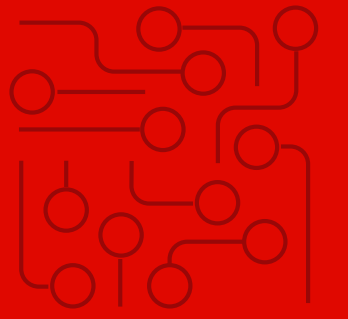
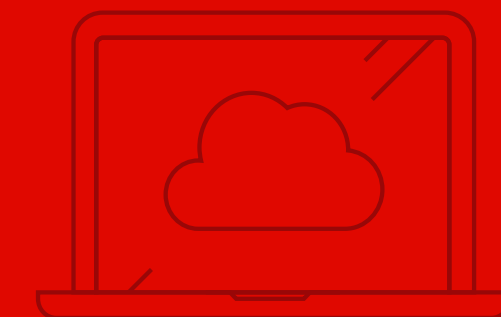
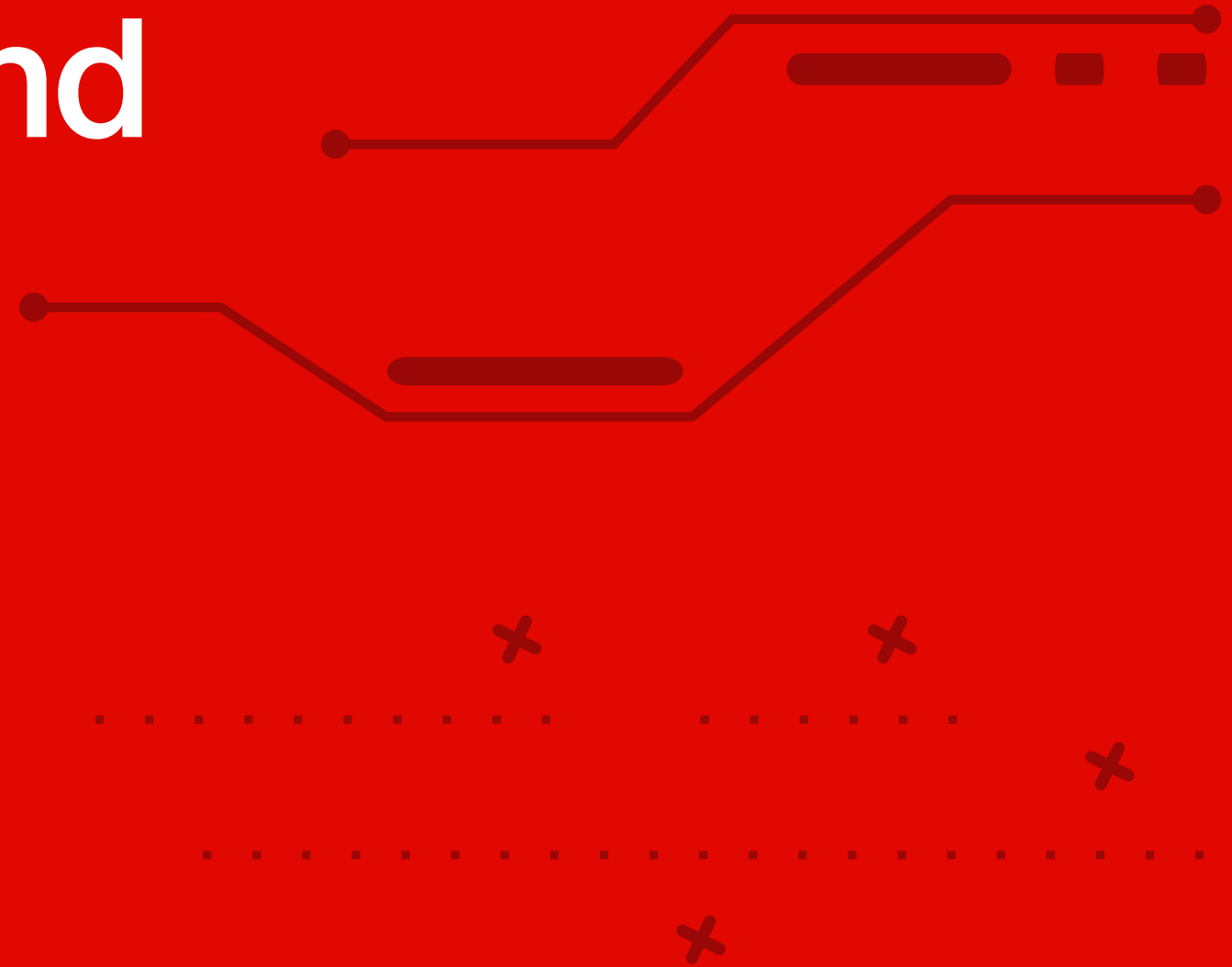
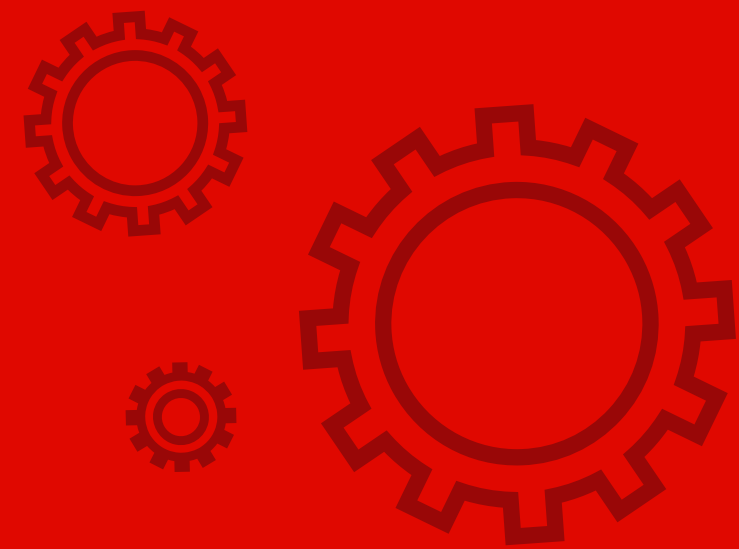




