

Supplier Code of Conduct

Overview

Sabey Data Centers (SDC) provides top-tier data center services, including reliable power, cooling for IT infrastructure as well as environmental controls and physical security services. We are dedicated to delivering secure and efficient solutions that fulfill the needs of our customers and stakeholders and strive to maintain the highest standards of integrity, respect, and responsibility across all our operations and supply chain.

Supplier Code of Conduct

This Supplier Code of Conduct defines what SDC expects from all suppliers and their personnel who provide goods or services. Suppliers shall understand and comply with this Code, as it applies to the services provided to SDC. Suppliers shall ensure their actions uphold our standards and avoid any misconduct or unethical behavior.

Legal and Regulatory Compliance

It is our policy to integrate sustainable practices into our day-to-day operations, including the responsible sourcing of materials, energy efficiency, and the adoption of carbon free energy sources whenever feasible.

Suppliers shall also fulfill any specific contractual obligations with SDC or its customers and partners.

In cases where a law or regulation conflicts with this Code, suppliers should follow the law. However, if local customs conflict with this Code, suppliers are required to adhere to the Code.

Business Practices and Ethics

Suppliers shall conduct their operations with honesty, integrity, and professionalism and avoid conflicts of interest that could impact their obligations to SDC or its customers and partners. They shall adhere to the following guidelines:

- **Gifts and Entertainment:** Suppliers should exercise discretion in offering or accepting gifts, meals, or entertainment. Such items shall not be illegal, unethical, or lavish and should not appear to influence business decisions. Suppliers shall adhere to any specific guidelines set by SDC or its customers regarding gifts and entertainment and obtain prior approval when necessary.
- **Anti-Corruption:** Suppliers shall adhere to all relevant anti-corruption and anti-bribery laws. They shall not offer, promise, authorize, or give anything of value to influence business decisions or gain an unfair advantage. This includes dealings with government officials, political parties, candidates, public organizations, or any other entities or individuals. Suppliers shall also prevent and strictly prohibit kickbacks, extortion, embezzlement, and money laundering in their operations. They are required to establish effective controls and procedures to monitor, detect, and report any corrupt activities.

- **Insider Trading:** Suppliers shall adhere to all relevant insider trading and securities laws. They are prohibited from buying or selling securities of SDC, its customers, partners, or any other company when possessing material non-public information that could influence the security's value. Additionally, suppliers shall not share or disclose such information for trading purposes.
- **Conflicts of Interest:** Suppliers shall avoid any situation or relationship that could lead to a conflict of interest with their duties to SDC, its customers, or partners. They shall immediately disclose any actual or potential conflicts to SDC and seek guidance on how to address them. Examples of conflicts include having a financial or personal relationship with SDC's competitors, customers, or suppliers; or engaging in external activities that could affect their service to SDC.
- **Press and Publicity:** Suppliers shall not issue press releases or engage in publicity that involves SDC or its stakeholders without prior written consent.

Human Rights and Labor Practices

Suppliers shall respect and protect the human rights and dignity of everyone impacted by their business, including workers, customers, partners, suppliers, and communities. They shall comply with all relevant labor and employment laws, ensuring fair and equal treatment for all workers. Additionally, suppliers are required to meet the following standards:

- **Non-discrimination and non-harassment:** Suppliers shall not discriminate or harass any worker or applicant based on protected characteristics including race, gender, religion, age, and more. They shall ensure a workplace free from harassment, intimidation, bullying, violence, abuse, or coercion in any form.
- **Child Labor:** Suppliers shall not use child labor in any form. Suppliers shall verify and record the age of all workers and only support lawful apprenticeship or internship programs that

benefit youth and comply with relevant laws. Additionally, no workers under the age of 18 should be exposed to hazardous or harmful conditions that could affect their health, safety, or well-being.

- **Forced Labor:** Suppliers shall not use or support any form of forced labor, human trafficking, or modern slavery. All work shall be voluntary, and workers should be free to terminate their employment at any time without penalty, given reasonable notice. Suppliers shall not charge workers any fees for recruitment, employment, or termination, nor require them to surrender identity or travel documents. Additionally, suppliers should not restrict workers' freedom of movement or communication and shall refrain from using threats, violence, coercion, deception, or intimidation.
- **Health and safety:** Suppliers shall provide a safe and healthy work environment, effectively managing and mitigating any workplace hazards to prevent risks or injuries. They shall comply with all occupational health and safety laws and regulations, and implement necessary policies, procedures, systems, and training to protect worker health and safety.

Environmental Protection and Sustainability

Suppliers shall respect and protect the environment by minimizing the environmental impact of their business activities, products, and services. They shall comply with all relevant environmental laws and regulations and implement effective policies and practices to ensure environmental sustainability. Additionally, suppliers are required to meet the following standards:

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- **Pollution Prevention:** Suppliers shall prevent or minimize pollution, waste, and greenhouse gas emissions by adhering to the principles of reduce, reuse, recycle, and recover.
 - **Sustainable Sourcing:** Suppliers shall source materials and services that are environmentally and socially responsible, focusing on materials and services sourced from carbon free electricity, recyclable and/or biodegradable options, and those with a lower carbon footprint.
 - **Waste Management:** Suppliers shall manage waste by properly identifying, classifying, storing, handling, transporting, and disposing of it in line with legal and environmental best practices.
 - **Water Management:** Suppliers shall aim to reduce water consumption and wastewater generation, and reuse or recycle water when possible.

Reporting and Accountability

Reporting Compliance and Violations:

Instances of noncompliance may be reported through the dedicated email address: SDCCompliance@sabey.com.

Review and Enforcement:

SDC retains the right to review suppliers to ensure adherence to the code, focusing only on aspects relevant to the services provided to SDC. These audits may involve reviews of practices and records.