



CODE OF CONDUCT

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MESSAGE FROM GCEO

At e7 Group, our reputation is built not only on the quality of the solutions we deliver, but on the way we conduct ourselves every day. Integrity, accountability, and respect are not abstract values, they are essential to the trust placed in us by governments, businesses, partners, and communities across the markets we serve.

This Code of Conduct reflects our commitment to doing business the right way. It defines the standards expected from everyone at e7 Group, regardless of role or location, and provides clear guidance for making responsible and ethical decisions in our daily work.

Each of us has a personal responsibility to uphold these standards and to speak up when something does not feel right. Protecting our integrity protects our people, our customers, and the long-term strength of our business.

Maintaining a strong ethical culture is a shared responsibility, and I thank you for your commitment to it.

Esteban Gomez Nadal
e7 Group CEO

02. INTRODUCTION

2.1. What is the code of conduct?

e7's Code of Conduct ("the Code") represents the standards of ethical conduct and expectations related to anyone who works for or with e7.

It supports the everyday application of e7's values and provides a foundation for all e7's policies and procedures, which should reflect the Code's principles.

It sets the minimal standards for our professional behavior and allows us to grow stronger by ethically working together towards achievement of our objectives.



2.2. What is e7 and its values?

e7 is an Abu Dhabi based group, offering a fully integrated ecosystem of solutions designed to meet the evolving needs of companies and organizations. From secure identity systems to high-quality printing, branding, packaging, and logistics, our seamless approach ensures that every component works efficiently, securely, and effortlessly together.

We deliver end-to-end solutions that enhance security, streamline operations, and elevate brand presence and we are the single trusted partner that brings it all together with innovation, precision, and reliability. With e7, organizations can eliminate complexity, optimize efficiency, and focus on what matters most-their growth and success. We cater to local and global clients by leveraging cutting-edge technology and best-in-class practices that deliver comprehensive solutions.

Backed by the strength of ADQ, one of the region's leading investment and holding companies, we are well-positioned for continued growth across our four key segments: Security, Printing, Packaging and Tawzea by e7.

The values of e7 shape our identity as an organization. Our values are as follows:



Trust & Transparency

We build confidence and psychological safety through honesty, integrity, transparency, and respect for employees to feel safe to speak up, challenge constructively, and perform at their best.



Teamwork

We collaborate across teams and functions, putting organization and customer outcomes above individual or departmental priorities.



Accountability

We take ownership for decisions, actions, and results in following through on commitments, addressing issues early, and learning from outcomes.

2.3. Who does this code apply to?

The Code applies to all employees of e7 regardless of the person's position, role, status, experience with e7.

e7 expects third parties, including suppliers, consultants, and business partners to follow the Code's spirit and comply with its principles while adhering to the Supplier Code of Conduct.

2.4. How to apply the Code?

Each employee is individually responsible for reading and understanding the Code as well as following it in every situation. As the Code may be revised from time to time, users should ensure that they refer to its latest version by seeking it out on the e7 website.

This Code is not an exhaustive set of rules but shall provide guiding principles to ensure that business decisions on behalf of e7 follow ethical standards and are compliant with applicable laws and hence shall be read in conjunction with other relevant policies as and when applicable.

Although the Code describes all the key areas of e7's compliance requirements, it does not cover every practical situation or dilemma which you may encounter in performing your daily work. If you are not sure about the right course of action in addressing any conduct risk, ask yourself:

- Is it legal?
- Does it comply with the values set out in this Code and other group policies?
- Is it free of any conflicts of interest?
- Could my action or decision withstand public review?
- Will my action/decision protect the group's reputation?

If you answer is "No" to any of the above questions you should not do it and instead seek counsel from your Compliance or Legal representative.

2.5. How to implement?

e7 is committed to compliance with all applicable local and international laws and regulations which relate to our business. e7's responsibility is to ensure that an effective compliance program is designed for the group, and its requirements are communicated to all e7 companies.

Implementation of the program's requirements as well as ensuring adequate compliance resources to make it effective rests with the senior management of e7 and its companies. The progress and adequacy of the solutions implemented will also be regularly verified by e7's Audit and Risk Committee and the relevant company Boards of Directors.

e7's compliance function, led by the Compliance Director, is the custodian of the Code and is responsible for supervising its appropriate implementation. The Compliance Director will also ensure annual review of the Code and any updates as required. Ensuring implementation and compliance with particular areas of the Code remains the responsibility of individual process owners (e.g., financial reporting with Finance, external communication with Corporate Communications, etc.).

e7 companies are requested to follow the requirements of the Code and treat it as a minimum standard to comply with and to adopt adequate solutions ensuring adequate implementations of e7's Code.

Every manager at e7 is responsible for making sure that the teams within his or her area of responsibility understand and follow the requirements of the Code. Furthermore, we expect our managers to behave in a way that serves as an example of commitment to e7's Values and Code requirements.

Everyone is individually responsible for complying with e7's Code of Conduct. In case of any doubts, concerns, or questions it is your responsibility to raise them accordingly and inform of any potential non-compliance you are aware of.

2.6. What happens if someone breaches the Code?

Any potential breach of the Code will be verified and investigated. If confirmed, it may result in disciplinary and/or legal action against the involved Employees and/or legal action against any involved third parties.

If you suspect that the Code of Conduct might have been breached, please refer to the "[How to report concerns?](#)" section of the Code.

