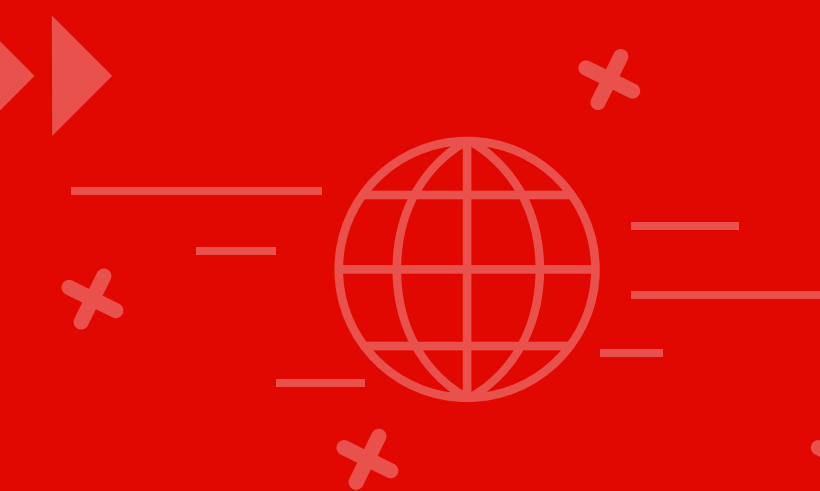
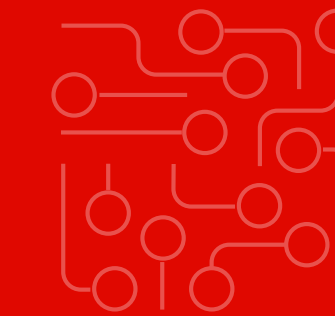
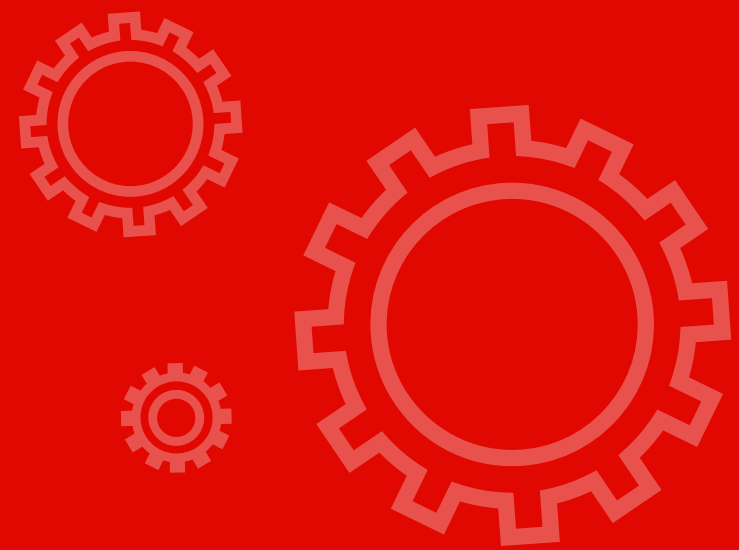




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e&'s Supplier Code of Ethical Conduct





