

CODE OF BUSINESS CONDUCT FOR BUSINESS PARTNERS

FEBRUARY 2024


**ADB
SAFEGATE**

Introduction

This Code of Business Conduct establishes the fundamental business behaviours required of ADB SAFEGATE's Business Partners, including but not limited to agents, distributors, suppliers, joint venture partners, consortium partners, subcontractors, etc. It serves as the ethical and legal framework in which we aim to conduct successful operations worldwide.

This document outlines the fundamental principles and regulations that govern our interactions with external parties and the public. It includes legal requirements, international human rights treaties, anti-corruption, and anti-trust laws, as well as sustainability guidelines, which serve to enhance our understanding of legal and moral standards as vital aspects of our entrepreneurial pursuits.

ADB SAFEGATE prides itself on conducting business with the utmost integrity. Our corporate values reflect our commitment to clean and ethical practices.

Compliance function

The ADB SAFEGATE Group has a designated Compliance Officer ("GCO") who serves as the primary point of contact for all compliance-related matters and provides support for Business Partners. The Compliance Officer can be contacted at the following email address:

Compliance@adbsafegate.com.

Basic behavioural requirements

Business Partners are expected to comply with all laws and regulations of the jurisdictions in which they operate. ADB SAFEGATE prohibits unlawful behaviour and retains the right to terminate agreements with Business Partners who violate the law.

Mutual respect, honesty, and integrity

We strive to uphold mutual respect, honesty, and integrity towards every individual, regardless of their ethnic background, culture, religion, age, disability, race, sexual identity, worldview, or gender. We strictly prohibit any kind of discrimination or harassment based on any of these traits, whether it be sexual or otherwise personal in nature.

Our Business Partners, in particular our suppliers, are required to adhere to strict standards regarding labour practices. They may not employ workers under the age of 15, or under the age of 14 in countries that are subject to the developing country exception of the ILO Convention 138.

At ADB SAFEGATE, we are committed to the elimination of forced labour, modern slavery, and human trafficking in any form across our operations. As part of this commitment, we require our Business Partners to adhere to the same high standards of ethical conduct. We expect all our partners to conduct due diligence on their supply chains and take every possible measure to prevent these heinous practices. We strictly prohibit the use of forced labour, modern slavery, or human trafficking by any of our business partners and will take swift action to terminate any relationships with those who engage in such practices. By working together

towards this goal, we can ensure that our operations and those of our Business Partners contribute positively to society and respect the human rights of all individuals.

Responsibility for the reputation of ADB SAFEGATE

The reputation of ADB SAFEGATE depends on the actions and conduct of everyone. Any illegal or inappropriate behaviour from a Business Partner could cause substantial damage to the company's reputation. Therefore, every Business Partner must prioritize maintaining and promoting ADB SAFEGATE's good reputation in their respective countries.

Management, responsibility, and supervision in the organization of the Business Partner

The culture of integrity, ethical conduct, and compliance in every organization begins at the top with management, responsibility, and supervision. Managers must fulfil their obligations for organizing and supervising their area of responsibility, ensuring compliance with internal policies and applicable laws. Although they may delegate specific tasks, managers are ultimately responsible for all employees under their care. Managers must cultivate respect through daily exemplary personal behaviour, performance, openness, and social competence. They are expected to set clear and ambitious goals, leading by example. Compliance is always expected, and managers must be accessible to employees who wish to raise concerns or discuss work-related issues. However, employees also have responsibility for compliance and ethical conduct in the workplace.

Treatment of other Business Partners and third parties

Fair Competition and anti-trust Laws

Market competition must be fair, and all Business Partners are required to comply with the rules of fair competition. We expect our Business Partners to abide by anti-trust regulations, which may involve refraining from discussing sensitive topics such as prices, sales, or production with competitors, avoiding agreements that restrict competition, and avoiding practices that could influence prices. Business Partners are also prohibited from using unethical methods to obtain competitive intelligence or spreading false information about competitors.

Overall, the goal is to promote fair competition and prevent any anti-competitive behaviour, regardless of the industry or location.

Anti-Corruption: offering and granting advantages

At ADB SAFEGATE, we believe in fair competition based on the quality and price of our innovative products and services. We do not offer improper benefits to anyone, whether it is a private commercial counterparty or a government official. The term "government official" encompasses individuals working for any government or public body, including state-owned enterprises and international organizations. It includes political candidates, party officials and employees, and political parties.