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e&'s Supplier Code of Ethical Conduct





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Supplier
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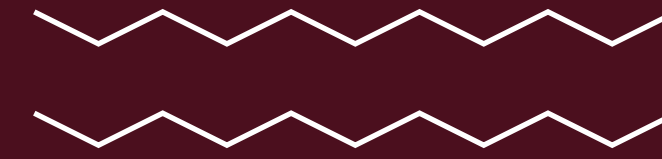
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& Safety

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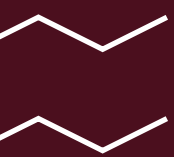
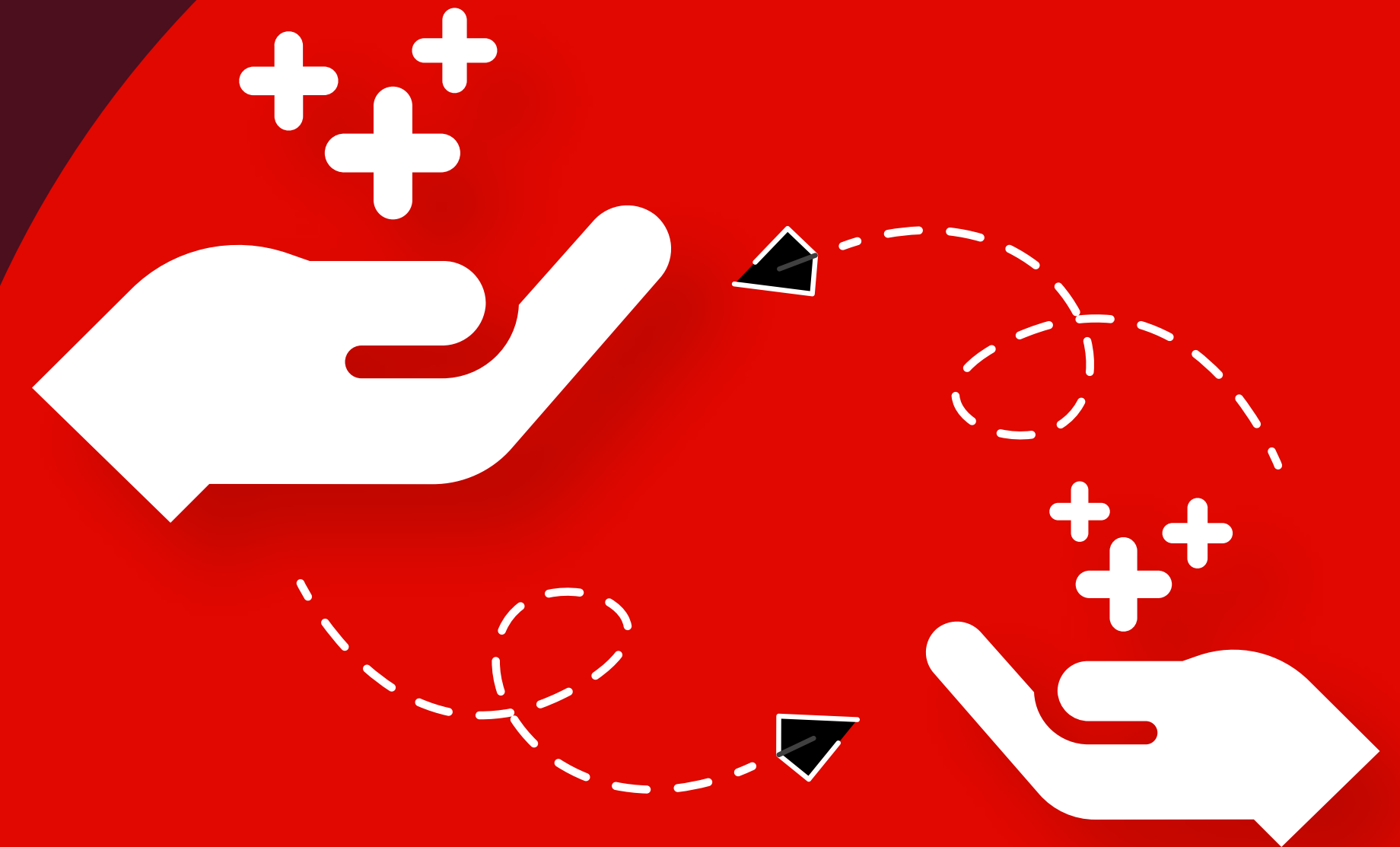
Speak Up



Getting it done together.

We aim to operate as good global citizens conducting business with integrity, responsibility and transparency.