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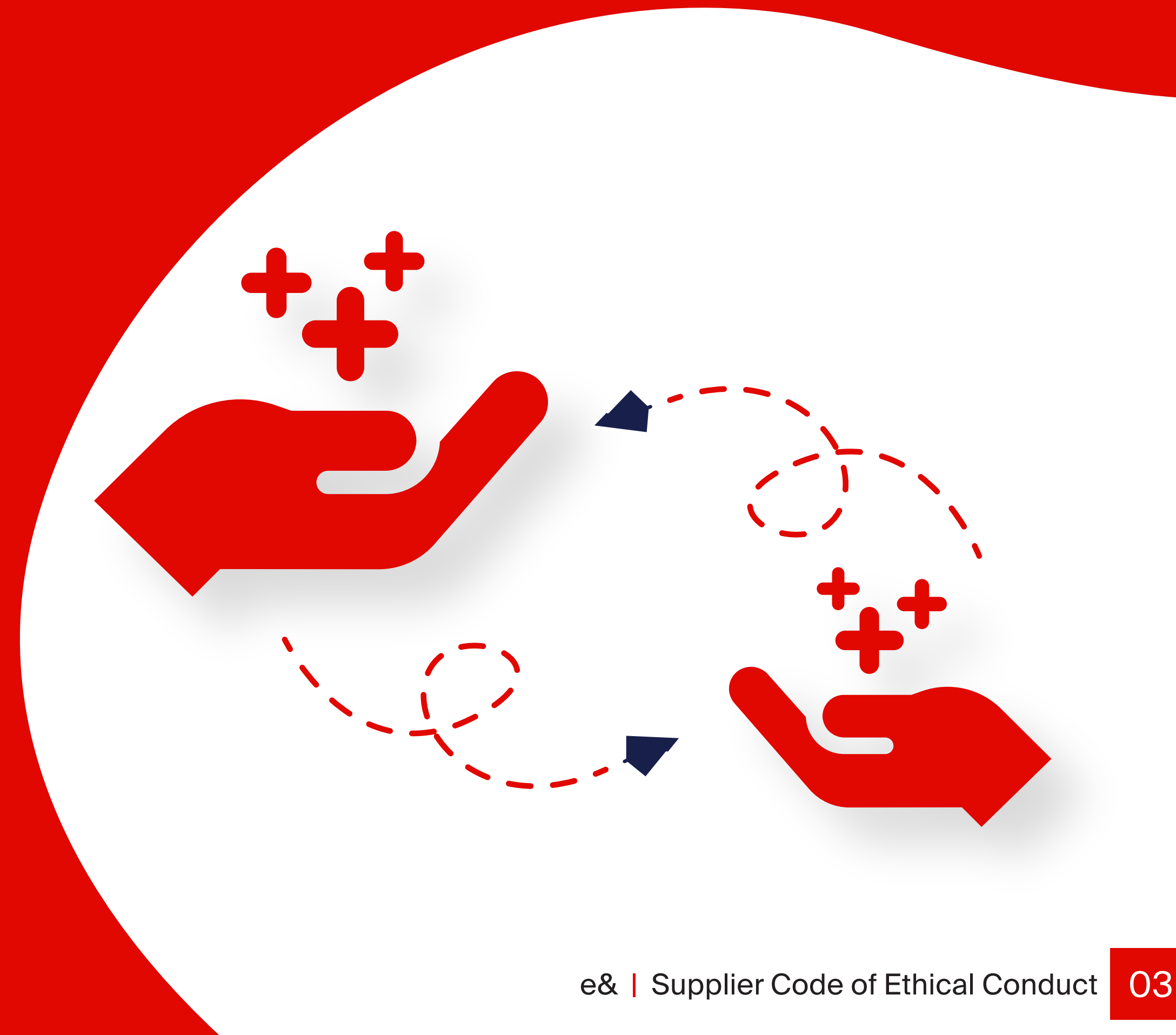


More impact. More responsibility. More progress.

We are committed to conducting business with integrity and transparency, while pushing ourselves to create deeper, more meaningful impact.

From our stakeholders and customers to the communities and environment around us, we go for more positive change today and for the future.