03. HOW TO BEHAVE AND TREAT OTHERS

3.1. Respect and Collaboration

Sustainable success at e7 is built on respect, trust, and collaboration. We are committed to a professional environment where every individual's contribution is valued, and where dignity, fairness, and responsible conduct guide our interactions.

We do not tolerate discrimination, harassment, bullying, or abusive behaviour of any kind. We also firmly oppose all forms of forced labour, exploitation, and child labour, in line with UAE law and international best practice. Maintaining such a workplace is a shared responsibility of everyone at e7.

What is expected from you?

- a. Treat every stakeholder (internal or external) with courtesy, fairness, and respect.
- b. Collaborate constructively, support colleagues, and share success.
- c. Listen actively, respect differing viewpoints, and communicate respectfully.
- d. Share knowledge, guide others positively, and contribute to a learning culture.
- e. Demonstrate honesty, accountability, and ownership for your responsibilities and conduct.
- f. Respect working hours, demonstrate commitment, and strive to do your best.
- g. Respect UAE cultural norms and demonstrate appropriate behaviour, dress, and professional etiquette.
- h. Comply with all e7 Group human resources policies, employee handbook, legal, compliance, and governance requirements.
- i. Speak up if you witness behaviour that violates this Code, UAE law, or e7 policy.
- j. Maintain appropriate professional boundaries at all times and avoid behaviour that could cause discomfort, intimidation, or disrespect to others.

3.2. Diversity, Equality and Inclusion

e7 values the UAE's multicultural environment and is committed to workplace inclusion, equality of treatment, and respect for all nationalities, backgrounds, and cultures. A diverse and inclusive workplace strengthens performance, innovation, and collaboration.

What is expected from you?

- a. Treat everyone with dignity and respect, regardless of nationality, ethnicity, religion, gender, disability, age, or personal background, in line with UAE Anti-Discrimination law.
- b. Value different perspectives, cultures, and experiences, and encourage inclusive teamwork.
- c. Avoid language, actions, or behaviour that stereotype, exclude, disrespect, or marginalize others.
- d. Support fairness and equity in daily interactions and decision-making.
- e. Ensure equal opportunity for participation and contribution.
- f. Speak up if you witness discrimination or unfair treatment. Concerns raised in good faith will be addressed without retaliation.

3.3. Harassment, Bullying & Inappropriate Conduct

e7 is committed to providing a safe, respectful, and professional working environment in full alignment with UAE law. Any form of harassment, bullying, intimidation, abuse, or inappropriate conduct is strictly prohibited. This applies to interactions with colleagues, managers, direct reports, clients, suppliers, partners, or any stakeholder - whether in the workplace, externally, or through digital platforms.

e7 maintains a zero-tolerance stance on harassment and abusive behaviour. Violations will be treated seriously and may result in disciplinary action, up to and including termination, in accordance with UAE law and e7 Group policy.

What is expected from you?

- a. Treat everyone with professionalism, dignity, and respect always.
- b. Do not engage in or tolerate harassment, bullying, discrimination, threats, humiliation, or abusive behaviour - verbal, physical, written, online, or visual.
- c. Maintain clear professional boundaries and conduct yourself appropriately.
- d. Use respectful and professional language in all communications, including email, messaging platforms, and social media.
- e. Be mindful of cultural sensitivities and UAE standards of behavior and representation.
- f. Speak up and report any harassment or inappropriate conduct you experience or witness. Reports made in good faith are protected and retaliation is strictly prohibited.

04. HEALTH & SAFETY



e7 is committed to providing a safe and healthy work environment and to complying with all applicable UAE health, safety, and environmental laws and regulations, including ADOSH requirements.

Our goal is **to achieve zero harm** to people, property, and the environment. Health and safety is a shared responsibility, and all employees, contractors, visitors, and third parties working on behalf of e7 are expected to comply with e7 health and safety requirements and site rules.

What is expected from you?

Personal Safety & Wellbeing

- a. Perform all work safely and in accordance with established safety procedures and protocols
- b. Use required personal protective equipment (PPE) correctly and ensure it is properly maintained
- c. Never work, or allow others to work, while impaired by alcohol, illegal drugs, or any substances that may affect judgment or performance
- d. Promptly report any work-related injuries, illnesses, or near misses, regardless of severity
- e. Participate in required safety training and emergency preparedness exercises

Hazard Prevention & Reporting

- a. Proactively identify and report potential hazards, unsafe conditions, or unsafe behaviours without fear of retaliation
- b. Stop work immediately and report the situation if you observe an imminent risk to health, safety, or the environment
- c. Cooperate fully with incident investigations and support the implementation of corrective actions share lessons learned to help prevent the recurrence of safety incidents.

Leadership & Influence

- a. Model safe behaviours and hold yourself and others accountable to e7 standards
- b. Encourage suppliers, contractors, and business partners to meet or exceed applicable health, safety, and environmental requirements
- c. Contribute ideas and suggestions to support the continuous improvement of e7's health, safety, and environmental practices.



05. ENVIRONMENT SOCIAL AND GOVERNANCE (ESG)

e7 Group is committed to responsible and sustainable business practices. These principles guide how we work, how we make decisions, and how we contribute to the UAE's broader sustainability agenda. ESG is embedded into the group's values and operations, and every employee plays a vital role in supporting these commitments.

5.1. Environmental Stewardship

e7 Group is committed to protecting the environment and ensuring its operations contribute positively to long-term sustainability. Employees are expected to support the group's environmental initiatives by adhering to environmental management systems, reducing waste, conserving resources, and promoting responsible use of materials. This includes complying with all relevant environmental laws, following internal environmental procedures, and contributing to continuous improvement in areas such as energy consumption, eco-design, and waste minimization.

