



**SUPPLIER CODE OF CONDUCT
2025**

ABOUT DAMAC DIGITAL

WHAT WE DO

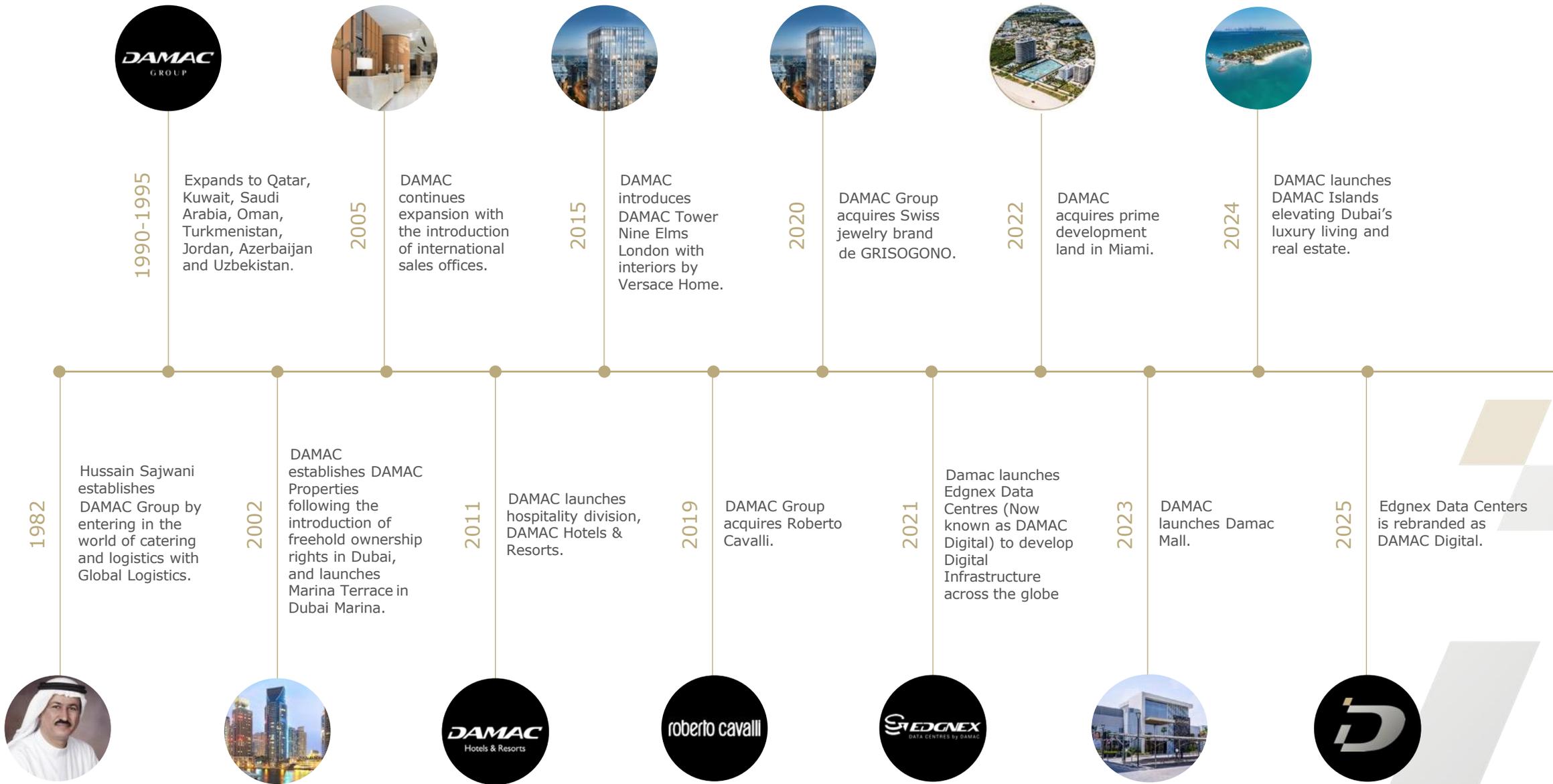
DAMAC Digital provides agile, world class AI ready data centers, purpose-built for hyperscalers and growth focused organizations. We enable our partners to enter high-growth and emerging markets with infrastructure designed to scale seamlessly alongside their ambitions.