Go for more

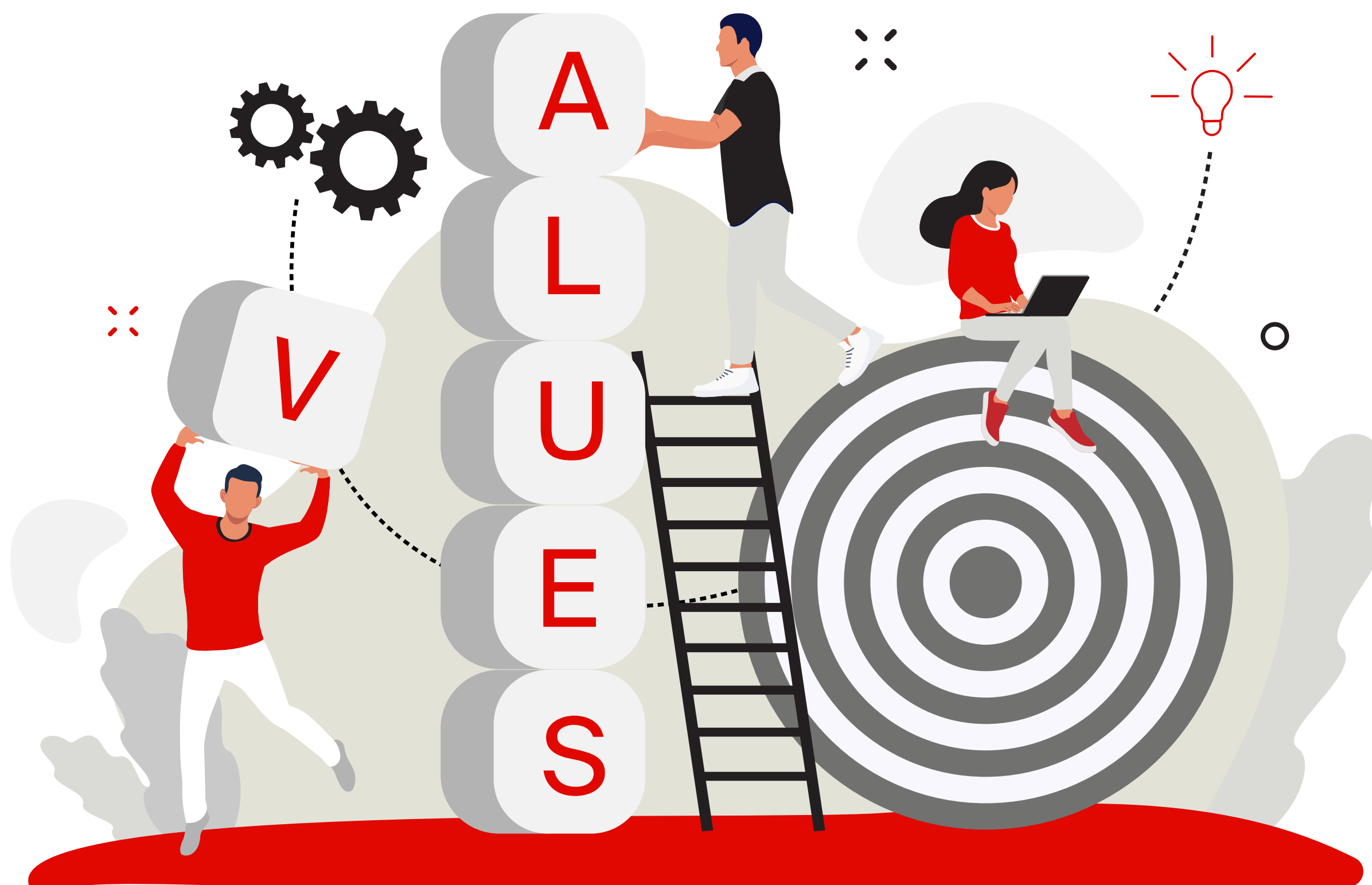


1 — Who does this apply to?

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.

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 Code sets out a Supplier's requirements in relation to compliance with anti-bribery, anti-corruption, conflict of interest, fair competition, labour & human rights, health & safety, environmental responsibility, data protection and any other sustainable product specific standards, and regulations and standards in the countries in which the Supplier operates. Suppliers are encouraged to align their practices with recognised international standards such as the UN Guiding Principles on Business and Human Rights.

This Code is reviewed periodically and updated as needed to reflect evolving international standards, regulatory requirements and industry best practices.



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 must acknowledge this Code during onboarding, renewal or contract submission. The acknowledgment of this Code is mandatory in every supply contract. e& reserves the right to verify adherence as part of its Supplier due diligence or renewal process.

The Supplier shall ensure it does not commence any work or activity on behalf of e& until it confirms it has read, understood and is committed to upholding all the principles set out in this Code.

4 — Supplier monitoring and management

As outlined in the UN Guiding Principles on Business and Human Rights, and the OECD Due Diligence Guidance for Responsible Business Conduct, the group is committed to responsible sourcing practices that uphold human rights, environmental sustainability and ethical conduct across our supply chain. These standards set e&'s minimum expectations of all our business partners.

