Business Ethics, all relevant persons shall request approval of CRCO for values exceeding AED 500 and describing the proposed gift or entertainment, including its purpose, signed by the recipient/ provider.







## 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 CCBE 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 and arises out of 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, i.e. 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 officials 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 Group visitors which are lawful and normal business practice, provided the gift itself is reasonable, appropriate for the individuals involved, and is of nominal value.





## ELEMENT 2

# ACCOUNTING AND ANTI-CORRUPTION CONTROLS

### PROTECTION OF AD PORTS GROUP PROPERTY & ASSETS

Each relevant person should ensure that the company's property, assets, and information are used only for company purposes. The company's assets, such as office equipment, software, stationery, production equipment and products, must not be used for personal benefits, except when 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.

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 assigned responsibilities as an employee with the company or is an outsider who has been properly authorized by management to receive such information.





## ELEMENT 3

# 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
- A 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 into or deal with any agreement, which results in a conflict of interest with the company





## 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 their work in the company especially taking of gifts, presents, money, payment, loans, or entertainment etc.

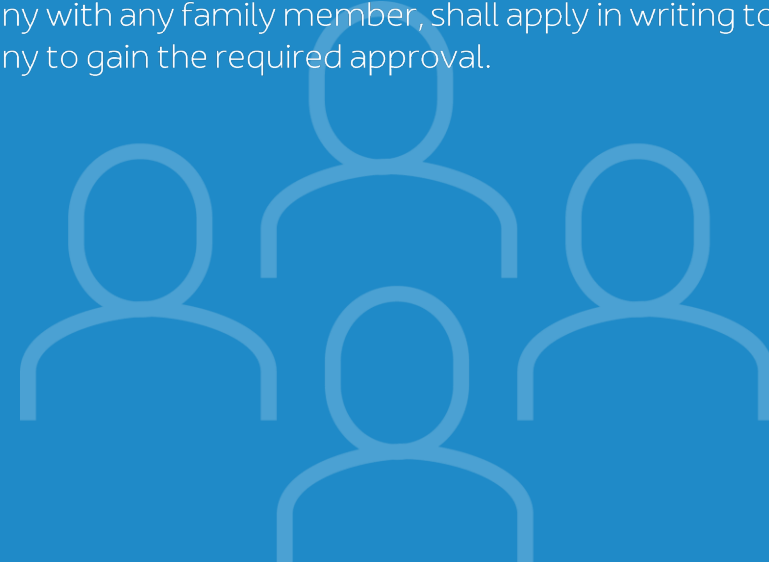
A relevant person who is subjected to such influence shall report the matter to their concerned CRCO for necessary action. No relevant person will, for personal or another person's gain, deprive the company of any opportunity or benefit that could be construed as related to any existing or reasonably 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 proprietary information or position for personal gain
- 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 Group 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.







## ELEMENT 3

# CONFLICT OF INTEREST

### 4 DEALING WITH CONTRACTORS, CONSULTANTS & REPRESENTATIVES

AD Ports Group relevant persons 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 persons 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
- Each relevant person shall become aware of the laws, regulations, policies and customs applicable to his/her activities on behalf of AD Ports Group, and if a question, potential conflict or violation arises, he/she shall report the matter to the CRCO.





## ELEMENT 4

# AD PORTS GROUP BUSINESS ETHICS

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

AD Ports Group expects all those who do business with the company to follow the ethical and legal standards set forth in this CCBE. relevant persons, 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 Group expects all its relevant persons to uphold the highest standards of ethical behaviour 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.





## ELEMENT 4

# AD PORTS GROUP BUSINESS ETHICS

### AD PORTS GROUP CCBE SHOULD INFLUENCE THE RELEVANT PERSON TO:

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





## ELEMENT 4

# AD PORTS GROUP BUSINESS ETHICS

## 1 EQUAL EMPLOYMENT OPPORTUNITY

The company is committed to providing 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 Group is firmly committed to providing equal opportunity in all aspects of employment without regard to race, colour, 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 maintaining good communication is essential to all working relations at AD Ports Group. Also, the company adopts and encourages practices favouring transparency and honesty, not only in manager/ subordinate relationships but also among the company and its relevant persons.

For AD Ports Group, trust is more than a word, it is an ethical principle associated with its institutional image and linked to its history and mission. Such perennial commitment fosters solid and reliable relationships with AD Ports Group employees as they are vital components of the company's growth and performance in the country and beyond. To build, in practice, relationships marked by soundness, respect and ethics, AD Ports Group has developed some tools:

- Fast and effective internal communications
- Modern Personnel Management Policy
- Mission, Vision, and Values Statements







## ELEMENT 4

# AD PORTS GROUP BUSINESS ETHICS

### 3 INTERNAL COMMUNICATION

AD Ports Group 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 Group therefore supports an intranet accessible by all employees, an internal newsletter and e-mail for fast and efficient communication. At AD Ports Group effective communication and transparency form 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 which is why it is important to communicate with the employees and encourage them to manage their own time as well ensuring their interests are duly represented in areas such as:

- Vacations
- Overtime
- Payment systems
- Personnel recruiting and hiring system (direct hire, contactor, or temporary employees)





## ELEMENT 4

# AD PORTS GROUP BUSINESS ETHICS

## 5 DIGNITY & MUTUAL RESPECT

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

At AD Ports Group, individuals will 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 Group 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 Group principles and business ethics. relevant persons at all levels are expected to be active proponents of AD Ports Group CCBE and are trained to report without retribution anything they observe or discover that indicates the company's standards are not being met.

