



## Vendor Code of Conduct



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## 1-Introduction

ADAC Group maintains high ethical standards in its business activities and expects the same from its Vendors. Ethical compliance, means behaving ethically, complying with all applicable laws and regulations and conducting business with respect for principles of humanity and respect when dealing with both colleagues and external parties.

ADAC Group is committed to fostering positive relationships with Vendors and supporting their businesses in compliance with all standards and applicable laws, and expecting the same commitment from the Vendors to support our business and contribute positively.

This Vendor Code of Conduct document, hereinafter referred to as the 'Code', aims to protect the integrity of procurement process and to provide a statement governing the conduct of Vendors of ADAC Group.

The Code sets the minimum expectations for Vendor conduct while participating in a tendering process or/and performing work for or on behalf of ADAC Group. Failure to adhere to the standards of this Code may reflect negatively on a Vendor's relationship with the ADAC Group and future business interest.

For further information, questions or concerns about the Code, contact ADAC Group Procurement at [compliance@adac.ae](mailto:compliance@adac.ae)

For the purpose of this Code –

**ADAC Group means** Abu Dhabi Airports Company PJSC (ADAC); any entity, operation, or investment controlled by ADAC; and/or any entity, operation, or an investment that adopts the ADAC Group Code of Conduct.

**Vendor means** A person or organization including, for example, contractors, sub-contractors (at any level), suppliers, consultants and other stakeholders; or associates of such organisations; or employees of such organizations (or their associates) –

- currently doing business with ADAC Group
- seeking or who may in the future seek to do business with ADAC Group
- who is, or may be a potential partner of ADAC Group in relation to a business venture, or otherwise in a commercial relationship with ADAC Group.
- Who may represent ADAC Group and working on ADAC's behalf

## 2-Ethical Standards

ADAC Group expects vendor's performance and standards of conduct to be in line with this Code and any contract obligations. Our Vendors should to act in a manner that upholds our reputation and support ADAC's business considering all applicable laws, regulation ,policies, and ethical stands standards

### 2.1 *Corporate Governance and Ethics*

ADAC Group is committed to conducting business in an honest and accountable way whilst maintaining the highest level of corporate ethics. Below are the minimum expected standards

- Compliance with all applicable UAE laws and regulations concerning anti-bribery ,and anti-corruption, Business Courtesies , Money Laundry and prohibited business practices;
- Have effective policies and procedures in place to ensure compliance with the applicable laws and regulations and business ethics policies; and
- This Code is communicated to all staff dealing with ADAC Group and staff are trained to understand their obligations

### 2.2 *Supply Chain*

ADAC Group believes that conduct of Vendors affect durability, integrity and its business reputation and has a wider impact on the stakeholder community and its customers. Below are the minimum expected standards

- Similar principles of this Code are extended and applied in Vendor's supply chain;
- Subcontractors engaged to work at ADAC Group understand and are familiar with this Code.

### 2.3 *Assessment and Review*

ADAC Group will work proactively with Vendors to ensure alignment with expectations set out in this Code. Hence the minimum expectation

- Transparency and openness
- Regular assessments
- Feedback and questionnaire
- Site based reviews/ audits of Vendors as needed

### 2.4 *Respect and Workplace*

ADAC Group strictly adheres to the labor law and human rights particularly those of the Emirates Abu Dhabi and UAE. ADAC deals with All Vendors in dignity, respect and fairness. Below main considerations

- Fair treatment with employee and contractors with respect and dignity and clear from any discrimination Forced Labor and child is prohibited conduct, and any form of indentured, servitude or exploiting the use of under aged children.
- Safe and health workplace condition is the minimum provided to employee.

### 2.5 *Sustainability*

ADAC Group is Committed to comply with the applicable environmental laws and regulations. Also working in a consistent inclined performance to continue achieve improvement and sustain our achievement. below are main highlights

- Minimize waste of resources ( Energy, water ,etc..)
- No discharge with adverse impact on environment
- Consider recycle

## 3-Vendor Responsibility

All Vendors are expected to implement the minimum standards of compliance and ethical behavior as given in ADAC Group's Code of Conduct.

Furthermore, vendors are required to take appropriate steps to ensure that the provisions of the Code are communicated to, and adhered to, by your employees (including directors), contractors, sub- contractors (at all levels), suppliers, representatives, etc.