The Supplier is expected to have policies and 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. This also includes management systems for risk assessments, training, performance measurement, accountability and documentation. e& is committed to engaging with Suppliers to encourage continuous improvement efforts in line with the requirements set out in this Code.

e& reserves the right to conduct announced or unannounced visits and/or have third-parties audit to ensure compliance with this Code and all applicable laws and regulations.

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





5 — Data protection, privacy, confidentiality and intellectual property rights

At e&, we highly value the privacy of our customers and partners. Suppliers must handle confidential information and personal data with the utmost care and comply with all applicable laws, including data protection laws and regulations, as further outlined in our Group Data Protection Policy. Suppliers must:

- Maintain secure processes for access, storage and processing of data
- Limit access to trained, authorised personnel for legitimate business purposes
- Not use the personal data to any other purpose different from the object of the agreement without prior authorisation from e&, including to train AI models or for anonymisation purposes
- Sign a Data Processing Agreement (DPA) with e& where required, mostly when personal data is processed
- Cooperate with e& in due diligence efforts, including audits or assessments
- Protect e& information from improper disclosure or misuse.
- Provide acknowledgment of e& Data Protection Policy and Intellectual Property Policy

Suppliers must also respect and protect e&'s intellectual property and know-how, avoiding any act or omission that could undermine these rights.



6 — Human rights

e& expects all Suppliers, contractors, subcontractors and business partners involved in providing goods or services to e& to conduct their operations in a manner consistent with our Human Rights Statement. e&'s human rights commitment and approach is informed by internationally recognised human rights as outlined in the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Children's Rights and Business Principles, and the UN Women's Empowerment Principles. Furthermore, e&'s approach to human rights is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs), and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Suppliers shall ensure fair treatment, safe working conditions and freedom from forced or child labour in line with applicable laws and recognised international principles.

Labour rights, social dialogue and freedom of association

e&'s approach to labour rights, social dialogue and freedom of association across our supply chain is informed by the ILO Declaration on Fundamental Principles and Rights at Work. e& is aware of the heightened human rights risk associated with the development and maintenance of telecommunications infrastructure, particularly in high-risk locations.

e& is committed to ensuring all contractors, outsourced employees and supply chain workers 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.

In countries where such rights are recognised, Suppliers shall ensure that all contractors, outsourced employees and supply chain workers, without distinction, have the right of association, union membership and collective bargaining. No retaliation may arise from the exercise of such right and no remuneration or payment whatsoever may be offered to the employees in order to hinder the exercise of such a right. Where restrictions exist, Suppliers shall provide alternative lawful mechanisms to enable social dialogue through worker representation, engagement and consultation on workplace matters.

Modern slavery and human trafficking

e& does not tolerate any form of modern slavery, forced labour or human trafficking. The group further prohibits all practices conducive to forced labour and modern slavery in our supply chain, and expects business partners to ensure compliance with local legislation informed by relevant international standards such as ILO Convention No. 29.

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.

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 communicate terms of employment to all workers in a language and format that is easily understandable to them. When paying wages, the Supplier shall pay wages in a timely manner and provide appropriate documentation such as pay slips. The Supplier must ensure that working hours, including overtime, comply with local and national labour

laws and are not excessive under any circumstances. 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.

Rights of the child

e& does not tolerate the use of child labour under any circumstances and 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.

In line with ILO Convention No. 138, the minimum age for full-time employment must be 15, or the legal minimum age for employment under applicable law, whichever is higher. Where the applicable local minimum working age is 14, in accordance with exceptions for developing countries covered under ILO Convention 138, this lower age will apply. All legal restrictions regarding the employment of persons below the age of 18 must be observed.

Younger workers may be employed through company-approved, short-term internships, apprenticeships or work experience programmes, so long as they do not interfere with their



physical or mental health or education.

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.

