



2024 Corporate Social  
Responsibility Report

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# About this Report

This report encompasses the operations and activities of the ADB SAFEGATE Group, which maintains a presence in over 40 locations across all continents. The group operates seven primary offices that manage a comprehensive range of processes, including product management, research and development, sales, supply chain, production, project management, services, marketing, finance, IT, quality assurance, environmental management, and health & safety management. This report provides a thorough overview of the entire ADB SAFEGATE Group.

## REPORTING FRAMEWORK AND ASSURANCES

ADB SAFEGATE is committed to enhancing the comprehensiveness and consistency of our corporate social responsibility report. By aligning with selected Global Reporting Initiative (GRI) Standards and the European Directive on non-financial and diversity disclosure, we aim to ensure compatibility with other organizations. While we are in the early stages of adopting GRI Standards, we recognize that achieving full compliance will be a continuous journey.

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# Letter from the CEO



**Laurent Dubois**  
Chief Executive Officer,  
ADB SAFEGATE

Reflecting on 2023, I am proud of ADB SAFEGATE's commitment to sustainability and innovation. Our journey towards a greener future is central to our mission.

The global focus on Environmental, Social, and Governance (ESG) issues has intensified, with Europe leading ambitious targets for climate neutrality by 2050. ACI Europe's dedication to net-zero carbon emissions mirrors the aviation industry's resolve. At ADB SAFEGATE, we understand that innovation, efficiency, and sustainable practices are crucial.

We are committed to becoming certified carbon neutral by 2024. Our carbon reduction strategy aims to cut our own carbon footprint by 40% by 2030, reflecting our dedication to long-term sustainability.

Our CSR strategy, aligned with the UN Global Goals for Sustainable Development, extends beyond our products and services. It encompasses environmental stewardship, societal contributions, and robust governance. Our stakeholders rely on us to deliver sustainable solutions, and we are dedicated to creating value through effective corporate responsibility management. We build it on three foundational pillars:

## **Driving Sustainability in Airport Operations**

We are dedicated to leading the green transition in airport operations with innovative solutions: from energy-efficient lighting systems to advanced airfield solutions, we are innovating to help airports operate more sustainably.

## **Cultivating a Rewarding Work Environment**

Our employees are our greatest asset. We prioritize their professional growth and well-being through comprehensive health, safety and development program.

## **Forming Strategic External Partnerships**

We understand the power of collaboration in amplifying our sustainability efforts. By forging strategic partnerships with industry leaders, non-profits, and governmental bodies, we are driving meaningful change and fostering innovation in airport operations.

This report highlights our 2023 achievements and the positive impact of our solutions, processes, and initiatives. The challenges we face only strengthen our resolve and underscore the importance of sustainability in our strategy.

Thank you for your continued support and trust in ADB SAFEGATE as we work towards a sustainable and resilient future.

# 1.0. ADB SAFEGATE TODAY

## Global State of Airport Industry in 2023

In 2023, the airport industry continues to navigate a complex landscape shaped by ongoing global economic challenges, the aftermath of the COVID-19 pandemic, and an increasing emphasis on sustainability and technological innovation. The resilience of the industry has been tested, but it has also demonstrated remarkable adaptability and growth.

### **Recovery and Growth**

The global airport industry has seen a significant rebound in passenger traffic and cargo operations as travel restrictions have eased and vaccination rates have increased. Airports worldwide are experiencing a surge in operations, driven by pent-up demand for travel and the gradual return of international tourism. However, this recovery is uneven, with some regions rebounding faster than others due to varying levels of economic stability and public health conditions.

### **Sustainability and Environmental Responsibility**

Sustainability has become a central focus for the airport industry. With the European Union and other regions setting ambitious targets for carbon neutrality by 2050, airports are under pressure to adopt eco-friendly practices. Efforts to reduce carbon emissions, improve energy efficiency, and implement sustainable infrastructure are gaining momentum. Airports are investing in renewable energy sources, electric ground support equipment, and green building certifications to meet these goals.

### **Technological Advancements**

The adoption of advanced technologies is transforming airport operations. Automation and robotics are being increasingly utilized for tasks such as baggage handling, aircraft maintenance, and passenger services. The Internet of Things (IoT) is enhancing operational efficiency through real-time monitoring and data analytics. Digital transformation initiatives, including the use of cloud-based systems, big data, and artificial intelligence, are optimizing resource management and improving the passenger experience.

### **Safety and Security**

Safety and security remain paramount concerns for the airport industry. The development and deployment of new technologies, such as biometric screening, advanced threat detection systems, and cybersecurity measures, are enhancing the safety of passengers and staff. Airports are also focusing on health security, implementing measures to prevent the spread of infectious diseases and ensure a safe travel environment.