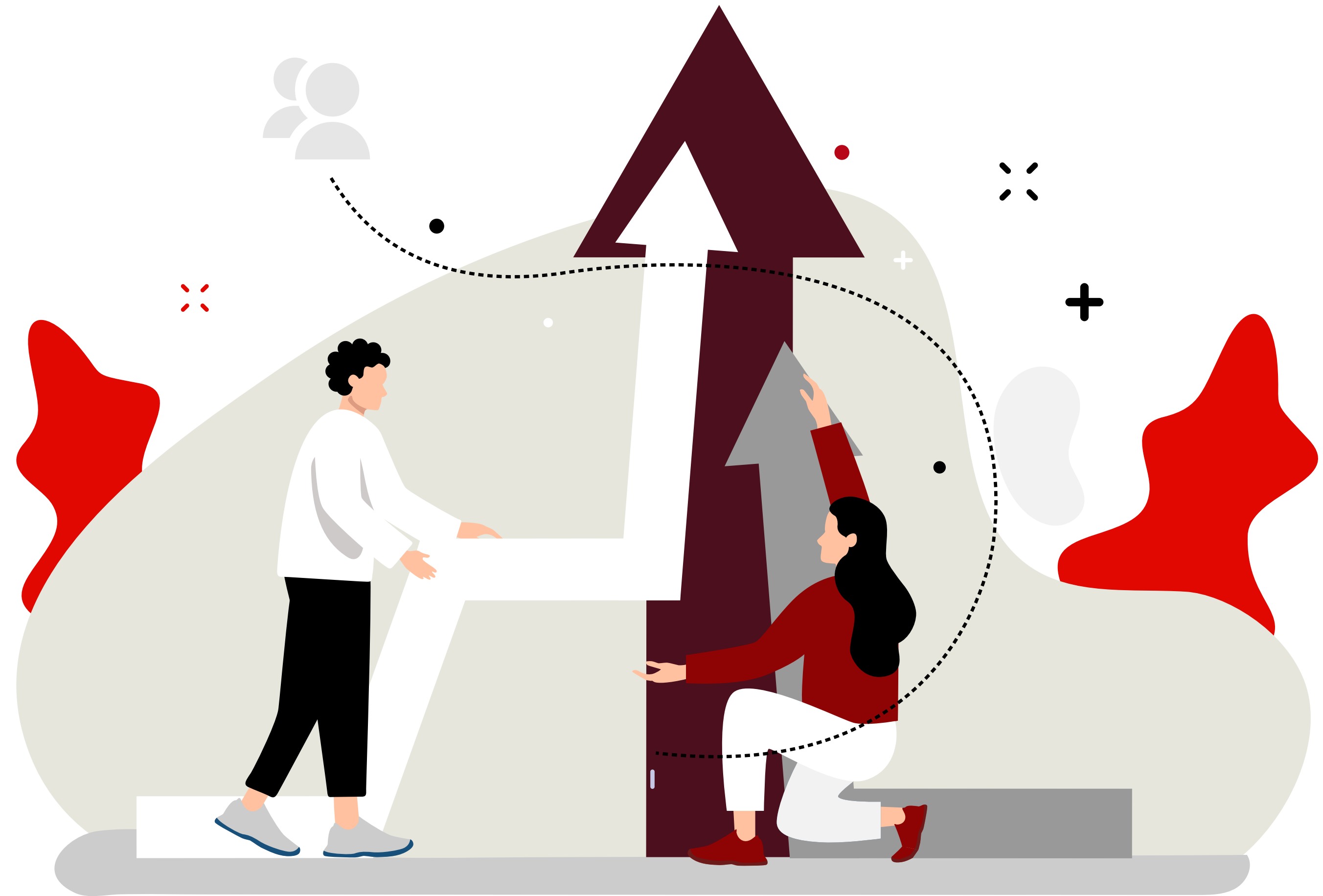
We are committed to making possible by helping improve the lives of our stakeholders, customers and the communities and environment where we operate.