HOW WE DO

With an obsession for delivering impact for our customers, we handle every step of market entry—from strategic site selection to turnkey data center delivery. Our infrastructure excellence, robust financial foundation, and agile project management ensure reliable performance and rapid deployment in high-demand regions.

A photograph of a data center aisle with rows of server racks. The racks are illuminated with warm, golden light, and the perspective is looking down the aisle, creating a sense of depth. The text is overlaid on the bottom left of this image.

DAMAC Digital is building
the backbone of the
AI-driven digital economy.



OUR DIFFERENTIATOR: WHAT SETS US APART



Local Presence, Global Reach

Leveraging our extensive network to provide personalized, local support with the capability to execute projects globally.



DAMAC Group's Legacy of Infrastructure Excellence

Building on DAMAC Group's decades of real estate and infrastructure expertise to deliver top-tier data center solutions.



Financial Stability and Robust Backing

Powered by DAMAC Group, DAMAC Digital has strong financial stability, ensuring the capacity to undertake and deliver large-scale projects.



Global and Fast Delivery Expertise

Proven track record in executing large-scale, complex projects around the world, ensuring reliability and excellence in delivery.



Innovative and Ultra High Power Density Solutions with AI readiness

Our data centers are designed to support high-performance AI workloads, ensuring optimal infrastructure for advanced computing needs.



International Talent and Industry Expertise

Our team comprises global talent and industry experts, bringing unparalleled knowledge and value to our data centers.



Carrier-Neutral Connectivity

Offering diverse connectivity options to ensure flexibility and choice for our clients, enabling seamless integration with multiple carriers.



Comprehensive Security and Fire Protection

Employing state-of-the-art surveillance and fire protection systems to safeguard our clients' critical assets.



Sustainable and Energy-Efficient Solutions

Implementing green building practices and energy-efficient technologies to reduce environmental impact and operational costs.

MESSAGE FROM OUR LEADERSHIP

Dear DAMAC Group Professionals,

Our Code of Conduct and Ethics is embedded in DAMAC's culture. It reflects our core values and guides us to act with integrity in a diverse, unified, and collaborative workplace. As industry leaders, we uphold and champion the highest ethical standards, well beyond legal requirements.

In a world of rapid change, driven by advances in AI, shifting geopolitical landscapes, and growing climate-related regulations, DAMAC remains firmly committed to fulfilling its social responsibilities and delivering lasting value to our clients.

The Code is your daily guide to making responsible decisions that align with DAMAC's values. It serves as a roadmap, outlining key rules and providing links to policies and resources to help you understand what is and is not acceptable in the decision-making process. Please take the time to read it carefully, refer to it regularly, and use it as a reference when navigating complex situations. If in doubt, reach out to your manager, Compliance Director, or your HR partner.

Our reputation and success depend on each of us living by DAMAC's values and conducting ourselves with integrity in all business dealings. Regardless of role or location, we all share the responsibility of upholding the standards set out in our Code.

Thank you for your continued dedication to upholding our ethical values and helping us operate responsibly and with integrity.

You can contact any leader within the business or any HR representative, or you can ask me personally at Codetofollow@damacgroup.com.