Employees should remain mindful of how their daily work impacts the environment and seek opportunities to reduce negative effects wherever possible. By acting responsibly and encouraging sustainable practices within their teams and among external partners, employees help the group advance its environmental strategic objectives and uphold its commitment to environmental stewardship.



5.2. Social Responsibility

e7 Group prioritises the health, safety, and well-being of its employees and is committed to creating a fair, inclusive, and respectful workplace. Employees are expected to contribute to a culture where all individuals - regardless of gender, race, ethnicity, age, religion, or disability - are valued and treated with dignity. Upholding high standards of conduct, fostering respect, and supporting diversity and inclusion are essential responsibilities for everyone within the organisation.

Every employee is responsible for maintaining safe work practices, following health and safety protocols, and supporting initiatives that enhance employee development, community engagement, and Emiratisation. By embracing these principles, employees help strengthen e7 Group's ability to attract, retain, and develop talent, while contributing to the group's broader social impact objectives.

5.3. Governance and Ethical conduct

Strong governance is central to e7 Group's reputation and success. Employees are expected to uphold the highest standards of ethics, integrity, and transparency in their work. This includes complying with all legal and regulatory requirements, following internal policies, avoiding conflicts of interest, and safeguarding confidential and personal data.

Employees must not engage in or tolerate corruption, fraud, anti-competitive behaviour, or any actions that undermine the group's values or governance commitments. Adhering to proper controls, reporting concerns or violations, and promoting responsible conduct all contribute to maintaining trust with stakeholders and supporting the group's long-term governance objectives.

What is expected from you?

- a. Employees are expected to understand and uphold the organisation's Environmental, Social, and Governance (ESG) principles
- b. Employees are expected to integrate ESG considerations into their daily activities and decision-making. This means acting responsibly, following established policies and procedures, participating in sustainability initiatives, and raising concerns when something does not align with the group's values or ESG standards.
- c. Employees should remain informed about ESG policies, seek guidance when uncertain, and actively contribute to a culture of accountability and continuous improvement. By doing so, every employee helps strengthen the group's ESG performance and contributes to achieving its environmental, social, and governance strategic objectives.

06. HOW TO PROTECT OUR REPUTATION

6.1. External Communications

e7's reputation is one of our most valuable assets. Every interaction with external stakeholders, including media, partners, clients, suppliers, and the public, has the potential to strengthen or damage our reputation.

Any publication of information, public statement, or external representation of e7 or its companies must be approved, coordinated, and issued by authorized personnel to ensure accuracy, consistency, and alignment with e7's strategic positioning.

What is expected from you?

- a. Act responsibly at all times and refrain from any communication that could reasonably harm the reputation of e7.
- b. Do not speak on behalf of e7 or release any information externally, including to media, partners, or public forums. All external communications must be reviewed and approved by the e7 Communications Department.
- c. Protect confidential information and do not disclose or reference any non-public, sensitive, or confidential e7 information in external communications or on social media (refer to the "Confidential Information" section for details).
- d. Follow Brand and Communication Guidelines when posting content on professional platforms. All content must comply with e7's communications policies and brand guidelines, available from the Communications Department.
- e. If you are unsure whether a communication is appropriate or permitted, contact the Communications team before acting. Seek guidance when in doubt.



07. HOW TO PROTECT OUR ASSETS

7.1. Safeguarding company assets

e7's assets (including but not limited to its fixed assets, financial resources, equipment, or materials) have been entrusted to Employees to enable achievement of business goals.

Everyone who holds, controls, manages, or supervises company assets has a duty to care for them while maximizing the efficiency of their use to the benefit of e7 and its stakeholders.

What is expected from you?

- a. Protect company assets, safeguarding them from loss, damage, theft and improper or illegal use.
- b. Make sure you use the assets in line with their purpose and for the benefit of the company.
- c. Protect sensitive assets and information from third party
- d. Be aware that the time we spend at work is also an asset for e7. Make sure you always give your best and spend the time at work efficiently and effectively to the benefit of the company.
- e. Do not dispose of company assets without having the appropriate authorization to do so.
- f. Comply with all security policies and procedures to ensure protecting the company assets.
- g. Ensure full and transparent documentation supporting any costs and expenses.
- h. Do not engage in unnecessary, extravagant, or improperly approved purchases.
- i. Minimize the use of company assets for personal purposes and exercise proper judgement if you need do it.
- j. Report any security gaps you become aware of.



7.2. IT Resources and cybersecurity

IT resources are critical in today's digitalized world, and their safe operations enable us to meet our business objectives. All persons utilizing, supervising, or having access to e7 IT resources have the responsibility to protect them and use them responsibly for company business purposes.

What is expected from you?