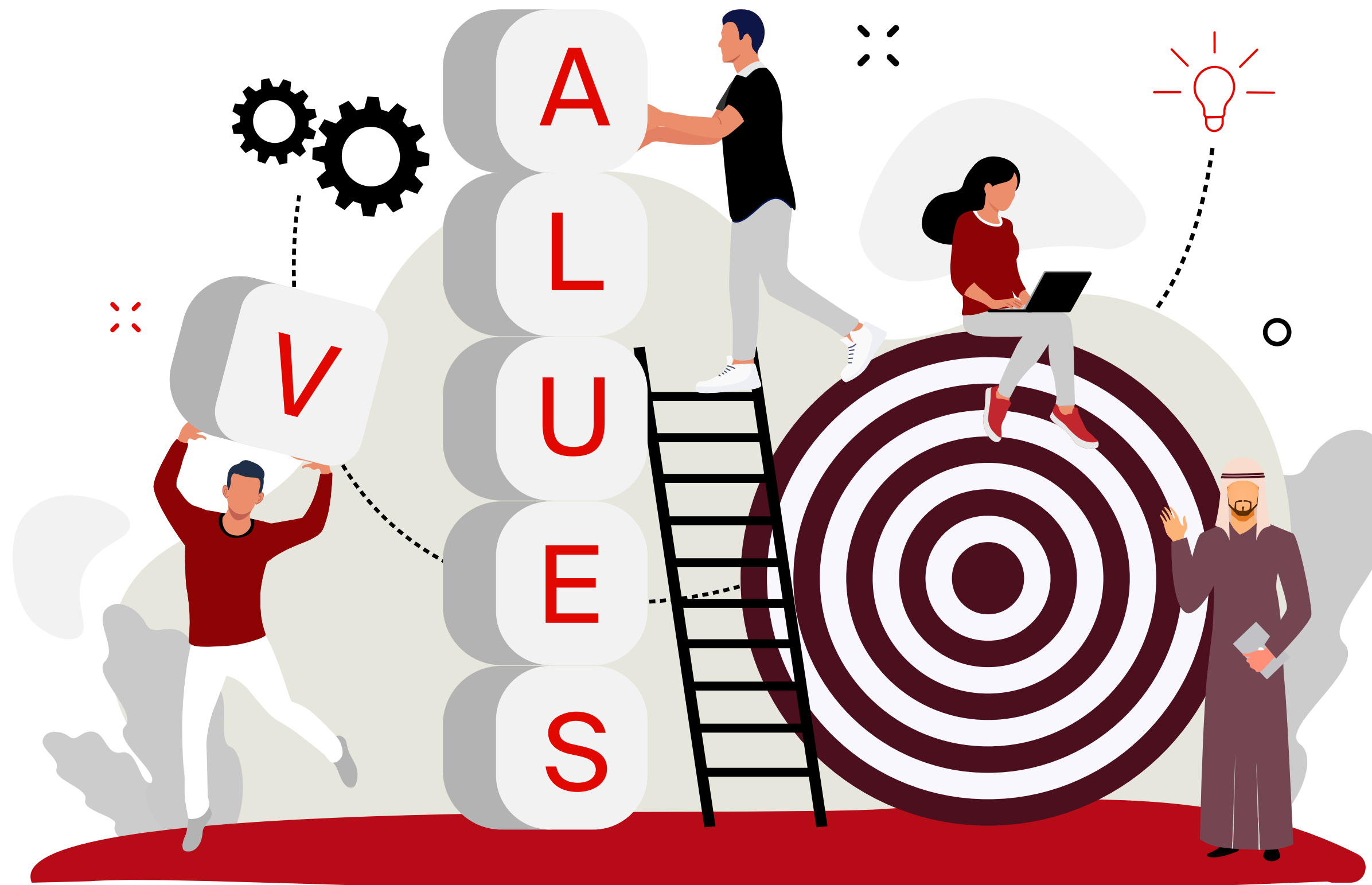


1 Who does this apply to?

The term Supplier means any person, entity or organisation that provides or seeks to provide e& with products, goods, or services. This includes all officers, employees, contractors, subcontractors, and business partners of any Supplier.

This Supplier Code of Ethical Conduct (the “Code”) applies to all Suppliers conducting dealings or business with e& and/or providing or seeking to provide e& with products, goods, or services.





2 — About our Supplier Code

Emirates Telecommunications Group Company P.J.S.C. (“e&”), is fully committed to doing business in accordance with the highest standards of ethics and integrity, with professional business principles and in compliance with all applicable laws in the countries in which we operate.