Conflict minerals

Suppliers engaged in manufacturing or procurement of materials are encouraged to source responsibly and avoid conflict-affected minerals, which include tin, tungsten, tantalum and gold (3TG), linked to armed-conflicts and related human rights risks. Suppliers engaged in manufacturing are expected to conduct their operations in a manner consistent with our Conflict Minerals Statement.

e& incorporates conflict minerals screening into our supplier evaluation and onboarding process. The Supplier is expected to exercise due diligence to reasonably assure that the minerals used within their supply chain are sourced responsibly, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. New suppliers are required to complete a self-attestation regarding the presence and sourcing of 3TG and cobalt in the products they source or manufacture. These requirements currently apply to suppliers linked to our UAE operations and will be rolled out globally at a later stage.

7 — Discrimination and digital inclusion

e& is committed to fostering a diverse, inclusive and respectful workplace where all individuals have equality of opportunity and are treated with dignity and respect. e& prohibits all forms of discrimination, harassment, humiliation, threats of violence and abusive or offensive behaviour. e& applies our internal standards listed in the Code of Conduct to ensure a safe and respectful environment for all employees and contractors and we require our business partners to do the same.

The Supplier shall not engage in, or support, any form of discrimination, directly or indirectly, 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.

The Supplier shall provide regular training to its workforce on anti-discrimination, diversity and unconscious bias. Suppliers are also encouraged to promote inclusion, diversity and digital accessibility in their workforce and operations.

e& is committed to developing and using AI applications responsibly and has established the e& Responsible AI Framework that guides AI development and deployment across the organisation. e& encourages its business partners to adhere to the principles set out in this Framework where relevant to the services and products rendered by the Supplier.





8 — Bribery and corruption

Globally, e& maintains a zero-tolerance approach to bribery and corruption aligned with the UN Convention against Corruption. The group prohibits the offering, giving, soliciting or receiving of any bribes such as cash, gifts, hospitality, facilitation payments or any other improper advantage both directly and through third parties, as governed by the Anti-Bribery & Anti-Corruption Policy.

The Supplier shall not engage in or offer, give, solicit or receive 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 subcontractors 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, solicit or receive 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 — Charitable contributions and responsible lobbying

e& does not make political donations in any jurisdiction and does not engage in charitable contributions outside of defined and approved CSR processes.

e&'s public policy engagement, where it occurs indirectly via industry associations, complies with internal policies. e& also takes steps to ensure transparency in how its external contributions and affiliations are reviewed and monitored and periodically reviews relationships to ensure consistency with its values, ESG commitments, and risk management expectations.

The Supplier shall act in accordance with all applicable laws in relation to public policy engagement and lobbying, ensure transparency, and consider ethical and reputational risks.



11 — Health and safety

The ILO Constitution requires that workers must be protected from sickness, disease and injury arising from their employment. e& is committed to providing a healthy and safe working environment, and promotes wellbeing to contractors, outsourced employees and supply chain workers as outlined in our Occupational Health and Safety Policy.

The Supplier shall ensure it provides a safe working environment for its employees and subcontractors in 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 implement an Occupational Health and Safety Management System in line with e& corporate requirements and aligned with ISO 45001 standards. Suppliers must also conduct periodic risk assessments, maintain emergency plans, ensure worker competency through training, report incidents promptly and ensure subcontractor compliance with all health and safety requirements. Additionally, suppliers are required to prioritise worker welfare by providing safe working conditions, access to basic amenities and ensuring fair treatment of all personnel.



Suppliers shall implement robust physical security measures within their operations or areas of responsibility to safeguard e&'s people, assets and infrastructure against unauthorised access, theft, vandalism or malicious acts. These measures should include, where applicable, perimeter control, surveillance systems, access restrictions and secure handling of sensitive materials. Suppliers operating at e& facilities must strictly comply with e&'s site-specific physical security protocols. Furthermore, subcontracted security personnel must be trained, qualified and vetted in accordance with applicable legal requirements and internal standards.

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&.



12 — Environment and climate change

The Supplier shall commit to enhance environmental sustainability practices in line with global standards and protocols. The Supplier shall, upon request by e&, demonstrate how it is minimising its use of finite resources (such as energy, water and raw materials), limiting the release of harmful emissions to the environment (including waste, polluting or hazardous air emissions and discharges to water), and facilitating nature and biodiversity conservation in the areas they operate or impact.