- a. Use the company's IT resources for authorized business purposes in line with the law and internal policies and procedures.
- b. Be aware that any communication or files you create, send, download or store using company IT resources (computers, phones, mobile devices etc.) is considered company property and may be subject to monitoring and / or compliance investigations.
- c. Never utilize the company's IT resources to engage in inappropriate communication (including sharing offensive materials or chain letters) or to access web content that is offensive or obscene.
- d. Respect the licensing requirements of IT software, including the tools and applications that have been made available for your company's business use.
- e. Do not try to download or install any files of software from unknown sources, or that might cause endanger the IT security of the company. Always use proper judgement and contact your IT team in case of questions.
- f. Protect your authentication credentials and change them as required by the relevant IT policies and procedures. This includes not sharing system credentials even with members of same team.
- g. Minimize the usage of company IT resources for personal use and exercise good judgement if you need do it.
- h. Be aware of cybersecurity threats (e.g., viruses / trojans, hacking attempts, phishing, password leaks) and comply with all IT security requirements in the company. Report any unusual activity or suspected IT risks to your IT team immediately.
- i. Do not use information and communications technologies, including networks, to carry out hostile activities or acts of aggression, pose threats to national peace and security, or proliferate information regarding weapons or related technologies.
- j. Comply with all applicable IT and security policies.



7.3. Intellectual Property

Intellectual property (“IP”) is another asset subset that encompasses our creations, inventions, and technology, which may give e7 strategic advantage in the market.

IP includes our copyrights, know-how, patents, trademarks, and trade secrets. We should protect our intellectual property as well as any IP of third parties in use at e7. Failure to do so may result in legal disputes or fines as well as reputational damage.

What is expected from you?

- a. Be aware of the Intellectual Property you have access to and use while working in e7, including both our own as well as third party Intellectual Property. As a rule, the Intellectual Property you create while working for e7 belongs to e7.
- b. If you create or supervise Intellectual Property in e7 make sure you always introduce appropriate legal measures to protect it, including introducing copyrights, patents, trademarks or ensuring that the third parties having access to it are subject to relevant Non-Disclosure Agreements.
- c. Consult with your Legal team if you have questions regarding the appropriate measure to apply in a specific situation.
- d. Never use any third-party Intellectual Property without the proper authorization to do so. Once obtained, make sure you respect the conditions of that authorization.
- e. Always follow the relevant security measures and requirements in line with your company physical access and IT and security policy.



7.4. Confidential Information

Confidential information refers to any type of information that e7 chooses not to make public. When working for, with or representing e7 you may have access to different types of confidential information, including business strategy, business plans, databases, intellectual property, information regarding mergers and acquisitions, proprietary data, process details, personal data, financial information, management changes, technical specifications, pricing proposals, or other business information.

Protection and processing of data is also subject to various laws and regulations (including international laws that may have an impact on e7). You must always respect and protect the confidential information of e7.

What is expected from you?

- a. Know what confidential information you have access to. Share the information only when having the appropriate authorization to do so and solely on a “need to know” basis and only with Employees, who require it to perform their duties at e7.
- b. Protect e7’s confidential information at all times, including outside the workplace and working hours. Never leave confidential information unattended, in particular if it may be accessed by third parties. Maintain a “clean desk” policy and keep any confidential information under lock and key after your working day. Immediately report any loss, unauthorized use or unintended disclosure of confidential information to your Legal or Compliance team.
- c. Never discuss confidential information with third parties without signed non-disclosure agreements and / or confidentiality clauses in the relevant agreements.
- d. Do not seek access to third party confidential information. If you receive or gain access to confidential third-party information which you clearly should not have, immediately consult your Legal team.
- e. Retain or discard records only in accordance with any internal record retention policies. In this regard, do not dispose of any records that are subject to a legal hold notice, even if they exceed the required retention periods.



7.5. Personal Data

Personal Data is any data that can directly or indirectly identify a person, such as Name, voice, picture, identification numbers (e.g., passport, ID), Online identifiers (e.g., IP address), Geographic location amongst others. The Protection and processing of data is also subject to various laws and regulations (including international laws that may have an impact on e7).

What is expected from you?

- a. As an e7 employee you are expected to exercise full diligence while handling personal data that you might need in the scope of your role.
- b. Do not disclose any personal data unless you are legally permitted to do so.
- c. If you are unsure whether you are permitted to process certain personal data, ask Compliance or Legal department.
- d. Do not transfer any personal data to different jurisdictions without obtaining guidance from the Compliance or Legal function.



7.6. Records, documents and controls

Management of business documentation, including all paper and electronic records, is crucial for e7. Policies and procedures form the basic framework in which we operate.

These documents, along with the appropriate Delegations of Authority, support the existence of internal controls, which define the responsibilities of individuals and their authorization to engage in specific business operations.

They also support us in maintaining compliance with laws, regulations, and reporting requirements. It is everyone's responsibility, including parties working with or representing e7, to ensure integrity of our internal controls and documentation.

What is expected from you?

- a. Comply with all applicable regulations concerning integrity, accuracy and timeliness of recording and reporting of financial and non-financial information. Follow any internal policies and procedures which relate to this subject.
- b. Follow the relevant Delegation of Authority and the requirements of the company's internal controls. Never act outside your authorization or circumvent / ignore the requirements of internal controls. Immediately report any potential weaknesses of internal control to your Finance, Legal or Compliance representatives.
- c. Prior to signing or approving any document, make sure you verify its accuracy and correctness, irrespective of the number of other, previous signatures it already contains.
- d. Appropriately manage all documents in your area responsibility from the moment of their creation to their disposal. Follow any related restrictions, policies and procedures related to protection, retention, and disposal of documents, especially those subject to litigation, financial scrutiny, audits or investigations.
- e. Never engage in any illicit activity concerning e7's documents and records, including any unauthorized document alteration or destruction. Report any concerns related to integrity of documents to your Finance, Legal or Compliance representatives.
- f. Cooperate fully and transparently with any internal or external auditors, investigators, or compliance experts.