To ensure compliance with applicable laws and ADB SAFEGATE policies, we strictly prohibit our Business Partners from directly or indirectly giving money or anything else of value to influence official action or obtain an unfair advantage. This includes not making any offers, promises,

grants, or gifts that appear to be an attempt to improperly influence a government official or bribe a commercial counterparty.

If any money or thing of value is given indirectly to a third party, we require our employees to ensure that those third parties understand and will abide by ADB SAFEGATE's anti-corruption policies. As a result, we are committed to maintaining the highest standards of ethical behaviour and transparency.

Anti-Corruption: demanding and accepting advantages

Business Partners are prohibited from using their position to request or accept any form of illicit gain. They are allowed to accept occasional symbolic gifts, as well as reasonable meals and entertainment that align with local customs. Gifts, meals, or entertainment beyond these limits must be declined.

Political contributions, charitable donations and sponsoring

ADB SAFEGATE does not engage in political contributions, such as donations to politicians, political parties, or political organizations. Any donations or sponsoring activities will be determined at the level of ADB SAFEGATE group's CEO and CFO.

Government procurement

At ADB SAFEGATE, we compete for contracts from governments and government-owned businesses worldwide. We always maintain transparency, honesty, and accuracy in our dealings. We strictly adhere to all applicable laws and regulations governing government procurement, which include laws that prohibit any attempts to improperly influence government officials.

Anti-money laundering

ADB SAFEGATE is committed to conducting business only with reputable customers, consultants, and Business Partners who engage in lawful business activities and obtain their funds from legitimate sources. We strictly prohibit money laundering and expect our Business Partners to adhere to applicable anti-money laundering laws and our internal procedures. Our Business Partners should stay vigilant and immediately report any suspicious behaviour by their employees, customers, consultants, or other third parties to our Group Compliance Officer to avoid any potential issues in this regard.

Trade controls

ADB SAFEGATE adheres to all relevant export control and customs laws and regulations in the countries where it operates.

Export controls apply to the transfer of goods, services, hardware, software, or technology across certain national borders, including via email. Business Partners who engage in importing or exporting goods, services, hardware, software, or technology must comply with applicable economic sanctions, export control, and import laws and regulations, as well as any related policies and procedures established by their employer.

Sanctions programs

It is imperative that our Business Partners maintain strict compliance with sanctions programs worldwide. We expect our partners to conduct their business in adherence with the applicable

sanctions lists and regulations. Failure to comply with these legal requirements can result in significant harm not only to their business but also ours. Therefore, we require our partners to remain fully up to date with all the latest sanctions programs and to take all necessary measures to ensure compliance.

Avoiding conflicts of interest

ADB SAFEGATE's Business Partners have a responsibility to act in the best interests of ADB SAFEGATE. Conflicts of interest may arise if Business Partners partake in activities that could potentially harm ADB SAFEGATE's interests. Therefore, Business Partners must disclose any conflicts of interest they may have in connection to their assignment to ADB SAFEGATE.

Handling of information

Records and financial Integrity

To establish and maintain effective communication with investors, employees, customers, Business Partners, and the public, ADB SAFEGATE emphasizes the importance of accurate and truthful reporting in all its transactions. ADB SAFEGATE recognizes the need for sound processes and controls to ensure that all transactions are executed according to management's authorization and to prevent unauthorized use of its assets. As such, all employees are reminded to maintain complete, accurate, and timely books and records that honestly reflect each transaction or expenditure, adhering to applicable accounting rules and standards.

It is the responsibility of all ADB SAFEGATE employees to ensure that any books and records they create or are responsible for accurately reflect all transactions or expenditures, are complete, timely, and adhere to applicable accounting rules and standards. This applies to all data, certifications, and written materials used for financial reporting and disclosure purposes as well as those collected for other purposes.

Confidentiality

It is essential to uphold confidentiality regarding ADB SAFEGATE's internal confidential or proprietary data that has not been disclosed to the public. Similarly, non-public data related to suppliers, customers, employees, agents, consultants, and other third parties must be safeguarded based on legal and contractual obligations. The confidential or proprietary data could include details about the company's organization, equipment, prices, sales, profits, markets, customers, business-related matters, and information on research and development. As the disclosure of confidential information has the potential to harm ADB SAFEGATE's business, clients, or customers, it is crucial to maintain confidentiality, and the obligation to do so continues even after the termination of a relevant relationship.