### **Economic and Regulatory Challenges**

The airport industry faces several economic and regulatory challenges. Rising operational costs, fluctuating fuel prices, and labor shortages are putting pressure on airport finances. Additionally, airports must navigate a complex regulatory environment, complying with stringent safety, environmental, and quality standards to obtain necessary certifications and approvals.

### **Regional Variations**

The recovery and growth of the airport industry vary significantly across different regions. In North America and Europe, airports are experiencing a robust recovery, driven by strong domestic travel demand and government support. In contrast, some regions in Asia and Africa are facing slower recovery due to ongoing public health challenges and economic instability. Regional cooperation and investment in infrastructure are crucial to bridging these gaps and ensuring a balanced global recovery.

## Future Outlook


The future of the airport industry looks promising, with continued investments in sustainability, technology, and infrastructure. Airports are expected to play a pivotal role in the global transition to a low-carbon economy, contributing to climate goals and enhancing their resilience to future disruptions. Collaboration between industry stakeholders, governments, and international organizations will be essential to address the challenges and seize the opportunities ahead.

In summary, the global airport industry in 2023 is characterized by a dynamic recovery, a strong focus on sustainability, rapid technological advancements, and ongoing economic and regulatory challenges. The industry's ability to adapt and innovate will be key to its continued success and contribution to a sustainable and resilient future.

# Our Performance On Key ESG






## Environment, Social and Governance Indicators

### MATERIAL ESG ISSUES

	Key performance indicator	Aspirations	Results (2023)	Status	Impact	Explanation
Compliance	No. of legal and regulatory fines and settlements associated with incidents of: <ul style="list-style-type: none"> <li>Environmental non-compliance</li> <li>Corruption or bribery</li> <li>Labor law violations</li> </ul>	Zero	Zero	 On track	Environmental impact Reputational damage Brand integrity Cost savings	As per previous years, no issues reported during FY23.
Energy Management	Total energy consumed % from renewable sources	Improve	FY22 (electricity & gas) = 4915 MWh of which 33% is renewable assimilated in this case to renewable source.	 On track	Environmental impact Cost savings	Since 2022 the data collection covers more than 95% of our FTE's. In 2022 27% of the energy reported in scope 1 and 2 of our carbon footprint calculation was from renewable energy. Despite the increasing of the group activities, this figure increased to 33% in 2023 thanks to drastic energy consumption reduction measures, investments in more efficient plants and equipment and purchasing of additional certified green electricity.
Energy Management	Waste from operations <ul style="list-style-type: none"> <li>% hazardous</li> <li>% recycled</li> </ul>	<2% hazardous waste, 100% recycled. Non-hazardous waste (wood, metal & cardboard/ paper) 100% recycled	a) 3.65 tons hazardous waste produced. 99% recycled b) Non-hazardous waste: 171 tons generated-up by 17 tons vs. 2022, 90% recycled.	 On track	Environmental impact Cost savings	Epoxy resins, paints and solvents will remain a key element of production needed in the lights. New products have a more sustainable design, requiring less epoxy resins. Increasing of non-hazardous explained by increasing of production volumes and group activity

# Our Performance On Key ESG

## Environment, Social and Governance Indicators

MATERIAL ESG ISSUES	Key performance indicator	Aspirations	Results (2023)	Status	Impact	Explanation
Packaging	% of packaging that is recyclable	65%	90%	 On track	Environmental impact Reputational damage Brand integrity  Cost savings	Excepted for specific electronic components, and protection plastic film, the packaging material used is cardboard and/or wood. Material used to pack AGL and Apron is from a recycled source when available.
	% packaging made from recycled materials	50% for AGL Products	65%	 Ongoing		
Worker safety	Occupational accident frequency rate with lost time <ul style="list-style-type: none"><li>FTEs</li><li>Contract employees</li></ul>	0	0 accidents recorded in 2023	 Ongoing	Improvement employee engagement, healthy workforce focus, reduced insurance costs, brand integrity	ADB SAFEGATE continues to maintain a safe workplace policy and training improvement system. The global QHSE employee and sustainability framework engagement implemented in 2021 is on-going and showing excellent results for the second year in a row.
	No. of major accidents: <ul style="list-style-type: none"><li>FTEs</li><li>Contract employees</li></ul>	0	0 OSHA recordable incidents - contract employees not included	 Ongoing		
Labor & working conditions	Employee turnover <ul style="list-style-type: none"><li>Voluntary and</li><li>Involuntary</li></ul>	Employee turnover target is 9%	14%	 To be improved	Improved employee engagement, healthy workforce, stability, reduced recruiting and training costs	Efforts are ongoing to improve engagement and retention of employees, already seeing part of the benefits of the programs in place.