7.7. Accounting & Reporting

The integrity of e7's accounting and financial reporting is fundamental to sound decision-making, regulatory compliance, and stakeholder trust. All accounting and reporting must present a true and fair view of the Group's financial position and performance.

All transactions must be recorded in accordance with International Financial Reporting Standards (IFRS), applicable laws, and e7's accounting policies, and must be supported by appropriate documentation.

What is expected from you?

- a. Record transactions accurately, completely, and in the correct accounting period.
- b. Comply with IFRS, statutory requirements, and group accounting policies at all times.
- c. Do not manipulate results, smooth earnings, or misstate financial performance for any reason.
- d. Do not delay, accelerate, or omit transactions to influence reported results.
- e. Complete month-end, quarter-end, and year-end closing activities in a timely and disciplined manner.
- f. Escalate any accounting concerns, errors, or uncertainties to Group Finance or Compliance.
- g. Cooperate fully with Internal Audit, External Audit, ARC, ADAA, and regulators.



7.8. Anti-Fraud

Fraud is any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. Dishonest or fraudulent activities include, but are not limited to, the following:

Forgery or alteration of documents (checks, bank draft, time sheets, invoices, agreements, etc.) or bank accounts belonging to the company or its subsidiaries;

- Misrepresentation of information on documents;
- Misappropriation of funds, supplies, or assets;
- Theft, disappearance, or destruction of assets;
- Improprieties in the handling or reporting of money or financial transactions;
- Authorizing or receiving payments for goods not received or services not performed; - Authorizing or receiving payment for hours not worked;

e7 Management is responsible for the detection and prevention of fraud and misappropriation. Each member of the Management responsible to report any potential instance of fraud or corruption to e7 Compliance, immediately. e7 Management shall ensure detection and prevention of fraud by establishing procedures, checks and controls to prevent fraud and detect fraud as and when it occurs. In addition to the above, e7 Management will be responsible to:

- a. Continuously educate employees on fraud prevention,
- b. Create a culture whereby employees are encouraged to report any fraud or suspected fraud which comes to their knowledge, without any fear of victimization,
- c. Promote employee's awareness of ethical principles Contractual agreements with e7 will contain a provision prohibiting fraudulent or corruptive acts. e7 Counterparties including, Vendors, contractors, and suppliers must be active, in good standing, and authorized to transact business in their respective country. e7 Counterparties are subject to Due Diligence & Sanctions screening

08. HOW TO CONDUCT BUSINESS EXTERNALLY



8.1. Anti bribery and Corruption

e7 takes a zero-tolerance approach to Bribery, Corruption, and Fraud. e7 is committed to acting professionally, and with integrity in all its business dealings and relationships. This implies to comply with all applicable local and international anti-bribery legislation and conduct our business transparently. These obligations extend to any third parties acting in cooperation or on behalf of e7 (e.g., agents, consultants, brokers).

What is expected from you?

- a. Never engage in any corrupt practices or offer, solicit, give, or receive any improper payments or bribes, either directly or indirectly (i.e., by involving a third-party intermediary).
- b. Never offer or accept any Facilitation Payments.
- c. Never accept any inappropriate / excessive Gifts, Hospitality and Entertainment (GHE), whether in cash, in-kind or otherwise.
- d. Never accept any GHE that could appear to influence your objectivity.
- e. Make sure you keep accurate records, books and documents reflecting your business activities, including any payments made to third parties.
- f. Conduct appropriate due diligence to ensure that e7 works only with reputable and ethical third parties (including agents, consultants, and brokers).
- g. Monitor the activity of third parties representing e7 and be alert to any signs of inappropriate practices.
- h. Immediately report any suspected Bribery or Corruption to your Compliance or Legal representative or using the other Whistleblowing channels available in e7 (please refer to "[How to report concerns?](#)" section).

8.2. Gifts, Hospitality and Entertainment (GHE)

Giving and receiving gifts, entertainment, and hospitality may be supported to foster healthy business relations. However, these should only happen when the gifting is an appropriate and transparent process without any corrupt intent or purpose.

Any Gifts, Hospitality & Entertainment (GHE) should meet the following requirements:

- a. It is offered as an act of appreciation or common courtesy associated with normal business practice.
- b. It is not intended to induce any improper conduct or influence the actions of an official, or other person in charge of a public or legal duty;
- c. Its nature is appropriate to the relationship;
- d. It is not provided during a sensitive business period (e.g. during a tender or negotiations involving the counterparty);
- e. It does not place the third party, employee, or e7 under any obligation or expectation of returning a benefit;
- f. It is offered publicly; not secretly and/or in an undocumented way;
- g. It is not linked with an exchange of any cash or cash equivalents; and
- h. Its value is in accordance with normal business practice.

What is expected from you?

- a. Before offering any GHE to third parties make sure you understand the recipient's gift policies, so that you do not breach any rules and / or place them in an uncomfortable situation.
- b. Comply with all applicable compliance policies and procedures in your company regarding gifts, including any requirements to obtain gift approvals and / or gift registration.
- c. Never accept or offer any GHE with corrupt intent or with the expectation of a return benefit. If you encounter any such instance, please notify your Compliance or Legal representative immediately.
- d. Never offer any GHE to Public Officials, without obtaining the required pre-approvals as per e7's policies. Please be aware that offering GHE to Public Officials might not only be inappropriate, but also illegal.