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.

Suppliers are required to operate under an Environmental Management System (EMS) that aligns with e& corporate requirements and complies with ISO 14001 standards. Suppliers must identify and mitigate environmental impacts, monitor performance indicators, prevent pollution, report significant environmental incidents, and ensure adherence to local and international environmental laws and regulations.



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. On request, Suppliers will, where feasible:

- Support e& by providing verified data on scope 1, 2 and 3 GHG emissions and sustainability progress including energy consumption for products and services provided to e&
- Provide updates on progress towards their own scope 1, 2 and 3 GHG emissions reduction targets (if in place)
- Provide other necessary certificates, reports highlighting suppliers' progress and improvement on various sustainability agenda like LEED certification, product ecolabelling, etc., where applicable

In line with e&'s other environmental sustainability priorities, wherever applicable, Suppliers are encouraged to adopt circular economy principles and minimise environmental impacts at all stages of the product life cycle – design, manufacturing, distribution, use, and end of life, where possible.

13 — 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. Suppliers and their employees will not face retaliation for reporting in good faith.

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 ethicsandcompliance@end.com, the official whistleblower line (+9718002002 or +9714377442) or email whistleblower@eand.com. All reports will be kept confidential to the extent it is practicable (except where disclosure is required by applicable law or court order). e& prohibits any form of retaliation against anyone who raises a complaint or question or participates in investigations as a response of any such complaints.



Related Policies

[e& Code of Conduct](#)

[e& Human Rights Statement](#)

[e& Corporate Social Responsibility Policy](#)

[e& Conflict Minerals Statement](#)

[e& Global Anti-Money Laundering and Countering Financing of Terrorism Policy](#)

[e& Occupational Health and Safety Policy](#)

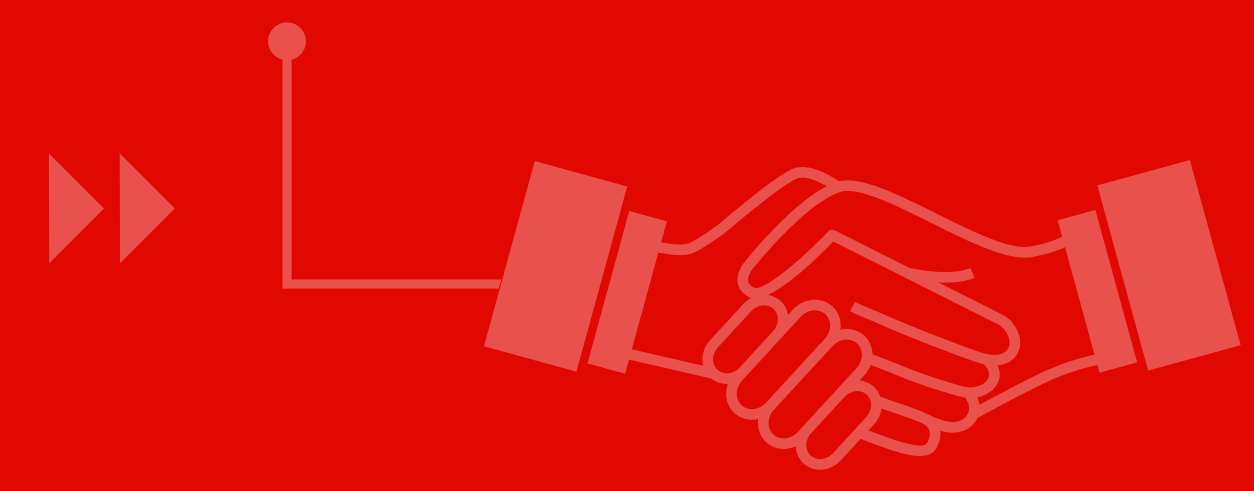
[e& Group Data Protection Policy](#)

[Anti-Bribery and Anti-Corruption Policy](#)

[Principles of the e& Responsible AI Framework](#)

[e& Occupational Health and Safety Policy](#)

e&'s Supplier Code of Ethical Conduct



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