## 6 VIOLATIONS OF THE CODE

The CCBE is the guideline for relevant persons 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 persons shall be asked to sign a statement indicating that they have read, understood, and will comply with AD Ports Group CCBE, and relevant persons 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 Group, and if a question, potential conflict or violation arises, he/she shall seek guidance from, or report the matter to CRCO.





## ELEMENT 5

### ANSWERING INQUIRIES

Inquiries from the press and other media, or the public, regarding AD Ports Group 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 Group pre-approved press releases or through its internal magazine, and there has been sufficient time and opportunity for the concerned parties to assimilate the information.

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







## ELEMENT 6

# HEALTH, SAFETY AND ENVIRONMENT

AD Ports Group is committed to providing a safe and healthy workplace and has an ongoing 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 Group and promote safe behaviour, all employees are urged to adhere to the points on the following page:







## ELEMENT 6

# HEALTH, SAFETY AND ENVIRONMENT

- Actively participate with management in the implementation of AD Ports Group HSE MS.
- Understand and accept individual HSE roles, responsibilities and accountabilities by being familiarized with his/her job description and necessary actions required.
- Work within the framework of his/ her organization structure and conduct work in accordance with relevant HSE requirements.
- Comply with established and relevant AD Ports Group HSE procedures, Safe Operation Procedures and Work Instructions.
- Participate actively to achieve health & safety and environmental objectives.
- Actively participate in identifying and eliminating hazards, environmental aspects and managing actual or potential HSE risks.
- Report HSE Observation (unsafe act, unsafe conditions), near misses and land & marine incidents.
- Provide reliable information to management and participate in HSE counselling and communication.
- Promote continual improvement by participating in HSE audit, inspections, site visits and risk assessments.
- Enhance his/her HSE competency through ongoing training and awareness.
- Disallow the consumption and/or distribution of alcoholic beverages and/or any other illegal substances during working hours and during business-related missions/assignments. Under no circumstances should an Employee work under the influence of alcohol.





## ELEMENT 6

# HSE AND RISK MANAGEMENT RESPONSIBILITY

## 1 WORKPLACE HARASSMENT

Workplace harassment based on an individual's race, colour, religion, ethnicity, gender, national origin, disability, age, creed, citizenship status, sexual, emotional 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 an 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 behaviour inappropriate and should be stopped. The relevant person asked to stop such conduct should respect the request and stop immediately. 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 and sensitively conduct an investigation to preserve confidentiality to all practicably admissible extent. All relevant persons are expected to cooperate in such investigations.

The Company will not tolerate threats or acts of retaliation against relevant persons for using the complaint channels or cooperating in an investigation. relevant persons 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 Group 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 personal/private affairs separate from the work environment.





## ELEMENT 6

# HSE AND RISK MANAGEMENT RESPONSIBILITY

### 3 PERSONAL BEHAVIOUR AND APPEARANCE

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

### 4 WORKPLACE VIOLENCE

AD Ports Group 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 or emotional assault by a fellow employee should report it immediately.

### 5 ILLEGAL DRUGS AND ALCOHOL

AD Ports Group 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 who shall apply the punishment as provided by AD Ports Group “Disciplinary Code”.





## ELEMENT 7

# WHISTLE BLOWING PLATFORM – SPEAK OUT

Our goal is to make the business a better place for employees, customers and suppliers. This is a confidential service, which you can access from any location, 24 hours a day, 365 days of the year.

The Whistle Blowing platform, allows you to report fraud, abuse, environmental issues, or incidents that contradict AD Ports Group's Code of Conduct and Business Ethics. In order to assist in the investigation, those reporting potential violations are encouraged to identify themselves; however, anonymous reports will also be accepted and investigated. Please note that this is not a suggestion/feedback platform; it is for reporting purposes only.

ETHIX360 is the host of the Whistle Blowing website. They are an independent, third-party operator and are not part of AD Ports Group.

**[PLEASE CLICK HERE TO ACCESS THE PLATFORM](#)**







# 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 believes 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
- The employee's Head of Department
- Call the Fraud Hotline on 00971 2 695 2999; or e-mail the Fraud Hotline: [fraud@adports.ae](mailto:fraud@adports.ae)
- The HC&E Division
- The Risk & Compliance Division
- Third-party independent hotline (if available)
- AD Ports Group 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.

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

Please refer to AD Ports Group 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.





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AD PORTS GROUP

# Thank you

[adportsgroup.com](http://adportsgroup.com)

