

INFOTECH SERVICE FZ-LLC

CODE OF ETHICS

1. ETHICS GOVERNANCE AND ORGANIZATION

INFOTECH SERVICE FZ-LLC is committed to upholding the highest standards of ethical conduct in all its operations. The Group Compliance Officer is responsible for overseeing the implementation and enforcement of the Code of Ethics. Each Business Unit manager must ensure employees are trained and apply the code. Employees can seek guidance from the Group Compliance Officer or their direct manager when faced with ethical dilemmas. A whistleblower program allows employees to report concerns confidentially.

2. ETHICS KEY PRINCIPLES

INFOTECH SERVICE FZ-LLC is committed to integrity, transparency, honesty, and fairness. Every employee is expected to comply with local laws and regulations, and no performance objectives should encourage deviations from these ethical standards. In all situations, employees must act with honesty and avoid any conflict of interest. Any actions that could harm the reputation or trust placed in INFOTECH SERVICE FZ-LLC must be avoided.

3. ANTI-CORRUPTION POLICIES

INFOTECH SERVICE FZ-LLC has a zero-tolerance policy toward bribery and corrupt practices. Employees are prohibited from offering, promising, or giving anything of value in order to gain an improper advantage. Likewise, accepting bribes or kickbacks is strictly prohibited. All employees are required to comply with international and local anti-bribery and anti-corruption laws. Gifts, hospitality, and entertainment above a value of €150 must receive prior approval from the Group Compliance Officer.

4. CONFLICT OF INTEREST

Employees must avoid any situation where their personal interests could conflict with those of INFOTECH SERVICE FZ-LLC. This includes financial interests in competitors, suppliers, or clients, as well as offering employment to family members without prior approval. In case of doubt, employees should disclose any potential conflict to their manager or the Compliance Officer.

5. GIFTS, HOSPITALITY, AND ENTERTAINMENT

No employee shall accept gifts, hospitality, or entertainment that could improperly influence business

decisions. Gifts valued above €150 must be reported and approved. In situations where a gift cannot be refused, it must be donated to charity or reported for further guidance. Offering gifts or entertainment with the intention of influencing a decision is also prohibited.

6. DEALING WITH THIRD PARTIES

INFOTECH SERVICE FZ-LLC requires due diligence when working with subcontractors, agents, and suppliers. All third-party relationships must be in compliance with the Code of Ethics and local laws. Employees are responsible for monitoring third-party conduct to ensure it aligns with INFOTECH SERVICE FZ-LLC's ethical standards. Any unusual financial arrangements or potential ethical violations must be reported to the Compliance Officer.