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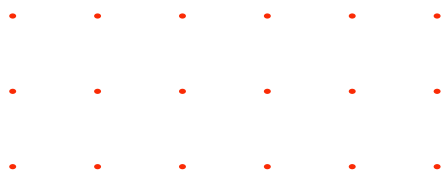


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“

EDGE was inaugurated as an advanced technology group that brings about agile, bold and disruptive solutions for defence and beyond. We have a mission to bring innovative technologies and services to market with greater speed and efficiency, and our work within the strategically important sector of defence means that we strive to enable a secure future. We are an organisation that is looking to revolutionise the industry and challenge the status quo. We place a priority on national security, and count among our customers key stakeholders that protect the security of our nation, and that of global frontiers. Critical to our performance and reputation is our strong commitment to conduct business operations ethically and with integrity. It is not only what we do, but how we do our work. The EDGE Business Partner Code of Conduct describes what we stand for and believe in. It underlines our cultural norms and values, and highlights a common-sense approach to global standards and regulations. The Code is a key pillar for our culture; a culture that promotes transparency and trust, and one that is ‘two-way’. We are committed to achieving our success the right way; the only way. And we all have a responsibility to lead with integrity, as highlighted within our EDGE DNA. I thank you for following our Code, for living by our values and standards, and for enabling us to continue to conduct business ethically, responsibly and legally – in every respect.”

Managing Director & CEO, EDGE



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EDGE upholds the utmost ethical principles in its business operations and anticipates a similar commitment from all Business Partners doing or intending to engage in business with EDGE.

Business Partners, including but not limited to suppliers, contractors (direct or indirect), resellers, distributors, customers, local and foreign agents, advisors, or any party we partner with, are an integral part of our ecosystem, and therefore, EDGE (comprising EDGE Group PJSC and its wholly owned subsidiaries and joint ventures) requires commitment from its Business Partners to abide by responsible business practices.

Consequently, we require our Business Partners to embrace this commitment to integrity when doing business with, for or on behalf of EDGE. This Business Partner Code of Conduct (the “Code”) sets out our Business Partner’s obligations as a condition of doing business with EDGE.

## PURPOSE OF THE CODE

To clarify our expectations for Business Partners and their supply chains, we have developed this Business Partner Code of Conduct. This Code does not supersede third-party contracts with EDGE, and Business Partners must comply with any contract, legal, or regulatory requirements that address the same areas.

## WHAT OUR CODE DESCRIBES

The Code describes the basic rules, standards and behaviours necessary to achieve our objectives and uphold our values. It makes clear that we not only follow the law, but strive to operate with the highest levels of ethics and integrity. The Code also identifies the major elements of our Compliance Programme.



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# ANTI-BRIBERY & CORRUPTION

## PREVENTING IMPROPER PAYMENTS

Improper payments undermine our integrity and trust in business relationships. Our Business Partners are expected to comply with all relevant bribery and corruption laws and not offer, promise, make, accept or agree to accept any improper payments of money or of anything of value to influence or retain business, directly or indirectly, including providing anything of value to a government official or making such payments through an agent. This includes a prohibition on facilitation payments intended to expedite or secure performance of a routine activity that the Government Official is already obligated to perform.

## OFFERING AND RECEIVING GIFTS AND ENTERTAINMENT

We are steadfast in our belief that our Business Partners must compete on the merits of their products and services. The exchange of business courtesies must never be exploited to gain an unfair competitive edge or exercise improper influence. Gifts that are reasonable and proportionate to the relationship, and permitted contractually, in accordance with EDGE's policies and procedures, and any applicable laws, may be accepted as business courtesy, but never with the intent or perceived intent to influence business decisions or behaviour. No cash gifts or cash equivalent should be offered or accepted.

## MAINTAINING AN ANTI-FRAUD CULTURE

Fraudulent activity undermines the integrity and reputation of EDGE. EDGE requires its Business Partners to create and maintain an anti-fraud culture. Business Partners should never attempt to intentionally deceive either EDGE or any other party such as customers or other stakeholders for the purpose of obtaining personal gain and/or unjust, improper or illegal gain or benefits, whether for EDGE, an EDGE Employee or a Third Party. Fraud encompasses behaviour such as deception, bribery, forgery, extortion, corruption, theft, embezzlement, misappropriation, false representation, concealment of material fact, collusion, and fraudulent activity carried out through electronic means.



