



# BUSINESS PARTNER CODE OF CONDUCT



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The Mubadala Group<sup>1</sup> maintains the highest ethical standards in its business activities and expects the same from its Business Partners<sup>2</sup>. Acting ethically means complying with all applicable laws and regulations, and conducting business in an ethical manner.

We can only fulfill this commitment to integrity and compliance if our Business Partners share this commitment. The Mubadala Group Business Partner Code of Conduct sets forth minimum expectations for Business Partner conduct when performing work for or on behalf of the Mubadala Group. The principles set out in this Code must also apply to any contractor or subcontractor engaged or employed by a Business Partner to perform work for or on behalf of the Mubadala Group.

We expect all Business Partners to be alert to any potential violations of law or this Code in the context of your relationship with the Mubadala Group. You are required to cooperate with the Mubadala Ethics & Compliance Office in the resolution of any concern, including making relevant documents, information, and employees available when requested and by maintaining the confidentiality of any such request. In particular, you must immediately inform us if you are notified by a regulatory authority or any other external party of an audit, investigation, lawsuit, or other inquiry regarding the Mubadala Group, if not prohibited from doing so. We strictly prohibit retaliation of any kind against anyone who reports a concern in good faith and require the same of you.

By doing business with the Mubadala Group, you are deemed to have read and agreed to comply with this Code. Failure to adhere to these standards may reflect negatively on your relationship with the Mubadala Group.

If you have a concern about the conduct of the Mubadala Group or a Mubadala Group employee or Business Partner, you can reach the Mubadala Ethics & Compliance Helpline (anonymously or otherwise) at:

**Facsimile:** +971 2 413 5059  
**E-mail:** [compliance@mubadala.ae](mailto:compliance@mubadala.ae)  
**Post:** Mubadala Investment Company PJSC  
Ethics & Compliance Office  
PO Box 45005  
Abu Dhabi, UAE

**For questions or queries relating to general procurement matters, please contact Mubadala Group Procurement:**  
[procurementhelpdesk@mubadala.ae](mailto:procurementhelpdesk@mubadala.ae)

**For information, questions or concerns about this Code, please contact the Mubadala Ethics & Compliance Office:**  
[compliance@mubadala.ae](mailto:compliance@mubadala.ae)



1. **Mubadala Group** means Mubadala Investment Company PJSC (**Mubadala**); any entity, operation, or investment controlled by Mubadala; and/or any entity, operation, or investment that adopts the Mubadala Group Code of Ethics

2. **Business Partner** means any party who supplies goods or provides services to the Mubadala Group or to another party for or on behalf of the Mubadala Group



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# RESPECT

## Human Rights:

You must abide by applicable national and international human rights principles.

## Employment Practices:

You must comply with all applicable laws, rules and regulations in relation to employment practices. As a minimum, pay fair wages and observe reasonable and safe working hours and conditions.

## Fair Treatment:

You must treat all employees and contractors fairly, with dignity, respect, and integrity. Do not discriminate, harass, intimidate, threaten, humiliate, or abuse employees or contractors.

## Child & Forced Labor:

You must not use, employ, or seek to exploit in anyway the services of child, under-aged, slave or trafficked labor. This includes any form of indentured servitude, such as use of physical punishment, confinement, and threats of violence.

## Healthy & Safe Workplaces:

A healthy and safe working environment must be provided to all employees. As a minimum, this includes safe drinking water, adequate lighting, temperature, ventilation, and sanitation. All facilities and housing conditions, if provided, must be constructed and maintained in accordance with the standards set by applicable laws and regulations.

# CONFIDENTIALITY

## Confidential Information:

You must safeguard Mubadala Group confidential data and follow relevant data protection, privacy, and information security laws and regulations. In doing so, you agree only to acquire, or seek to acquire, confidential information or personal data through proper means. That information must be kept secure and accessible only to those with a legitimate need to access it. You will not discuss, disclose, transfer, release, or share any confidential information or personal data concerning the Mubadala Group without prior written consent from us.