All Vendors shall comply, without limitation, with the following business and legal practices:

### *3.1 Business Practices*

- Vendors shall not solicit or obtain, directly or indirectly, from any ADAC Group employee, any information relating to current or future contracts, or a specific pending procurement, unless such information is at the time a public record required to be disclosed or has otherwise been made available at the same time in the same form to all other bidders or contractors.
- Vendors shall not collude, directly or indirectly, with any other competing entity prior to the closing date for the bids.
- Vendors will not make any attempt to induce any other individual or entity to submit or not to submit a bid.
- Unless otherwise approved, Vendors engaged in the development of a scope of work, solicitation documents, contractual instruments or technical specifications will not participate as a contractor or sub-contractor on that particular procurement or perform any work on that particular procurement or any other procurement that would constitute an organizational conflict of interest or would give that contractor an unfair advantage over other bidders on that procurement.
- Vendors doing or seeking to do business with the ADAC Group should not make false or misleading representations regarding any aspect of the performance of a contract/price agreement.
- Vendors shall immediately disclose any actual or potential conflict of interest to ADAC's Head of Ethics and Compliance and shall not deal directly with any ADAC Group employee if there is a conflict of interest.
- The Vendor must expressly declare any conflict of interest it may have either with employees or ex-employees of ADAC Group or with any of the contractors or consultants working for ADAC or with any of the participating bidders in the

tendering process, as per the “Conflict of Interest Declaration form”;

- The Vendor must expressly declare that they have not employed or intend to employ any of the ex-employees of ADAC within two years of the ex-employees leaving ADAC employment and if in case employed such ex-employees prior to participating in a tendering process, then to make an expressive declaration in the tender submissions. [this should be verified with Legal to align with HR policy]
- Vendors shall exercise reasonable care and diligence to prevent any actions or conditions, which could result in a conflict with the best interests of ADAC Group. Vendors’ efforts shall include, but not limited to, establishing precautions to prevent its employees, contractors, suppliers, representatives, etc., from making, receiving, providing, or offering bribes, gifts, entertainment, payments, loans, or other considerations for the purpose of influencing individuals to act contrary to the best interests of ADAC Group.
- At no time shall Vendors who obtain confidential and proprietary ADAC Group information in the course of doing or seeking to do business with ADAC Group disclose any such information to any person not authorized by ADAC Group to receive such information or use such information for any personal gain except as necessary to fulfill their contractual obligations to ADAC Group.
- Vendors shall not make any reference to ADAC Group or the works/services performed by them in any publicity, advertising, or other publication without ADAC Group’s prior written consent.

### 3.2 Legal Practices

- Vendors must, at all time, comply with all applicable U.A.E. and international laws, rules and regulations.
- Vendors shall make available to ADAC Group or its appointed representatives all relevant documents that may be needed to verify compliance with this Code including contractual obligations.
- Vendors are required to cooperate with investigations by ADAC Group or its appointed auditor’s representatives.

*In the event a Vendor fail to comply with this Code, ADAC Group may suspend current business activity, cancel outstanding tasks/purchase orders, terminate its relationship with that Vendor or take any other action, as appropriate.*

## 4-ADAC Group's Ethics Helpline

ADAC Group has established an Ethics Helpline to answer questions and provide advice about appropriate business conduct and for making reports of improper acts such as offering bribes, fraud, theft or misappropriation and possible violations of this Code, Callers to the Whistleblowing Helpline may choose to remain anonymous.

Users of the Ethics Helpline can speak to the Compliance and Assurance team @02-5055552 without fear of retaliation. Calls are not recorded, and no attempt is made to determine the number or location from which you are calling. Users can also access the [www.adac.ae](http://www.adac.ae) that allows the same anonymity and confidentiality (if a caller wishes so) as the telephone-based Ethics Helpline.

Confidential reports of all the calls received are forwarded for evaluation and follow-up by an independent ADAC Group's Ethics & Compliance Review Committee. Any further communication with the caller, such as follow-up questions or issue resolution, is made only by the Head of Ethics and Compliance thereby ensuring the anonymity of the caller.

Vendors are required to publicize the existence and purpose of ADAC's Ethics Helpline within their organization and organizations of their contractors, sub-contractors (at all levels), suppliers, agents, etc.

If you are aware of an actual or potential violation of this Code, please contact ADAC Group's Ethics Helpline or speak to the ADAC's Head of Ethics and Compliance @ 02-5053038.

Should you require any clarification on ADAC Group's Ethics Helpline or related matters, please contact ADAC's Head of Compliance and Assurance @ 02-5053038 or [compalince@adac.ae](mailto:compalince@adac.ae).

Thank you for complying with the Code and we look forward to a mutually beneficial relationship based on the highest levels of integrity and ethical behavior.

**Shareef Al Hashmi**

*Chief Executive Officer*