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# PROTECTING OUR ASSETS

## BEING GOOD STEWARDS OF ASSETS

Safeguarding our property, assets and information from theft, loss, carelessness, and waste is of utmost importance. We expect our Business Partners to responsibly manage and properly care for any EDGE assets that are under their control. Assets should be used exclusively for business purposes, and not be used carelessly, misused or wasted. Business Partners must comply with EDGE's policies and standards for safeguarding assets, information, and people.

## USING OUR INFORMATION TECHNOLOGY RESOURCES

Our information technology resources are critical to our business objectives and it is of the utmost importance to safeguard our information from any cyber threats. We expect our Business Partners to use our IT assets responsibly for business purposes only, in accordance with all contractual terms and in line with all applicable EDGE policies, and to protect our assets and information from unauthorised access or theft. Any security threats or incidents should be promptly reported to EDGE.

## PROTECTING INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

We expect our Business Partners to be aware of and safeguard any intellectual property including trademarks, copyrights, trade secrets, know-how or confidential information, patents and a wide range of other proprietary information such as business plans, research or technical data, employee records and financial data that is in their possession. Business Partners are required to uphold the utmost confidentiality regarding any information shared by any EDGE entity. Unauthorised sharing of Confidential Information or intellectual property is strictly prohibited without prior written authorisation from EDGE.

# PROTECTING OUR INFORMATION

## PROTECTING OUR PRIVACY

We are committed to respecting privacy by keeping personal data protected and secured through responsible and lawful information collection, processing, storage and use practices.

Business Partners are expected to respect the confidentiality of employees' personal data and restrict any access to personal records to authorised personnel only. Business Partners are expected to comply with all applicable UAE and international laws, and seek written consent before sharing any employee personal data. To protect employee personal information, Business Partners should access, share and store confidential employee data solely for legitimate business purposes, ensuring proper controls and approvals, and adhering to a need-to-know basis.

Personally Identifiable Information, which may encompass a broad range of information and may vary from country to country, includes but is not limited to personal identification, phone numbers, and details related to age, gender, or health.

## MARKETING & COMMUNICATIONS

Business Partners must not release any information or communicate externally on behalf of EDGE, without the appropriate approvals and authorisation from EDGE Marketing & Communications Department.



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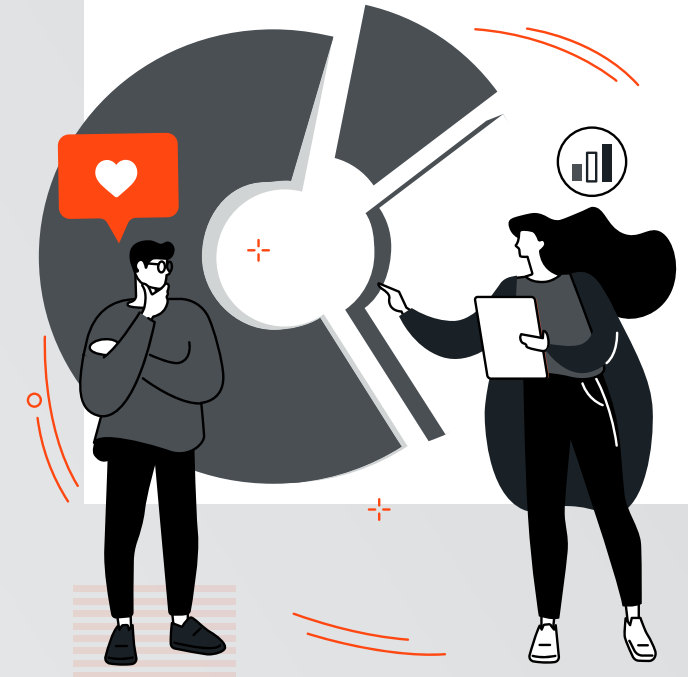


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## AVOIDING MARKET MISCONDUCT

We are committed to conducting business ethically, with unwavering integrity. Market abuse stands contrary to these commitments, and we expect our Business Partners to join us in upholding these ethical standards. In order to preserve the integrity of our partnerships, we expect our Business Partners to respect the confidentiality of any material non-public information acquired during our business relationship, and to avoid any market misconduct. Adherence to these ethical standards is vital for the integrity of our business relationships.