## Competitive Information:

You will not seek to obtain or use insider, material, or confidential information that belongs to competitors or other third parties. You will return any materials mistakenly, or otherwise, received containing such competitive information to [compliance@mubadala.ae](mailto:compliance@mubadala.ae)



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# INTEGRITY

## Anti-Bribery & Corruption:

We have zero tolerance for any form of bribery or corruption. You must comply with applicable anti-bribery and anti-corruption laws and to behave ethically in all business dealings for or on behalf of the Mubadala Group.

## Improper Payments:

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

## Gifts & Entertainment:

Because gifts and entertainment may be used to disguise bribery and corruption, we require that you only offer or accept gifts or entertainment that are reasonable, directly related to a proper business purpose, and in accordance with local laws governing such activity. Cash or cash equivalents are not permissible. Any offer of a gift or entertainment to one of our employees during an open bidding process in which you are involved is strictly prohibited. If there are any doubts as to what Mubadala Group employees may or may not offer or receive with respect to gifts and entertainment, do not hesitate to reach out to us directly for clarification.

## Supply Chain:

You must carefully scrutinize, select, and monitor the third parties you use to act for or on behalf of us. Both you and we are potentially responsible for the conduct of these third parties when they are working for or providing services to the Mubadala Group. Failure to fulfil this responsibility may lead to fines, loss of necessary operating authorizations, restrictions on Government contracts, and other legal penalties. You must conduct appropriate diligence and background checks on these thirds parties. We require, as a minimum, that you gather, analyze, manage, and monitor information to ensure that any third parties that you use have a shared commitment to abiding by applicable laws. This would include checking the legitimacy and background of third parties before they commence a business relationship with you and monitoring them throughout the course of that relationship. Third parties, contractors, agents, representatives or subcontractors should only be selected based on merit and competitiveness. You are responsible for ensuring that your own third parties comply with this Code with respect to business conducted for or on behalf of the Mubadala Group.

## Competition:

You are expected to comply with the competition laws in the countries where you operate, sell or provide products and services. You must not coordinate market conduct with competitors or your own Business Partners in a way that improperly restricts competition. You must not discuss internal or material non-public information, such as prices, discounts, pricing policy, profits, market share, production levels, customers, or sales territories with a competitor, particularly concerning work performed for the Mubadala Group.



# TRANSPARENCY

## Conflicts of Interest:

You must avoid any activity that creates a conflict of interest or the appearance of a conflict of interest that brings into question your relationship with the Mubadala Group. This includes conflicts of interest that may result from financial interests, employment, time commitments, outside directorships, stock ownership, friends/family relationships, sponsorships or honorariums, and use of confidential information. You acknowledge that you will not use your position to profit personally at the expense of the Mubadala Group.

## Books & Records:

Accurate and transparent books and records should be maintained at all times and demonstrate compliance with applicable laws and regulations. You must be watchful for, and report, any irregular payments, suspicious transactions, or suspected money laundering.

## Audits & Assessments:

You are expected to cooperate with internal and external investigators and auditors. You must notify us of any ethics and compliance concerns you have with respect to any dealing you have with the Mubadala Group or our employees. In addition, we and our external representatives have the right to inspect and audit your books, records and accounts relating to work done for or on behalf of the Mubadala Group, as well as conduct operational audits, upon the provision of reasonable notice.

# SUSTAINABILITY

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



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# CONTACT US

## Mubadala Investment Company

Report any questions or concerns to:

Ethics & Compliance Office

+971 2 413 3333

compliance@mubadala.ae

<b>Version</b>	<b>2</b>
<b>Number</b>	2.1
<b>Issue Date</b>	August 2020
<b>Effective Date</b>	August 2020
<b>Next Review</b>	December 2023
<b>Classification</b>	Public
<b>Notes</b>	<ul style="list-style-type: none"> <li>Name changed to Business Partner Code of Conduct</li> <li>Emphasis on failing to comply with Code will negatively affect the relationship with the Mubadala Group</li> <li>Need to comply with international Human Rights principles</li> </ul>
<b>Owner</b>	<p><b>Head of Ethics &amp; Compliance</b></p> <p>The Policy Owner is responsible for periodically updating and reviewing this Policy to reflect regulatory, best practice and business developments</p>
<b>Approver</b>	<p>Audit, Risk &amp; Compliance Committee</p> <p><b>Mubadala Investment Company PJSC</b></p>