8.3. Working with 3rd Parties

Business relationships with external parties (such as suppliers, consultants, customers, etc.) are established to support e7 in managing its activities efficiently and effectively. The selection of these external parties to become e7 Suppliers is based on fair and transparent procurement processes.

Any third parties working with e7 should respect the applicable laws, regulations, and compliance standards, including the ethical principles set out in this Code of Conduct.

What is expected from you?

- a. Comply with all applicable procurement and compliance policies and procedures.
- b. If you participate in procurement processes, make sure that these are fair and transparent and free of any conflict of interest (please refer to "[Conflicts of Interest](#)" section).
- c. Select suppliers on the basis of merit and competitiveness.
- d. Conduct adequate due diligence to make sure we work with reputable and ethical third parties, who are committed to following the principles of e7's Code and all the relevant laws and regulations.
- e. Respect the relevant procurement laws and regulations, including any applicable international trade and sanction legislation (please refer to "[International Trade laws](#)" section).
- f. Ensure appropriate approvals prior to engaging in cooperation with any third parties.
- g. Protect e7's and the third party's confidential information.



8.4. Working with Public Officials

There are numerous, strict legal requirements which apply when working with government representatives, i.e. Public Officials. Public Officials include officers or employees of a government or any of its departments, agencies, or enterprises.

These requirements include both local and international legislation, which may apply to e7 due to our dealings with international partners. Therefore, e7's interactions with Public Officials need to always be transparent and in line with legal requirements.

In some jurisdictions, e7 Employees may be treated as Public Officials due to the group ownership.

What is expected from you?

- a. Understand the definition of a Public Official and always be aware when you are interacting with such persons.
- b. Always provide accurate and complete information to any government agencies or representatives.
- c. Never offer or provide any gifts, hospitality or entertainment to Public Officials without following the appropriate pre-approval process (please refer to "**Anti-Corruption and Business Ethics**" policy for more details).
- d. Immediately notify Compliance if you receive any unusual governmental requests for information and data, or if you are contacted about any non-routine governmental control.
- e. Ensure that any governmental requirements communicated to e7 are passed on to third parties working with us and that these requirements are also followed by the third parties.
- f. Represent e7 in an appropriate and professional manner, always keeping your business dealings transparent and in line with the letter of the law. If you are not sure if the activity you engage in complies with the regulations, contact the Compliance team.
- g. Contact Compliance team to clarify any questions in relation to working with the government or Public Officials.



8.5. Conflicts of Interest

A Conflict of Interest occurs when an employee has a personal or external interest or relationship that can affect the decision-making professional duties on behalf of e7.

Financial business, social relationships and/or sideline activities (including board positions) can give rise to potential conflicts of interest and shall therefore be handled accordingly.

All conflicts (or potential) of interest should be disclosed and reviewed by your Line Manager and HR in line with Anti-Corruption and Business Ethics Policy.

What is expected from you?

- a. Understand and be able to identify potential, perceived or actual Conflicts of Interest.
- b. Avoid potential, perceived or actual Conflicts of Interest whenever possible.
- c. Disclose any potential, perceived and actual Conflict of Interest to Line Manager and register the same on ESS. Please refer to **Anti-Corruption and Business Ethics Policy** for further handling.
- d. Manage Conflicts of Interest as per the recommendations provided by your Line Manager and HR.
- e. Seek guidance from Compliance Department if you are not sure whether your action would lead to a potential, perceived or actual Conflict of Interest.



8.6. Competition Laws

Laws and regulations which relate to unfair competition and antitrust may result in severe penalties for the companies as well as individuals who are found breaching them. Some of these laws, despite their international application, may also cover the activities of companies in the UAE.

You need to ensure that e7's activities are in full compliance with the relevant laws and appropriately address any risk of breaching them.

What is expected from you?

- a. Make sure you understand the scope and specific requirements of the competition laws that apply to your business operations. When in doubt reach out to your Legal or Compliance team.
- b. Do not engage in any agreements or activities that limit fair competition, including but not limited to price fixing, dividing territories, dumping, or undercutting.
- c. Do not undertake activities to unethically or illegally impact the activities of our competitors; for example, by issuing false statements, misusing trade secrets or other intellectual property, or inducing third parties to break their contracts with competition.
- d. Comply with any relevant laws which may concern the required pre-clearance of acquisitions or joint ventures.
- e. Be very careful not to share or discuss any competitive information with competitors, including business strategies, pricing frameworks, market shares, production, or service levels, etc.



8.7. International Trade Laws

The trade laws and regulations impacting e7 are very complex and strict. These include both domestic and international legislation that concerns importing and exporting of goods and services, additional export controls concerning specific types of goods and services (e.g., dual use goods), or restrictions concerning direct or indirect dealings with selected countries, entities and individuals. Non-compliance with these requirements may lead to significant fines and reputational losses for e7.

What is expected from you?

