



# **ADGM Supplier Code of Conduct**

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**August 2025**



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## 1. Introduction

- 1.1 The ADGM is an international financial centre that consists of the Financial Services Regulatory Authority, Registration Authority and ADGM Courts (each independently an “**Authority**” and together the “**Authorities**”), as well as the ADGM Authority, Board Executive Offices and relevant subsidiaries of the ADGM (in accordance with an intragroup agreement) of the ADGM (collectively with the Authorities referred to as the “**ADGM**”).
- 1.2 ADGM is committed to conducting business in compliance with all applicable laws and regulations and in accordance with the highest standards of ethics and integrity. All individuals and entities that engage, or seek to engage, in any form of business with ADGM (“**Suppliers**”) are expected to uphold such standards in good faith.

## 2. Purpose and Scope

- 2.1 The purpose of this Supplier Code of Conduct (“**Supplier Code**”) is to outline the minimum standard of ethical business practice that ADGM expects of all its Suppliers.
- 2.2 The Supplier Code does not reduce or replace any Supplier’s legal obligations and does not override the terms of any agreement that a Supplier may have entered into with ADGM.
- 2.3 Suppliers are responsible for ensuring that any third parties (such as sub-contractors) they have engaged with for the purpose of fulfilling part or all of their contractual obligations to ADGM comply with the minimum ethical standards of business practice set out in this Supplier Code.

## 3. Business Ethics and Compliance

- 3.1 ADGM requires its Suppliers to conduct their business in compliance with all applicable laws and regulations, and to act with respect, fairness, honesty, and integrity when they are working for or representing ADGM. Suppliers are expected to adhere to the following:
- 3.2 ***Respect and Fair Treatment***
  - a) ADGM believes that everyone has the right and responsibility to maintain a respectful, fair, and empowering work environment that is free from any forms of harassment, discrimination or offensive behaviour. Suppliers are expected to ensure the same standards apply in their interactions with ADGM and others acting on their behalf for ADGM.
  - b) ADGM respects and abides by both internationally recognised principles and national standards of human rights. Suppliers are expected to respect and abide by the same principles. In particular, Supplier must not use or be complicit in any form of child labour, forced labour, modern slavery, or human trafficking.
- 3.3 ***Honesty and Integrity***
  - a) Suppliers are expected to perform their duties with professionalism, integrity, and accountability and conduct themselves in a manner that fosters trust and transparency.
  - b) .

### 3.4 ***Anti-Bribery and Corruption***

- a) Suppliers must apply a zero-tolerance approach to all forms of corruption, including but not limited to bribery and fraud.
- b) Suppliers must not offer, promise, give, accept, or solicit anything of value as an inducement for an action which is illegal, improper, or unethical. A bribe may take many forms, including gifts, payments, fees, favours, or other advantages which can involve anything of value to the recipient.
- c) Supplier must not make facilitation payments, which are defined as payments intended to expedite routine and legally required actions by a person in charge of a – usually government-related – service or action. Under this Supplier Code, such payments are regarded as bribes and are strictly prohibited.
- d) Suppliers are required to comply with all applicable anti-corruption laws, such as the UAE Penal Code, the UK Bribery Act of 2010, and the U.S. Foreign Corrupt Practices Act.

### 3.5 ***Gifts, Hospitality and Entertainment***

- a) Suppliers' business relationships are expected to remain objective, fair, transparent, and free from any actual or perceived impropriety.
- b) Suppliers must not offer to or accept from a third party gifts, hospitality, or entertainment if there is an actual or reasonably perceived intention to influence someone's decision-making in an illegal, improper, or unethical manner.
- c) Suppliers are expected to exercise caution around the timing of offering or accepting gifts, hospitality, or entertainment such as during tender or bid processes, to avoid any actual or reasonably perceived impropriety.

### 3.6 ***Conflicts of Interest***

- a) Suppliers in their interactions with ADGM are expected to avoid, or where not possible, appropriately manage any actual, potential, or reasonably perceived conflicts of interests.
- b) Suppliers are expected to, as soon as they become aware of it, inform ADGM Procurement & Contracts about any financial or professional interests (e.g. shareholdings, directorships, advisory positions), personal, or other interests that could unduly influence the business judgement of either ADGM personnel or Supplier representatives.

### 3.7 ***Healthy and Safe Environment***

- a) ADGM strives to provide everyone working for and with ADGM with a safe and healthy work environment. All Suppliers, while on ADGM's premises, are responsible for maintaining a safe and healthy workplace by complying with all relevant health and safety standards, laws, regulations, and site-specific requirements.