We highly value the importance of earning and maintaining the trust of our customers and stakeholders in our operations and accordingly, we expect our Suppliers to abide with this Code and conduct all our business and relationships with the highest standards of ethics to maintain this trust.

This Code sets out Supplier’s obligations in relation to compliance with ethical conduct, any relevant legal obligations including anti-bribery and anti-corruption, and regulations and standards in the countries in which the Supplier operates.

The purpose of this Code is to promote the responsible management of social, ethical, and environmental issues in e&'s supply chain in accordance with e& commitments to global Environmental, Social and Governance (ESG) goals and standards. This includes issues such as safe working practices, labour, environmental and sustainability standards, the responsible sourcing of minerals, and importantly, health and safety.



3 — Selection and Onboarding

To ensure that e& works with the right third parties and to protect e&'s brand and reputation, we conduct a thorough registration/selection, due diligence, and engagement process prior to onboarding or engaging any Supplier.

The Supplier is encouraged to ensure that its own providers and subcontractors are made aware of the principles of this Code when undertaking any work, or providing any product or service to, or on behalf of e&, and shall take reasonable steps to ensure that its selection processes also include adequate due diligence on subcontractors.

The Supplier shall ensure it does not commence any work or activities on behalf of e& until it confirms it has read, understood, and will comply with all the principles set out in this Code.

4 — Supplier Monitoring

The Supplier must ensure they have processes in place to identify, correct and monitor the continued compliance of any activities that fall below the standards of ethical conduct set out in this Code.

Any breach of this Code may be considered a material breach of any agreement or contract with e&, and e& reserves its legal rights and remedies in respect of any such breach.





5 — Data Protection, Privacy, and Confidentiality and Intellectual Property Rights

At e&, we respect the privacy of our customers and third parties, as well as of others with whom we conduct business.

The Supplier must handle any confidential or customer personal data with due care and in accordance with applicable laws and regulations, ensuring it has a process in place to ensure access and storage of this data is managed securely.

The Supplier shall ensure that any authorised processing of e& confidential or customer information should be limited to appropriately trained and authorised individuals who need it to carry out their work, in accordance with applicable laws and regulations and for legitimate business purposes only.

The Supplier must ensure they protect any e& confidential or customer information from improper disclosure.

The Supplier shall respect e&'s brand and intellectual property rights ("IPR") and manage any technology and know-how it receives from e& in a manner that protects these e& IPR and know-how and refrain from any act or omission that would undermine such IPR.



6 — Modern Slavery, Child Labour and Human Trafficking

e& is committed to ensuring all workers in our supply chain receive fair and equal treatment in full compliance with the laws, rules, and regulations of the countries in which it conducts business and operations. In case there are different standards set forth in this Code compared to the applicable laws, rules, and regulations, e& expects the more stringent requirements to be applied.

e& prohibits the use of forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise. No employee or worker may be compelled to work through force or intimidation of any form, or as a means of political coercion. We operate a zero-tolerance policy for any form of Human Trafficking in our operations and supply chain. The Supplier shall not permit the use of any form of forced, bonded, compulsory labour, or Human Trafficking. We will treat any reported incidents seriously, with respect and in confidence.

e& condemns all forms of exploitation of children. We are committed to prohibiting and eliminating the use of child labour in our operations and supply chain. Our aim is to ensure that all our operations remain in compliance with applicable laws, rules, and regulations. The Supplier shall not knowingly use any child labour and should not employ or engage anyone who is below the minimum legal age for employment.



All the Supplier's employees shall be freely employed. This means all employees must be provided with employment contracts that stipulate the employee's rights to terminate their employment with reasonable notice, working hours, and the minimum wage and required benefits in line with applicable local laws.

The Supplier shall not withhold payment, use wage deductions as a disciplinary measure, or place debt upon employees, or require employees to surrender any government-issued identification, passports, or work permits as a condition of their employment.