Competitive information may only be obtained from legitimate sources and never do so illegally or unethically. We expect our competitors to guard against receiving or using confidential information that belongs to competitors or other Third Parties, including information from a prior employment.



## AVOIDING CONFLICTS OF INTEREST

Maintaining a strong compliance culture is crucial for our business success, and conflicts of interest can hinder our ability to act responsibly and with integrity. Business Partners must avoid any activity that creates a conflict of interest, or even the appearance of a conflict. These include conflicts that may result from employment; financial interests by you or any family members in companies that do business with EDGE, and affiliations with current or potential competitors, customers or Third Parties of EDGE.

## ANTI-TRUST AND FAIR COMPETITION

Promoting fair competition is essential for our business ethics. Business Partners are expected to comply with applicable laws concerning anti-trust and unfair competition, that limit or retain trade such as price fixing, bid rigging, division of markets or predatory pricing.

Business Partners should not engage in any discussions on any internal or material non-public information or to exchange or share competitive information such as prices, discounts, pricing policy, profits, production levels, customers or sales territories. Competitive information may only be obtained from legitimate sources and never do so illegally or unethically. We expect our competitors to guard against receiving or using confidential information that belongs to competitors or other Third Parties, including information from a prior employment.

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## FAIR DEALING WITH INTEGRITY AND RESPECT

EDGE is committed to dealing fairly with all its Business Partners and fostering a diverse, respectful and inclusive working environment. Discrimination, harassment, abusive or offensive behaviour are unacceptable and contrary to our values.

We adhere to applicable international human rights principles, and aim to align our company’s policies and practices with international standards. We do not use, employ, or seek to exploit in any way the services of children, under-aged, slave or trafficked labour.

We ensure all employment- related decisions, i.e. hiring, promotion, compensation, etc. are carried out fairly, legally, consistently with relevant internal policies and procedures, and are based on merit and the needs of the business. We expect our Business Partners to share and uphold these same values, promoting a work environment that aligns with these principles and refrain from any involvement with unethical labour practices.

## MAINTAINING A HEALTHY AND SAFE WORKPLACE

Health and safety is an important consideration in everything we do, whether providing customer service, evaluating a new acquisition, operating machines or travelling for company business. Substance abuse poses a threat to all of us, and for this reason, it is important that our workplaces are free from substance abuse, including the use or possession of illegal drugs and alcohol.

We are committed to meeting the requirements of applicable UAE and international health and safety laws and regulations established in the jurisdictions we operate in.

We expect our Business Partners to comply with applicable UAE and international health and safety laws, regulations and directives, and provide employees with a safe working environment for employees and any people working on or visiting the premises.

## PROTECTING THE ENVIRONMENT

EDGE is dedicated to environmental protection and sustainability, and committed to upholding industry environmental standards, in strict compliance with applicable UAE and international environmental laws and regulations in the regions where we conduct business. We will live up to our commitment to environmental protection and sustainability by operating our global businesses in a compliant manner, and in a way that minimises environmental impact. We expect our Business Partners to understand and comply with all applicable UAE and international environmental regulations when conducting business, and encourage to minimise environmental impact.

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## PERFORMING DUE DILIGENCE

Due diligence is the cornerstone of our commitment to responsible and informed decision-making. We firmly believe that thorough due diligence is an integral and indispensable aspect of our risk management framework, guiding us to make sound, ethical, and well-informed choices in all our business operations, in compliance with relevant UAE and international industry and sector laws and regulations.

It is equally important to us that our Business Partners share our commitment to robust due diligence processes in their supply chain, as they play an integral role in upholding our standards of integrity and accountability.

## COMPLYING WITH INTERNATIONAL TRADE LAWS

We are committed to fully complying with all applicable UAE and international trade import and export regulations, and expect our Business Partners to conduct their business activities in accordance with all applicable trade regulations. This includes establishing the correct export control product classifications, and obtaining the required licenses, permissions and authorisations.

## PREVENTING MONEY LAUNDERING

We are committed to preventing money laundering, terrorism financing, and the concealment of illicit funds. Business Partners are required to exercise due diligence in monitoring financial transactions and report any suspicious activities. This vigilance ensures that our financial dealings do not facilitate unlawful activities and upholds the integrity and legality of our operations.