Hussain Sajwani

Founder & Chairman



EXECUTIVE SUMMARY

DAMAC Digital Holding Company Limited ("DAMAC Digital") is committed to the highest standards of integrity and social responsibility, and DAMAC Digital expects all Suppliers engaged in providing products and services to DAMAC Digital ("Suppliers") to have, or to make, a similar commitment. DAMAC Digital Supplier Code of Conduct ("Code") describes DAMAC Digital's expectations for how its Suppliers conduct business. DAMAC Digital requires Suppliers to act in accordance with the Code and with all applicable laws and regulations within the geographies in which they operate, and to be open and cooperative with regulators that enforce such laws. Suppliers must impose substantially similar obligations to those set forth herein on their own suppliers, subcontractors, and agents or share this Code with all individuals assigned to perform work for or on behalf of DAMAC Digital. Suppliers shall ensure that all DAMAC Digital-related tasks are executed by individuals with the skills, expertise and certifications necessary to uphold the principles and meet the standards of the Code.

DAMAC Digital may require Suppliers to demonstrate that they are in compliance with this Code of Conduct. Failure to comply with the expectations outlined in the Code of Conduct could result in termination of the assignment and/or contract.

This Code is not a Contract. The Code becomes enforceable when referenced in an agreement. It does not confer rights on any supplier, nor does it impose obligations on DAMAC Digital. In case of a conflict between this Code and DAMAC Digital contract, the terms of the contract shall prevail.



PURPOSE

This Code sets forth the principles and standards of conduct that DAMAC Digital expects Suppliers, their employees and subcontractors and/or suppliers to meet during the provision of goods and services to DAMAC Digital.

To support compliance with this Code, Suppliers shall ensure that the Code is shared with all individuals assigned to perform work for or on behalf of DAMAC Digital, and that all DAMAC Digital-related tasks are executed by individuals with the skills, expertise and certifications necessary to complete the job in a safe and compliant manner. This is to meet the Standard of the Code and all applicable laws and regulations and DAMAC Digital policies, and in accordance with the highest standards of ethical business conduct.

SCOPE

The Code covers all stages of engagement between DAMAC Digital and Suppliers. Suppliers shall ensure that all business with and/or on behalf of DAMAC Digital is conducted in compliance with all applicable laws, regulations and policies.





APPLICABILITY

The Code shall apply to all Suppliers and their representatives (including employees, Suppliers, agents and subcontractors collectively referred to as “the Supplier”) engaged in conducting business with and/or on behalf of DAMAC Digital.



ETHICAL BUSINESS CONDUCT

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Conflicts of Interest

DAMAC Digital requires Suppliers to exercise reasonable care and diligence to prevent any actions or conditions that could result in a conflict with DAMAC Digital's interests, or the appearance of a conflict of interest that may compromise the exercise of independent judgment during the execution of work for or on behalf of DAMAC Digital specifically:



ETHICAL BUSINESS CONDUCT

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Conflicting Business Interests

While engaged in DAMAC Digital-related work, Supplier shall not engage in any activity that creates a conflict of interest, or the appearance of a conflict of interest, with DAMAC Digital or in any way compromises the work that Supplier is contracted to perform on behalf of DAMAC Digital. A conflict of interest can arise if actions are taken or if there are interests that may make it difficult for Supplier to perform DAMAC Digital-related work objectively and effectively. Any actual or potential conflicts shall be disclosed to DAMAC Digital and written confirmation obtained that states Supplier is allowed to remain in a situation that could be perceived as a conflict. Actual and/or Potential conflict of interest situations shall be reported to Head of Compliance.



ETHICAL BUSINESS CONDUCT

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Close Personal Relationships

Close personal relationships between the Supplier workforce members and DAMAC Digital employees responsible for monitoring Supplier's performance should be avoided in order not to compromise the exercise of independent judgment, or lead to claims of a conflict of interest.

To avoid these problems and to foster a positive work environment, Supplier shall report to DAMAC Digital any close personal relationships that result, or could result, in a conflict with this Code.





ETHICAL BUSINESS CONDUCT

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Anti-Bribery and Corruption

- A. Supplier shall prohibit all forms of bribery, facilitation payment, corruption, extortion and embezzlement and shall report to DAMAC Digital any violation to the Bribery Act of UK, Foreign Corrupt Practices Act of USA or any other applicable law in the country of DAMAC Digital's operations.
- B. Suppliers shall never indulge in acts of bribery when dealing with public officials and DAMAC Digital Employees especially when acting on behalf of DAMAC Digital.

