

INFOTECH SERVICE FZ-LLC Business Partner Code of Conduct (BPCC) - March 2024

Core Principles

- Integrity: All business is to be conducted with honesty and ethical responsibility.
- **Sustainability:** Ensuring business practices are sustainable and environmentally conscious.
- Safety: A commitment to workplace safety and health.

Scope of Application

- The BPCC applies to all business partners, including suppliers, service providers, contractors, and joint-venture partners, who work with INFOTECH SERVICE FZ-LLC.
- Business Partners must either comply with the BPCC directly or demonstrate equivalent principles through their compliance programs.

Compliance Expectations

- Business partners are expected to agree in writing to the BPCC or provide evidence of a compliance program.
- Compliance must be demonstrated through self-assessments, and non-compliance may lead to corrective actions, including the termination of the relationship.

Key Areas Covered

1. Anti-Bribery and Corruption:

- o Zero tolerance for bribery, kickbacks, and improper inducements.
- o Compliance with local and international anti-corruption laws is mandatory.

2. Conflicts of Interest:

 Business partners must avoid situations where personal interests conflict with the business interests of INFOTECH SERVICE FZ-LLC.

3. Economic Sanctions and Anti-Money Laundering:

 Business partners must comply with international sanctions, export control laws, and anti-money laundering regulations.

4. Privacy and Data Security:

 Strict adherence to personal data protection laws is required, and business partners must implement appropriate security measures.

5. Fair Competition:



 Business partners must engage in lawful and fair competition and comply with applicable anti-trust laws.

6. Intellectual Property and Confidentiality:

- o Respect and protection of intellectual property rights are mandatory.
- o Unauthorized disclosure of confidential information is prohibited.

7. Environmental Protection:

 Business partners are expected to take proactive steps to protect the environment and reduce their environmental impact.

8. Human Rights:

 Business partners must respect human rights, prohibit child and forced labor, support freedom of association, and provide non-discriminatory workplaces.

9. Health and Safety:

 Business partners must provide a safe and healthy work environment, adhering to all applicable health and safety regulations.

Enforcement

- Whistleblowing: INFOTECH SERVICE FZ-LLC encourages the reporting of any unethical behavior via an external ethics line.
- **Consequences for Non-Compliance:** Breaches of the BPCC may result in investigations, remediation requirements, or the termination of the business relationship.

Contacts

• Compliance Officer and Chief Sustainability Officer details are provided for reporting or queries related to the BPCC.

This document outlines the ethical, environmental, and legal standards expected from all business partners working with INFOTECH SERVICE FZ-LLC.