The Supplier shall not engage in or support the use of corporal punishment, threats of violence or other forms of mental or physical coercion. All employees shall be treated with dignity and the Supplier shall maintain a work environment that is free of any sort of physical punishment. e& will treat all incidents of non-compliance seriously and with respect and we will promptly investigate all allegations of physical punishment.

7 — Discrimination

e& believes that everyone should be treated with dignity and respect, therefore, e& prohibits all forms of discrimination, harassment, humiliation, threats of violence and abusive or offensive behaviour.

The Supplier shall not engage in, or support, any form of discrimination, in hiring, employment terms, remuneration, access to training, promotion, termination, retirement procedures or decisions including but not limited to race, ethnicity, skin colour, age, gender or any other characteristics protected by law, including pregnancy, disability, religion, political affiliation, nationality, medical condition, social origin, social or marital status.





8 — Bribery and Corruption

e& is committed to preventing Bribery and Corruption around the globe. e&'s stance means that regardless of local customs, we never receive or provide Gifts, Entertainment, Hospitality or any other benefits that are motivated by an improper purpose, such as to gain an inappropriate business, personal or other advantage.

The Supplier shall not engage in or enter into any form of bribery, including improper offers or payments to or from e& employees, customers, suppliers, organisations or individuals.

The Supplier shall abide by all applicable anti-corruption laws and conventions.

The Supplier shall have an anti-bribery policy that sets out the principle of zero tolerance for any form of bribery or corruption within their organisation. The Supplier shall ensure that its employees, contractors and sub-contractors are aware of its anti-bribery policy and how to comply with its requirements.

While doing business with or on behalf of e&, or fulfilling any agreement or contract with e&, the Supplier must not offer, give, promise, receive or request any bribes (for financial or any other improper advantage) in relation to any public or government official.

9 — Money Laundering

The Supplier shall act in accordance with all applicable international standards and laws on fraud and money laundering and (where appropriate) maintain an anti-money laundering compliance programme, designed to ensure compliance with the law including the monitoring of compliance and detection of violations.





10 — Health & Safety

The Supplier shall ensure it provides a safe working environment for its employees and subcontractors accordance with international standards and applicable laws and regulations.

The Supplier shall ensure it meets general principles of health and safety risk prevention. General principles include ensuring it has systems and processes in place for identifying, minimising, and preventing health and safety hazards, using competent and trained people, providing and maintaining safe equipment and tools, including ensuring personal protective equipment is made available as required.

The Supplier shall ensure that these health and safety obligations are communicated and applied to all parties including subcontractors when undertaking any work or activities on behalf of e&.



11 — Environment and Climate Change

The Supplier shall commit to enhance sustainability practices with a view to protecting the environment. Supplier shall, upon request by e&, demonstrate how it is minimising its use of finite resources (such as energy, water, and raw materials) and the release of harmful emissions to the environment (including waste, air emissions and discharges to water).

The Supplier shall seek to improve the environmental performance of the products and services it provides, as well as support and prioritise those products and services that offer environmental and social benefits to e&'s customers.

The Supplier shall comply with relevant legislation and international standards, and in countries where environmental legislation is not evident or enforced, ensure that adequate and reasonable practices for managing environmental impacts are in place.

The Supplier shall identify, monitor, and minimise Greenhouse Gas emissions (GHG) and energy consumption from its own operations including CO2 emissions from transportation and travel.

12 — Speak Up

The Supplier shall provide an anonymous complaint mechanism for its managers and workers to report workplace grievances and shall take measures to protect whistleblower confidentiality and prohibit retaliation.

The Supplier shall report any instances of illegal or unethical behaviour or breaches of this Code (in relation to the goods and services being provided to e&) in confidence using the 'Speak Up' contact details below.

If you have any questions or concerns on how to apply this Code please email ethicsandcompliance@eand.com. You may also anonymously report any violations or breaches of this Code via whistleblower@eand.com



e&'s Supplier Code of Ethical Conduct



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Date: 19th March 2023