ETHICAL BUSINESS CONDUCT

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Anti-Trust and Competition

DAMAC Digital believes in fair competition and expects Suppliers to comply with all applicable anti-trust or fair competition laws and regulations. The Suppliers shall not engage in any unfair practices that unreasonably undermine free competition in a tender through prior consultation, collusion, or agreement with other tenderers, such as bid rigging or collusion to fix prices to render the award of the tender to a particular participant.

In the event of violation of the above or that the Supplier is found to have committed any unfair practices, or offered bribes to any officials concerned in connection with registration, pre-qualification, invitation to tender, award of Contract, execution, or performance of the Contract, DAMAC Digital reserves the right to take action as deemed appropriate by Senior Management and in accordance with applicable laws and internal procedures which may include (i) cancel the successful bid in case the Contract has not been executed and/or (i) terminate the Contract in whole or part, along with the retention of any performance bond.

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Gift & Entertainment, Donation and Hospitality

DAMAC Digital discourages Suppliers from offering or accepting gifts, services, discounts, gratuities, payments of fees, bribes, entertainment or other benefits or items of value (collectively “gifts”) or other favors that influence, or appear to influence, the performance of their duties or assist the Supplier in obtaining undue or unfair advantage.

Similarly, DAMAC Digital forbids its Employees, as well as members of their immediate families, from accepting gifts from Suppliers doing business with or seeking to do business with DAMAC Digital.

DAMAC Digital Employees have an obligation to abide by the DAMAC Digital Code of Conduct. Expensive business entertainment shall never be offered to DAMAC Digital Employee or their representative by a Supplier under circumstances that create the appearance of an impropriety.

General conditions for offer of gifts and entertainment - The gifts and entertainment offered shall be customarily associated with the maintenance of ongoing legitimate business relationships, and provided that they are infrequent and proportionate to the relationship.

They shall be:

- a) Unsolicited.
- b) Legal in the countries of both the giver and the recipient.
- c) Made openly and transparently.
- d) Reasonable and appropriate for the occasion.
- e) Properly recorded in the Supplier’s books and records.
- f) Not cash or usable as cash (for example, shopping voucher or a gift certificate is not acceptable).
- g) Of nominal value (that is, less than USD 50 in face value).
- h) Discounts from Suppliers that are available to all Employees.
- i) Promotional items, mementos, souvenirs, advertising novelties bearing the logo of the Supplier and other items including food and beverage of a modest value (typically less than USD 50).

ETHICAL BUSINESS CONDUCT

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Customs, Trade Controls & Sanctions

DAMAC Digital adopts a zero-tolerance approach to any non-compliance in relation to Customs, Trade Controls & Sanctions. DAMAC Digital, follows the below sanctions regime:

- United Kingdom
- United States of America
- United Nations
- European Union
- United Arab Emirates

Suppliers are expected to comply with all applicable laws and regulations pertaining to sanctions and embargoes notwithstanding the jurisdictions and geographies where they operate in. The Suppliers shall develop their own ongoing screening, review and monitoring mechanisms to ensure compliance.

ETHICAL BUSINESS CONDUCT

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Anti- Money Laundering

DAMAC Digital adopts a zero-tolerance approach to any form of money laundering or terrorism financing. Suppliers are expected to comply with all relevant laws and be particularly attentive to cross border transfers of monies which could be construed as attempts to launder money. Suppliers must monitor their operations and ensure that money laundering schemes are effectively eliminated from their operations. The Suppliers shall develop their own anti-money laundering policies and procedures as well as ongoing review and monitoring mechanisms.



ETHICAL BUSINESS CONDUCT

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Fraud, Deception and Dishonesty

DAMAC Digital is committed to highest business ethics through creating and sustaining a corporate environment in which the affairs of DAMAC Digital are conducted in a fair and transparent manner, by adopting the highest standards of professionalism, honesty and integrity, free from any acts of fraud or misconduct.

