

01.05.2017

Introducing Mubadala Ethics and Compliance Policies



The Mubadala Group Code of Conduct establishes the ethical standards that we all must uphold when working for and representing the Mubadala Group. It also provides the foundation for our Ethics & Compliance program. You must read the Code to understand what is required of you and how it impacts your work; it is your responsibility.

The Code covers how we maintain an ethical culture and ensure that we are doing the right thing, the right way. It covers many areas of ethical behavior including protecting the Mubadala Group reputation, appropriately interacting with third parties, and, importantly, reminds us that we must act with integrity and respect for everyone. It addresses proper business conduct, confidentiality, and how to speak up if something is not right. While the Code cannot cover every situation, our responsibility to act ethically, responsibly, and legally is always present, even if there is not specific guidance in the Code.

Where the Code is more high-level, our Group Compliance Policies cover specific areas in greater detail, but they must also be broad enough to apply to all of the industries and geographies in which we operate.

The Code and Compliance Policies are available on the Intranet, and we urge you to familiarize yourself with each document. Summaries of the Code and Compliance Policies are also available on the Ethics & Compliance Office smartphone application.

The key policies and their effective dates are set out in brief below:

1 May, 2017:

- **Code of Conduct:** establishes baseline standards for conduct. The Code cannot reflect all risks and is the starting point to understand what is expected and how to conduct business in an ethical and compliant manner
- **Helpline Policy:** sets forth the process that ensures your concerns are properly

managed and investigated by the Ethics & Compliance office

- **Anti-bribery & Corruption Policy:** provides rules and protocols to prevent bribery and corruption, and guidance on Gifts, Entertainment, Sponsorship, Sponsored travel, etc
- **Conflicts of Interest Policy:** provides guidance on recognizing and managing potential conflicts of interest situations and emphasizes the importance of not advancing one's own personal interests at the expense of the Mubadala Group
- **Securities Trading & Inside Information Policy:** provides guidance on the importance of protecting material confidential information related to publicly listed securities and prohibiting insider trading or stock tipping
- **Competition Law Policy:** provides guidance regarding how to conduct day-to-day activities without engaging in conduct that limits or restrains trade and/or a fair marketplace.

1 November, 2017:

- **International Trade Controls Policy:** provides guidance on establishing appropriate policies, procedures, and processes in response to specific jurisdictional and regulatory international trade requirements, such as sanctions and export / import controls

1 May, 2018:

- **Due Diligence Policy:** sets minimum expectations for gathering, analyzing, managing, and monitoring information about business partners
- **Data Privacy Policy:** sets minimum expectations for managing personal data
- **Information Management Policy:** defines the minimum requirements for each stage of the information life-cycle to enable employees to understand, manage, and protect information at all stages
- **Supplier Code:** sets forth minimum ethical expectations for our Mubadala Group suppliers to ensure our suppliers maintain ethical standards when conducting business and services on behalf of the Mubadala Group

The Code of Conduct and Supplier Code are public documents, however our Group Compliance Policies are confidential and should not be shared outside the Mubadala Group without prior approval from the Ethics & Compliance Office.

You can contact the Ethics & Compliance Office via the smartphone application, or contact the Ethics & Compliance Office at ethics@mubadala.ae, or at +971 2 413 3333.

Thank you for your ongoing commitment to doing the right thing, the right way; and remember, if you see it, say it.