

Mubadala Group Ethics & Compliance

Key Takeaways

What is our Code of Conduct?

The Code communicates the basic principles, standards, and behaviors expected across the Mubadala Group.

It makes clear that we not only follow the law, but also strive to adhere to the highest levels of ethics, integrity, and corporate responsibility. The Code applies to everyone who works directly for, or represents, the Mubadala Group, including employees, directors, contractors and consultants. Our suppliers are covered by the Mubadala Group Supplier Code, which sets the standards for their conduct.



What does the Code cover?

The Code covers what you do at work. It is supported by Mubadala Group policies and procedures. When you cannot find the answer, the Ethics & Compliance Office is always available to assist you.

The Code covers how we:



Treat one another



Avoid conflicts of interest



Handle business gifts and hospitality



Act as good stewards of our assets and resources



Manage intellectual property and confidential/non-public information



Work with business partners and governments



Navigate trade regulations and sanctions



Keep our work environments and community safe and sound

Where can I find the Code?



Ask your Ethics & Compliance Champion for a copy



Visit the Ethics & Compliance Office extranet or the home page on the intranet



Download the M-Ethics & Compliance app available on the iTunes App Store and Google Play Store

Where do I go with questions or concerns?



The Ethics & Compliance Office contact details:

Mubadala Investment Company PJSC
Ethics & Compliance Office
PO Box 45005, Abu Dhabi, United Arab Emirates

+971 2 413 3333

ethics@mubadala.ae

Ethics & Compliance Group Compliance Policies Overview

 <p>Anti-Bribery & Corruption</p>	<p>Establishes rules and protocols to prevent bribery and corruption. Mubadala Group personnel: (1) are prohibited from offering or receiving bribes; (2) are prohibited from making or facilitating payments; (3) may participate in legitimate business activities (e.g., entertainment, gifts, sponsorships, etc.) as long as they follow the rules; (4) must obtain pre-approval when required; and (5) must know their business partners and interact with them appropriately.</p>
 <p>Conflicts of Interest</p>	<p>Offers guidance to assist in recognizing a potential conflict of interest, which may include: (1) financial interests in outside concerns; (2) holding a position as officer or director in an outside concern; (3) other associations with outside concerns; (4) employment; (5) family, friends, and other personal relationships; (6) gifts, entertainment, sponsorships, and honoraria; and (7) use of confidential information and Mubadala Group resources.</p>
 <p>Business Partner Due Diligence</p>	<p>Establishes minimum expectations for business partner due diligence. Due diligence is the process undertaken to assess risks by gathering, analyzing, managing, and monitoring information about a potential business partner. Due diligence includes: (1) checking the legitimacy and background of the business partner before entering in to a business relationship; and (2) monitoring the business partner throughout the course of the relationship.</p>
 <p>Information Management</p>	<p>Provides the framework to manage Mubadala Group information by defining the minimum requirements for each stage of the information lifecycle to enable the Mubadala Group to understand, manage, and protect its information. The information life-cycle is: (1) identification; (2) creation, receipt, categorization, and marking; (3) storage and security; (4) access and sharing; (5) retention; and (6) disposal.</p>
 <p>Securities Trading & Inside Information</p>	<p>Provides guidance to Mubadala Group personnel on how to trade in securities in their personal capacity, which is allowed as long as they do not violate this policy or any applicable law or regulation. In addition, Mubadala Group personnel are required to protect material confidential information related to publicly listed securities and must not engage in insider trading or stock tipping or any other action in violation of applicable laws or regulations.</p>
 <p>Competition Law</p>	<p>Provides guidance on conducting day-to-day activities without engaging in prohibited conduct or entering unlawful agreements that limit or restrain trade. This policy covers competition law principles when: (1) participating in trade associations; (2) doing business with competitors; (3) obtaining competitive information; (4) doing business while in a dominant market position; (5) entering mergers, acquisitions, or joint ventures; and (6) engaging in procurement processes.</p>
 <p>Data Privacy</p>	<p>Sets out the minimum expectations to ensure that the Mubadala Group adopts good practices in relation to collecting and processing personal data. Mubadala is a global company with a presence in many jurisdictions, each of which may have its own laws and regulations for data protection. These rules aim to protect personal data, whether by sharing personal data with other Mubadala Group assets, or with third-parties. The key principles that relate to data privacy are: (1) fair and lawful processing; (2) restriction to a specific purpose; (3) relevance; (4) accuracy; (5) confidentiality (technical and organizational security measures); (6) appropriate data retention; (7) subject's right to access; and (8) controlled data transfer.</p>
 <p>International Trade Controls</p>	<p>Sets out minimum expectations for the Mubadala Group to establish appropriate policies, procedures, and processes aligned to risk, business needs, and specific jurisdictional and regulatory international trade requirements. Most countries control international trade transactions with laws and regulations that govern trade in goods, software, technologies, and services; financial transactions; and brokering. For foreign policy, humanitarian, and national security reasons, these laws and regulations dictate how certain goods, software, technology, and services must be managed when importing, exporting, transferring, re-exporting, or re-transferring them.</p>
 <p>Supplier Code</p>	<p>Establishes the ethics and compliance standards expected of Mubadala Group suppliers. It focuses on: (1) employment practices; (2) fair treatment; (3) child and forced labor; (4) workplace health and safety; (5) anti-bribery and corruption; (6) improper payments; (7) gifts and entertainment; (8) the supply chain; (9) competition; (10) conflicts of interest; (11) books and records; (12) audits and assessments; (13) sustainability; (14) confidential information; (15) competitive information; and (16) accountability.</p>