DAMAC Digital provides a mechanism for reporting potential activities and/ or behaviors which may be construed as misconduct and/or fraudulent for example unfair practices in DAMAC Digital's procurement process. Suppliers are encouraged to report instances of bribery/corruption, reporting of fraudulent financial information to stakeholders, fraud, employee misconduct, illegality or health and safety and environmental issues which may result in financial loss, damaging to the safety culture and reputation of DAMAC Digital and / or its employees.

Information regarding DAMAC Digital's whistleblowing procedures and reporting system are available on website <https://damacdigital.com>

DAMAC Digital expects Suppliers to conduct business in accordance with the highest ethical standards including adhering to DAMAC Digital Code of Conduct, which includes the following:

Equality, Inclusion and Diversity

DAMAC Digital supports an inclusive culture and believes in promoting diversity, discrimination of any form should not be tolerated.

Suppliers must comply with all applicable laws and regulations relating to discrimination in hiring, employment practices, and harassment and retaliation.

Suppliers must operate in workplaces free of unequal treatment in employment, discrimination, harassment, victimization, and any other abuse on any grounds including but not limited to age, health status, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religion or beliefs, union affiliation, or veteran status. Unequal treatment includes the payment of unequal remuneration for work of equal value.

DAMAC Digital reserves the right to audit, suspend, or terminate any Supplier relationship for material breach of the provisions under this Section 7, or for failure to cooperate in investigations related to ethical conduct.

Suppliers are required to protect personal information in compliance with all applicable laws and regulations. Personal information provided by or on behalf of DAMAC Digital must only be used, accessed, and disclosed as permitted by the Supplier agreement and in compliance with all applicable laws and regulations.

Suppliers who have access to DAMAC Digital's information systems are responsible for ensuring the security of those systems by identifying and complying with applicable DAMAC Digital information and cyber security policies and standards available from DAMAC Digital.

Applicable requirements include ensuring the following:

- Computer accounts, passwords and other types of authorization are assigned to authorized users and must not be shared with or divulged to others. Authorized users will be held accountable for all actions taken on their system with their user identification.
- Internet access is not used to conduct personal business, play computer games, conduct political campaigns or for personal gain.
- Inappropriate or pirated content is not stored on DAMAC Digital equipment nor transmitted through DAMAC Digital networks.
- Only approved, authorized and properly licensed software is used on DAMAC Digital computer systems.
- No attempts are made to circumvent or attack security controls on a computer system or network.
- DAMAC Digital-issued equipment is always protected from unauthorized access and theft, including locking the computer screen when the computer or laptop is left unattended.
- Violations of any of the above may result in termination of Supplier's contract with DAMAC Digital.

In this regard, the Supplier shall:

- Only use DAMAC Digital information and property (including tools, drawings and any other specifications classified as DAMAC Digital's property) for the purpose for which they are provided to the Supplier and for no other purposes.
- Take appropriate steps to safeguard and maintain the confidentiality of DAMAC Digital's proprietary information, including maintaining it in confidence and in secure work areas and not disclosing it to third parties (including other customers, subcontractors, etc.) without the prior written permission of DAMAC Digital.
- Observe and respect all DAMAC Digital patents, trademarks and copyrights and comply with such restrictions or prohibitions on their use as DAMAC Digital may from time to time establish.
- If requested to send data over the Internet, follow DAMAC Digital Information Security protocols.
- Comply with all applicable rules concerning cross-border data transfers.
- Maintain all personal and sensitive data, whether of DAMAC Digital Employees or its customers in secure and confidential manner, taking into account both local requirements and the relevant DAMAC Digital policies provided to the Supplier.
- Supplier shall report to DAMAC Digital any suspected data breach immediately following detection.
- Comply with data protection requirements of United Kingdom and General Data Protection Regulation (GDPR) of the European Union if applicable.
- Not use DAMAC Digital logo or proprietary graphics in a way that suggests representation of DAMAC Digital.