- a. Make sure you understand the scope and specific requirements of the trade laws displayed in the Sanctions & Trade Compliance Policy, that apply to your business operations. When in doubt reach out to your Legal or Compliance team.
- b. Get to know your business partners, customers, and suppliers by performing adequate due diligence (and enhanced due diligence whenever necessary) to avoid dealing with territories, entities or individuals, who are subject to trade sanctions, embargoes or other types of restrictions.
- c. Understand the technology, goods, services and technical information you are dealing in to identify any requirements related to their sale, export or transfer, especially if any of the technology is subject to any dual use goods regulations (i.e. regulations concerning technology that may have both peaceful and military use).
- d. Remember that international trade laws apply to both direct and indirect dealings. Make sure that any agents, brokers, and representatives of e7 understand their responsibilities and comply with the relevant laws.
- e. Be careful when discussing or sending any know-how or information (verbally and/or electronic channels). Such exchange may also be subject to international trade laws.
- f. Maintain all records of all trade, in particular import and export transactions, including due diligence results, purchase orders, agreements, invoices and payment information.
- g. Comply with any additional procurement, legal and compliance policies and procedures concerning international trade, due diligence, and sanctions compliance.
- h. Immediately inform e7's Legal and Compliance functions if you suspect any potential breach of international trade regulations, or, upon becoming aware of any claim, providing them with details of formal notice or investigation concerning international trade and sanction regulations involving e7 or any of its parts.

8.8. Insider Trading

Insider trading is the process of buying, holding, or selling of a publicly traded investment/security by someone who has non-public information about that security. By working for or with e7 you may acquire such non-public information (i.e., “inside” information) and through it gain an unfair advantage versus other market players.

Trading activities of insiders are strictly regulated and breaching these requirements, that is using the “inside” information for trade (either directly or by cooperating with others), is illegal. It may also have a detrimental effect on investor confidence and as a result negatively reflect on e7.

What is expected from you?

- a. Never engage in any trading activity in breach of insider trading rules and regulations.
- b. Do not disclose, use, or allow other to use insider information related to e7, its companies or any other third parties, obtained while performing your job or service requirements with e7.
- c. Be aware that discussing or sharing any confidential non-public information to a close family member, friends or anyone else is also prohibited.
- d. Comply with any additional e7 policies and procedures concerning capital markets and insider trading.
- e. Be aware of potential, perceived or actual conflicts of interest that may arise due to your access to confidential and insider information.
- f. When in doubt seek guidance from your relevant company functions, including the Legal or Compliance team.



8.9. Anti Money Laundering (AML)

Money laundering is the processing of criminal proceeds to disguise their illegal origin. Criminals do this by disguising the sources, engaging in various transactions, changing the form, or moving the funds to a place where they are less likely to attract attention.

e7 is committed to compliance with relevant anti-money laundering regulations and conducting business with reputable partners using funds from legitimate sources.

What is expected from you?

- a. Conduct thorough due diligence processes to know your customers, partners, and suppliers. Perform enhanced due diligence if you identify any red flags (i.e. indications of suspected wrongdoing).
- b. Co-operate with reputable partners and engage in transparent business transactions only.
- c. Understand the origin of the funds used in your company transactions and report any irregular or suspicious activity, including but not limited to:
 - d. Third parties resisting due diligence or providing inconsistent / incorrect information.
 - e. Any unusual or large cash payments from third parties not subject to due diligence;
 - f. Overpayment for goods and services followed by a refund request;
 - g. Purchases of goods or services inconsistent with the business profile of the partner;
 - h. Any requests to redirect funds into bank accounts of third parties;
 - i. Transactions originating from or directed into countries not directly linked with the business partner or countries subject to any sanctions or embargoes.
- j. Follow any additional guidance, policies and procedures released by your company in relation to due diligence, sanction compliance and AML.
- k. Contact your Legal or Compliance team if you have any concerns or questions about money laundering.

8.10. Specific sector and industry regulations

e7 companies may be subject to laws and regulations specific to our business sector and industry. It is the responsibility of the company management teams, supported by Legal and Compliance functions, to recognize the specific requirements and ensure adequate resources allowing full adherence.

What is expected from you?

- a. Make sure you understand the scope and specific requirements of the industry laws and standards that apply to your business operations. When in doubt reach out to your Legal or Compliance team.
- b. Track the latest developments in compliance laws, regulations, and best practices. Stay ahead of the curve, set the best compliance standards in your industry when implementing them in your company.
- c. Work transparently and address any requests of your Regulators in a timely manner, providing them with all the required explanations and documentation.
- d. Interact with corporate e7 partners and fulfil your reporting requirements. Make sure to flag any significant compliance risks or challenges your business might be facing.
- e. If you identify any non-compliance risks related to your company's specific requirements report them immediately within your company for appropriate follow-up. You also have the possibility of escalating it to the attention of e7. Please refer to "[How to report concerns?](#)" section for more details.



09. SPEAK UP

9.1. How to report concerns?

e7 believes in and encourages a healthy “Speak Up” culture - to report any Code violation concerns or raising questions regarding the practical scope or application of the Code requirements.

There are several channels you can utilize to report any suspected Code violations. When deciding which channel to use, consideration should be given to the nature of the concern, the individuals involved, and the whistle-blower’s comfort level. We encourage you to reach out to your direct manager first.

However, if for any reason you are not comfortable with such a communication, you may refer to any other of the below options, in the order of listing:

- The person’s immediate manager ;
- The head of department;
- **Compliance Director**
- Head of Internal Audit or General Counsel;
- **External hotline** system available via phone or website



9.2. Remarks about Speak Up Process

You should promptly report any suspected or potential wrongdoing you believe has taken place, is taking place or will take place. Lack of speaking up if you are aware of a possible Code violation may be considered a breach of the Code itself.

e7 encourages the reporting of any Code concerns directly and openly. It is also possible to report a concern anonymously; however, anonymous reporting may make any investigation more complex and may prevent appropriate action being taken.

Stakeholders are asked to submit reports of concerns to e7 via Speakup@e7group.ae, without making any form of public or private statements, unless required to do so by law.

e7 takes all reports of potential Code violations seriously and is committed to conduct investigation and verification of all allegations as required in given circumstances.

