



Code of Conduct

G42's Compliance Program

Our Code of Conduct (Code) is at the heart of the Compliance Program (Program). It sets out G42's policy on lawful and ethical business conduct, which demonstrates internally and externally our commitment to act with integrity. Our Program reinforces the company's commitment to developing awareness and understanding of G42's ethical values ensuring that G42 employees understand their key responsibilities. The Program is a commitment from the top down to: (i) Improve G42's business opportunities and sustainability (ii) Protect and enhance G42's reputation (iii) Increase third party confidence in G42's ability to deliver with integrity (iv) Minimize the risk of non-compliance with local and international laws and (v) Demonstrate G42's commitment to managing its compliance risks effectively and efficiently.

G42's Code of Conduct

The Code sets out G42's: (i) Principles, (ii) Standards of professional conduct, (iii) Ethical behavior and (iv) Commitment to ensure compliance with local and international trade control laws.

Scope

The Code applies to all employees. G42 has a separate Code of Conduct for Third Parties.

Accountability

G42 expects high standards of integrity along with professional and personal behaviors from its employees which align with G42's reputation and protects its interests. If your conduct violates this Code, you may be subject to disciplinary action.

Code of Conduct Your Responsibilities

Our Code sets out seven key responsibilities. These are to -

1 Prevent Bribery and Corruption

G42 adopts a zero-tolerance approach to any form of bribery or corruption. G42's Anti-Bribery and Corruption Policy provides guidelines on our approach to conducting business in a lawful and ethical manner. G42 employees are expected to comply with applicable anti-bribery and corruption laws.

2 Manage and Protect Confidential Information

All G42 information is considered confidential. G42's Policies provide guidelines on managing and protecting Confidential Information. Employees must not disclose, disseminate, or use G42 confidential information other than as part of their official duties. Confidential information must not be used for personal gain for self or for others. We must take care when handling confidential information; the conversations we engage in and the statements we post on social media. Leaking G42 information is potentially damaging to G42's reputation. Information gained during the course of your employment about G42, our customers, suppliers business partners and or other employees must be held in strict confidence, both during your term of employment and after.

3 Avoid Conflicts of Interest

Employees should avoid situations or positions of conflicts of interest which could interfere with their judgement with respect to carrying out their responsibilities on behalf of G42. G42's Conflict of Interest Policy provides guidelines on managing conflicts of interest. Some examples of where conflicts of interest can arise are: (i) where employees have a financial interest which could affect their judgement (ii) where employees can gain personal enrichment through access to confidential information (iii) where employees can misuse their position at G42 for personal gain (iv) where employees have a personal interest, direct or indirect in any of G42's business partners. Employees are required to declare conflicts of interest in writing.

4 Protect G42 Data

Our Company Policies provide guidelines on the protection and handling of Company data. Employees must ensure that any proprietary or confidential information cannot be accessed by unauthorized people and that sensitive information is only discussed with people who are authorized to have access to it.

5 Declare Gifts and Entertainment

Employees must report any offers, receipt of gifts and or hospitality in excess of 400 AED. All sponsored travel must be approved in advance. G42's Gift, Entertainment, Sponsored Travel and Hospitality Policy provides guidelines. Gifts and entertainment between colleagues do not need to be declared.

6 Protect Insider Information

Insider information is confidential and disclosure is strictly prohibited. Employees must not use information gained during their employment with G42 unless such information is already available to the public for personal gain or gain for others. G42's Insider Information Policy provides guidelines and sets out G42's standards on trading and/or the enabling of trading when in possession of Insider Information.

Comply with International Trade Sanctions and Control Laws

G42 operates globally. We require to comply with international trade sanctions and control laws. G42's Sanctions and Export Control Policy provides guidelines to ensure G42 does not engage in transactions or conduct business in violation of applicable sanctions or export control laws.

G42 Reporting Channels

Employees are encouraged to raise concerns, in confidence, regarding misconduct or unethical behavior, breaches of law, regulations, fraud or other similar acts by using the following reporting channels:

1. [G42Voice](#)
2. G42 Voice helpline
800 0321263
3. ethicsandcompliance@g42.ai
4. [Marvin](#)
5. Your line manager

Contact information

If you have any questions regarding this Code Email the G42 Ethics and Compliance team.