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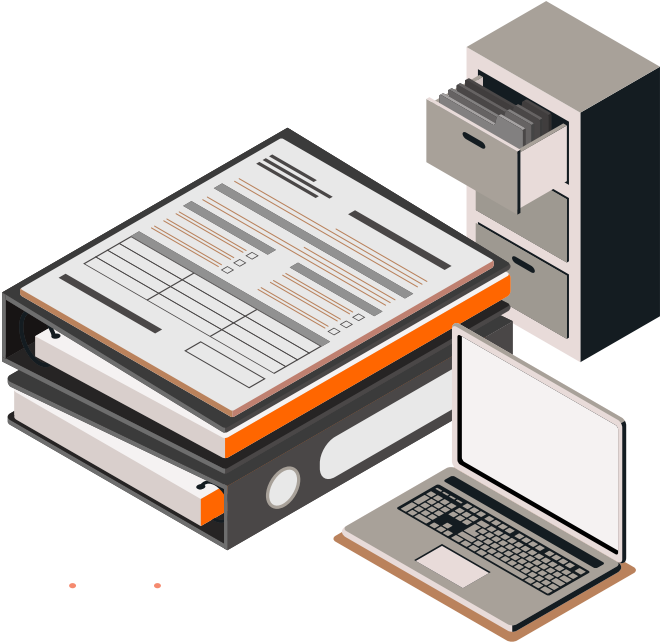
# NON-COMPLIANCE AND REPORTING

## NON-COMPLIANCE OF THE CODE

It is the responsibility of our Business Partners to read, understand, and agree to comply with the Code provided by EDGE. Failure to meet the standards outlined in this Code may adversely affect the Business Partner's relationship with EDGE.

## REPORTING A CONCERN

We encourage our Business Partners to raise any compliance questions or concerns. Business partners are expected to inform EDGE Compliance of any potential breaches to the Code, and to cooperate with EDGE Group in the resolution of any concern. Any identified or potential breaches of this Code should be promptly reported to Compliance via the EDGE Speak Up platform <https://edgegroup.ethix360ae.com>. EDGE will not tolerate any form of retaliation against individuals who report Code-related concerns in good faith. Anyone found to have knowingly or reasonably reported a false concern, may face disciplinary measures and/or legal consequences, including civil or criminal prosecutions.



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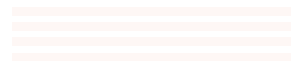


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# TERMS AND DEFINITIONS



TERMS	DEFINITIONS
Concern	Refers to any question or suspicion about any incident of unethical or wrongdoing (involving either employees or external parties) that has occurred or may occur. Concerns are typically raised in good faith with the intention of promoting transparency, accountability, and the well-being of EDGE and its stakeholders.
Confidential Information	EDGE Group's information that requires security measures to ensure minimum protection of its Confidentiality, Integrity, and/or Availability. Aligned with UAE's Ministry of Defense's definition, only "SECRET" data will be considered classified information within EDGE Group.
Government Officials	An official who works for a government department, and includes employees, agencies, and government-owned enterprises.
Information Assets	Refers to information, information content, technology systems and resources used to store, process and maintain information.
Misconduct / wrongdoing	Refers to any behaviour, action, or activity that violates EDGE Code of Conduct, EDGE company policies, UAE and international laws, regulations , or ethical standards.
Report	Refers to the formal communication or disclosure made by a whistleblower, wherein they provide information about the misconduct/wrongdoing, breach of laws or regulations or the EDGE Code of Conduct.
Retaliation	Refers to any adverse action taken by EDGE or its employees, such as intimidation, harassment, demotion, termination, or any other form of reprisal, against an individual who has made a good faith report of wrongdoing, participated in an investigation, or otherwise exercised their rights under the Whistleblower Policy. Retaliation is strictly prohibited and will not be tolerated by EDGE.
Third Party	Refers to any legal entity or individual who conducts or intends to conduct business with EDGE, directly or indirectly, not limited to agents, advisors, business partners, consultants, contractors, suppliers, resellers, distributors, customers, local and foreign agents, service providers, Third Parties and/or vendors.



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