### 3.8 ***Supply Chain***

- a) Suppliers are expected to carefully select and monitor the third parties (such as sub-contractors) they may engage to supply goods or services to ADGM.

### **3.9 Fair Competition**

- a) Suppliers are expected to conduct business in a manner that promotes fair competition and avoid practices that improperly restrict competition.
- b) Supplier are expected to not engage in deceptive or misleading practices and is expected to compete honestly and ethically to uphold a fair and open marketplace.

### **3.10 Protection of Assets and Information**

- a) Suppliers are expected to protect ADGM's assets and ensure their efficient, secure, and proper use in accordance with any contractual and legal requirements.
- b) If ADGM's confidential information (including personal data) or intellectual property is shared with Suppliers, they must protect, store, and use such information responsibly and lawfully, and only for authorised purposes.

### **3.11 Transparency**

- a) Suppliers are expected to promptly notify ADGM of any material event that may affect the delivery of their goods and services. This includes, but is not limited to, cyberattacks, data breaches, or other disruptions that could impact ADGM's operations.

## **4. Sustainability**

- 4.1 ADGM is committed to conducting its business activities in an environmentally responsible, socially equitable, and economically sustainable manner. Suppliers are expected to align with these values by adopting responsible business practices that minimise environmental impact and support sustainable development.
- 4.2 Suppliers must adhere to the applicable environmental laws and regulations, practice ethical labour standards and continuously improve their sustainability efforts.
- 4.3 ADGM incorporates sustainable procurement principles into its selection and evaluation of Suppliers and promotes continuous improvement in sustainability practices, including the adoption of industry standards and certifications. Suppliers are expected to align with these principles and actively pursue similar improvements.

## **5. Reporting**

- 5.1 Suppliers are expected to report concerns and observed or suspected violations of this Supplier Code, or any illegal or unethical behaviour to ADGM Procurement & Contracts.
- 5.2 If a Supplier is uncomfortable reporting to ADGM Procurement & Contracts or wishes to remain anonymous, they can use any of the following channels:
  - a) send an email to: [AMANAHA.portal@adgm.com](mailto:AMANAHA.portal@adgm.com);
  - b) call the dedicated anonymous telephone hotline: +971 2 333 89 55;

- c) complete the online form (with the option to remain anonymous):  
<https://www.adgm.com/contact-us/speaking-up>; or
- d) send a letter by mail to: ADGM Compliance, Office of Legal Affairs, Governance and Compliance, ADGM Authorities Building, ADGM Square, Al Maryah Island, PO Box 111999, Abu Dhabi, UAE.

- 5.3 Suppliers are expected to cooperate with ADGM in resolving any reported concerns and observed or suspected violations. This may include providing relevant documentation, access to information, or responding to reasonable requests by ADGM. All such cooperation is treated as strictly confidential.
- 5.4 ADGM strictly prohibits retaliation of any kind against anyone who reports in good faith. Suppliers are strongly encouraged to adopt the same approach within their own organisations and supply chains.

## **6. Violation**

- 6.1 Suppliers and their employees are responsible for complying with this Supplier Code. Any failure to comply with this Supplier Code may negatively affect a Supplier's business relationship with ADGM, including the possibility of suspension, termination of contracts, or blacklisting.
- 6.2 ADGM Procurement & Contracts will monitor adherence to this Supplier Code in their interactions with ADGM. Any suspected or confirmed breaches will be reported to the ADGM Office of Legal Affairs, Governance, and Compliance and Enterprise Risk Management for appropriate action.
- 6.3 ADGM reserves the right to investigate any violation of this Supplier Code in their interactions with ADGM and to conduct audits when ADGM has reasonable grounds to believe a violation has occurred (or upon receipt of notice of such violation).
- 6.4 If a Supplier becomes aware of a violation of this Supplier Code in their interactions with ADGM – whether deliberate or unintentional – or any other illegal or unethical conduct, they are expected to report the matter through the designated reporting channels listed in Section 5 of this Supplier Code.

## **7. Review and Approval**

- 7.1 This Supplier Code should be reviewed and updated by ADGM Procurement & Contracts on a regular basis of – at least once every two (2) years.
- 7.2 Suppliers should refer to [www.adgm.com](http://www.adgm.com) to ensure they are complying with the latest most recent version of this Supplier Code, which is available at [www.adgm.com](http://www.adgm.com).

## **8. Assistance**

- 8.1 If you have any questions about this Supplier Code, or need any assistance with matters relating to it, contact ADGM Procurement & Contracts via ([supplier.support@adgm.com](mailto:supplier.support@adgm.com)).