Whether anonymous or not, all reports will be handled in a confidential manner. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation of the concern and to implement any subsequent corrective and/or remedial measures.

We expect stakeholders to report concerns in good faith and will not tolerate intentionally false reports or reports made through malice. Making a report in good faith means you will be protected against retaliation. If a stakeholder reports a concern that he/she knows or reasonably should know to be false, he/she will be subject to disciplinary action and / or repercussions leading to civil or criminal prosecution.

Any whistle-blower who reports a concern, which the whistle-blower reasonably believes, or may reasonably believe to be true, will be afforded protection for such reporting. This protection means that e7 will not discharge, demote, suspend, threaten, harass or in any manner discriminate against the whistle-blower in the terms and conditions of employment or contract for raising a concern or cooperating with an investigation.

e7 does not tolerate any form of threat, retaliation or other action against a whistle-blower who has made or assisted in the making of a report of a Concern. Any such threat, retaliation or other action should immediately be reported to the Compliance Director.

10. DEFINITIONS

ARC: e7's Audit and Risk Committee

Bribery: Bribery is the act of offering, giving, receiving or soliciting money, a favour, or anything of value to influence the judgement, conduct, official act or business decision of a position of trust. Bribes can be in many forms including but not limited to facilitation payments, gifts, entertainment and charitable giving which typically involve corrupt intent. A kickback is a type of bribe in which a person usually gets a favourable financial, commercial or business benefit/ in return for granting a contract or subcontract.

Conflict of Interest: Conflict of interest is a situation in which a person has a competing professional or personal interest. Such competing interests can make it difficult to fulfil his or her duties impartially

Close family member: Father, mother, brother, sister, children, spouse, father-in-law, mother-in-law, and children of the spouse

Compliance Function: e7's compliance team, led by the Compliance Manager, reporting administratively to the GCEO and having direct access to the ARC.

Compliance Minimum Standards: A set of portfolio-wide guidelines defined by the Compliance Function which define standards to be applied for key areas of Compliance Related Matters including (but not limited to) governance, anti-bribery, conflicts of interest, whistleblowing, corporate investigations, data privacy, risk management, sanctions.

Compliance Related Matters: Applicable requirements with respect to corporate compliance including ethical standards, conflicts of interest, confidentiality of information, whistleblowing / internal investigations, anti-bribery & corruption, sanctions, third party due diligence, fraud risks and other compliance areas as defined by the ARC.

Corruption: Corruption is a dishonest action or abuse of one's duties or power for private gain.

Typical forms of corruption include giving or accepting bribes or inappropriate gifts, illegal gratuities, double-dealing, under-the-table transactions, economic extortion and undisclosed Conflict of Interests.

Employee: e7's full-time and part-time employees including Senior Management, as well as any other person that has been issued an e7 Employee ID number, (including but not limited to temporary agency staff, interns and/or trainees).

GCEO: e7's Chief Executive Officer

Facilitation Payment: A form of bribery made for expediting or facilitating the performance of a Public Official in a routine governmental action. For example, payments made for expediting processing papers, permits and other actions conducted by an official.

Stakeholders: e7 officers, directors, senior managers, managers, Employees (part or full time), Board and Board Sub-committees, contractors, suppliers, vendors, temporary employees, interns, suppliers, vendors, agents, and other third parties

Subsidiary: An entity where e7 has 50% or more shares or has management control

Whistleblowing: The act of escalates a concern or makes a complaint through the process defined within this Framework

Audit and Risk Committee (ARC): A sub-Committee, appointed by BOD, which has an oversight function over the financial reporting process and internal controls, compliance, Internal audit and risk management

ADAA: Abu Dhabi Accountability Authority

Case, Concern or/and Complaint: Any allegation raised concerning an actual or suspected event of breaching e7 Group’s Code of Conduct and Business ethics, including asset misappropriation, bribery/corruption, fraud, money laundering, theft, bullying, harassment, discrimination, information security, unprofessional/unethical conduct, or any other non-compliance incidents or breaches of other e7 Group company policies

Disciplinary Action: An action taken against a recipient to alert, correct behaviours, or/and deter the recipient from future instances of misconduct, violation, or issues. Disciplinary Action can range from coaching to loss of employment. Disciplinary Actions are delivered to recipients generally in alignment with the respective Business Leader, HR, Compliance and Legal

Employee Grievance: Any concerns raised by e7 Group employees regarding decisions or actions taken by other e7 Group employees, which the reporting employee believes to be either unfair, incorrect, or in violation of their agreement with e7 Group. Examples include (but are not limited to): Employee assessments; Promotions; Salary disputes; Terms and conditions of employment (working hours, workload, annual leave days, compensation etc.)

Evidence: Refer to all information contained or stored in any location, at work or at home, whether in paper or electronic format, that relate in any way to an Investigation. It includes letters, emails, electronic documents, instant messages, text messages, voicemail, faxes, memoranda, contracts, notes, calendars, voicemails, videotapes, meeting minutes or reports, business and strategic plans, PowerPoint presentations, internet data sites, financial reports, operational projections and results, drawings, graphs, charts, photographs, recordings, images, electronic databases and advertising or promotional materials

Public: Ordinary people in a society, who are not members of a particular organization or who do not have any special type of knowledge

Public Official: Any officer or member of a government or any department, agency, or instrumentality (i.e. entity or enterprise) thereof, or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organization.