Data Protection

Access to the Intranet and Internet, worldwide electronic information exchange and dialogue, and electronic business dealings are integral to business success. However, these benefits come with risks that threaten personal privacy protection and data security. Therefore, effective

consideration of these risks is necessary for effective information technology management, leadership, and behaviour.

Personal data may only be collected, processed, or used for pre-determined, transparent, clear, and legitimate purposes, and in a secure manner with appropriate precautions taken when transmitting it. High standards must be maintained about data quality, technical protection against unauthorized access, and transparency regarding use and correction of information while safeguarding the rights of those concerned.

In some contexts, strict laws and regulations govern the collection and use of personal data, including data on customers or business partners. All Business Partners must comply with such laws to protect privacy.

Cybersecurity

Our company has achieved ISO 27001 certification for certain sites within our group and we are working towards achieving a multi-site certification. ADB SAFEGATE places great emphasis on data/cybersecurity, requiring Business Partners to take reasonable measures to maintain confidentiality, integrity, and the availability of information. This encompasses physical and logical security controls to protect against unauthorized persons and use of encryption, firewalls, antivirus software, and other appropriate technology. Compliance with data protection and privacy laws and regulations is imperative. Any security breach that affects our information or systems must be immediately reported to Cybersecurity@adbsafegate.com. By adhering to these guidelines, our Business Partners can help protect our organization and build customer trust.

Environment, Social and Governance

We have achieved ISO 14001 certification for certain sites within our group, which demonstrates our commitment to environmental sustainability and responsible business practices.

Our company is working hard to prioritize Environmental, Social, and Governance (ESG) factors in our operations. We are taking significant steps to reduce our carbon footprint, conserve natural resources, and minimize waste. We also prioritize the well-being of our employees and customers. We have established high ethical standards for ourselves and are committed to transparency and accountability. Through our efforts, we aim to be a sustainable and responsible corporate "citizen" that contributes positively to society while achieving our business goals. Furthermore, we expect our Business Partners to share our commitment to ESG and to work with us to achieve mutual sustainability goals.

Health and safety

Protecting the welfare of employees in the workplace is a paramount concern for ADB SAFEGATE. It is a shared duty among all members of the organization to facilitate ADB SAFEGATE's efforts to execute its responsibilities without endangering the safety of its workers. To this end, ADB SAFEGATE is making its best efforts to adopt health and safety management systems that comply with ISO 45001 standards, resulting in certification for specific sites.

Complaints

Any circumstances indicating a violation of our Business Conduct Guidelines should be reported to Compliance@adbsafegate.com. Complaints can be submitted confidentially and will be thoroughly investigated. Corrective measures will be implemented if deemed necessary. We will keep all documentation confidential to the extent permitted by law and will not tolerate any retaliation against complainants.

APPENDIX 1

Relevant references

- Universal Declaration of Human Rights: Outlines fundamental human rights to be universally protected. It was adopted by the United Nations in 1948.
- The European Convention for the Protection of Human Rights and Fundamental Freedoms; is commonly referred to as the European Convention on Human Rights (ECHR).
- The convention established the European Court of Human Rights, which has the power to hear complaints from individuals, groups, and states alleging violations of the Convention by a member state. Its decisions are binding on member states and have contributed significantly to the development of human rights protection in Europe.
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises: These are comprehensive recommendations for responsible business conduct in areas such as employment, human rights, environment, information disclosure, combating bribery, consumer interests, science and technology, and taxation.
- UK Bribery Act (2010): Sets legal stipulations around bribery, including penalties for those found guilty.
- Modern Slavery Act (UK, 2015): Includes provision about slavery, servitude, and forced or compulsory labour.
- United States Foreign Corrupt Practices Act (FCPA): U.S. law aimed primarily at preventing the bribery of foreign government officials in international business transactions.
- The European Union's General Data Protection Regulation (GDPR): Defines how companies use, store, and secure EU citizens' data.
- International Labour Organization (ILO) Standards: Outlines standards for international labour rights, such as collective bargaining, abolition of forced labour, eliminating child labour, and equal remuneration.
- United Nations Global Compact: Encourages businesses to abide by ten principles related to human rights, labour, the environment, and anti-corruption.