In this regard, the Supplier shall:

Supplier shall neither disclose the contractual relationship with DAMAC Digital nor the scope of the contract to third parties unless written consent is provided by DAMAC Digital Corporate Communications Department.

- News Media: No Supplier shall engage with the media to disclose any information related to the commercial relationship with DAMAC Digital and/or represent DAMAC Digital unless written consent is provided by DAMAC Digital Corporate Communications Department.
- Social Media: Supplier shall have processes in place to ensure that the use of social media by their workforce or representatives does not negatively affect DAMAC Digital's reputation. Processes should specifically ensure against the following:
 - a. DAMAC Digital prohibits any online behaviour that may cause reputational or legal risk.
 - b. Representation of any content in any social media regarding DAMAC Digital without prior written approval from DAMAC Digital Corporate Communications Department.
 - c. Posting content about DAMAC Digital Employees, stakeholders, Suppliers or affiliates that is derogatory or in contravention of any standards in this Code.
 - d. Posting photographs or video of non-public areas of DAMAC Digital premises, processes or operation without prior approval from DAMAC Digital Corporate Communications Department.
 - e. Use of DAMAC Digital's logo or proprietary graphics in a way that suggests representation of the company.

BUSINESS CONTINUITY MANAGEMENT

- Suppliers shall have a documented Business Continuity Plan which enables them to resume operations as soon as possible and strive to minimize the impact on the supply chain in the event of a situation that has a major impact on business continuity.
- Such situations include but are not limited to large-scale natural disasters (earthquakes, tsunamis, floods, heavy rain, heavy snow, tornadoes) and resulting power outages, water supply failure, traffic obstacles, accidents (fires, explosions), as well as epidemics of infectious or contagious diseases, terrorist attacks and riots, cyberattacks, or drastic changes in the balance of supply of and demand for raw materials or parts.
- Suppliers shall ascertain the impact on delivery dates and/or service levels in the event of a disaster and strive to establish immediate contact with DAMAC Digital.
- As a precautionary countermeasure, it is critical to have a local restoration strategy, concerning how to protect, mitigate and restore individual elements of a production base against possible damage. It is also crucial to secure alternative means of production, assuming that recovery from damage caused by a disaster may take long. It is effective to prepare a manual for rapid recovery of business according to contents described in a business continuity plan and continuously educate and train employees so that they can respond to actual disasters when business has stopped.

EMPLOYMENT, WORKING CONDITIONS AND HUMAN RIGHTS

Employment, working conditions and human rights

DAMAC Digital expects its Suppliers to know and uphold the human rights explicitly prohibiting from child labour, forced labour, human trafficking, or modern slavery of all workers, whether temporary or contract employees and to treat all their workforce members with dignity and respect, providing them with safe and humane working conditions meeting at least the minimum requirements of applicable law.

HEALTH AND SAFETY

DAMAC Digital maintains a fully accredited HSE Management System and Suppliers are required to comply with all applicable requirements. The safety of the public, Employees and Suppliers is DAMAC Digital's highest priority. Working safely and in compliance with all applicable safety rules, laws, standards, regulations, procedures, and rules of this Code of Conduct is a condition of engagement as a Supplier to DAMAC Digital. Suppliers to be provided safety training and incident reporting procedures.

ENVIRONMENTAL SUSTAINABILITY

DAMAC Digital is committed to being an environmental and sustainability leader and demonstrating this through its actions, including conducting its business in full compliance with the spirit of all applicable environmental and sustainability laws, regulations, requirements and operating in an environmentally sensitive manner consistent with its values. DAMAC Digital requires that Suppliers operate in a similar environmentally responsible manner, with appropriate environmental and sustainability management and measures.

POLICY OWNERSHIP AND CHANGE CONTROL

This document will be formally reviewed every 1 year by the document owner. Ad hoc reviews of this policy may be made, where company circumstances require it.



LET'S GET STARTED

Email: Codetofollow@damacgroup.com

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Headquarters: 36th Floor, Shatha Tower, Dubai Internet City
Dubai, UAE