# Our Performance On Key ESG

## Environment, Social and Governance Indicators

MATERIAL ESG ISSUES	Key performance indicator	Aspirations	Results (2023)	Status	Impact	Explanation
Staff training	% of executives of our (Senior Leadership Team (SLT) that have received training in anti-bribery and corruption	100%	100%	 On track	Improved employee engagement, healthy workforce focus, reduced insurance costs, brand integrity	Since 2018, anti-bribery & anti- corruption courses are part of the executive onboarding process, and refresher training is conducted regularly
Supply Chain/Quality Management	Number of key suppliers subject to EHSS audit	33 per year	65 audits were performed on a global level	 On track	Increased transparency, brand integrity	In 2023 a brand new ESG audit program was implemented for our main suppliers.

# Our Performance On Key ESG

## Environment, Social and Governance Indicators

MATERIAL ESG ISSUES	Key performance indicator	Aspirations	Results (2023)	Status	Impact	Explanation
Product sustainability	<p>Examples of new products or services that have been introduced that incorporate environmental attributes</p> <p>% of sales (or CAGR of sales) attributed to these products</p>	<ul style="list-style-type: none"> <li>To design innovative products and solutions to deliver environmental, operational, and safety benefits to customers</li> <li>To deliver quantifiable energy and emissions savings that meet the needs of airports and airlines who are committed to reducing their environmental impact while maintaining growth &amp; efficiency</li> </ul>	<ul style="list-style-type: none"> <li>Company increases the AGL Axon portfolio with elevated lights. Both models (inset and elevated) are the first products in the AGL industry with a full Carbon footprint calculation. The concept allows to increase the life expectancy of the products by min 70% if all the conditions are met.</li> <li>In parallel with the development of second generation of Low Harmonic regulators launched in 2022, the company is also developing the latest generation of thyristor based regulator with an minimum expected efficiency of at least 95% to optimize power consumption and decrease maintenance interventions</li> <li>The Airside 4.0 concept aims to reduce airport operations' carbon footprint through the use of advanced technology like the LINC 360 ILCMS units. These units facilitate "Follow-the-Green" technology, which optimizes taxi routes and in turn reduces fuel consumption and the need for de-icing products and environmental impact. Automated apron management reduces aircraft waiting times, fuel consumption, and greenhouse gas emissions while cutting energy use and operational costs. Overall, these advancements improve airport efficiency, reduce congestion and delays, and enhance the passenger experience, contributing to a more sustainable and eco-friendly airport environment.</li> <li>The ongoing development and enhancement of services provided by our regional centers for aftermarket support have significantly improved response times for our customers. This has drastically reduced the frequency and duration of travel for our service engineers, thereby lowering their carbon footprint. Additionally, the implementation of a centralized contact center has optimized human resources, ensuring efficient airport operations and minimizing time loss.</li> </ul>	 <p>On track</p>	<p>Airside 4.0 roadmap launched that includes all LED products with sensor technology and bidirectional communication capability to bring operational efficiency to the airfield and enhance situational awareness, testing launched with pilot technology partners to understand qualitative impact</p> <p>Airfield product design focused on products that can be compatible with future technology, allowing customers to refurbish or add on to current install base versus buying, therefore decreasing waste</p> <p>Company wide phase out priority to support both internal and external goals to simplify the supply chain, and move customers to more sustainable technology, such as LEDs, and to products with better installation longevity due to serviceability and upgrades</p>	<p>Since 2022, four AGL products have undergone comprehensive carbon footprint calculations as part of our standard product development process. ADB SAFEGATE has continuously improved its Product Line Management (PLM) Procedure to incorporate circular economy principles, aiming to reduce carbon footprints across all stages—from design and commissioning to purchasing, production, waste management, packaging, and transportation. This market-driven approach underscores the importance of minimizing carbon footprints and enhancing efficiency as key factors in product selection.</p> <p>The year 2022 marked a significant milestone for our industry with the integration of carbon footprint calculations into the PLM process. Moving forward, this initiative will be gradually extended to encompass the entire ADB SAFEGATE product portfolio.</p> <p>Our primary objective with airfield ground lighting solutions, apron management, tower, and airport systems is to reduce the number of aircraft movements between landing and the gate, thereby decreasing fuel consumption. By focusing on these efficient solutions, we aim to maximize both economic and environmental sustainability for our clients.</p> <p>In summary, ADB SAFEGATE is committed to advancing sustainability through innovative product development and operational improvements, ensuring that our solutions contribute to a greener and more efficient aviation industry.</p>

# 2.0. OUR POLICY AND APPROACH

At ADB SAFEGATE, we are dedicated to fostering positive social and environmental impacts through our corporate social responsibility (CSR) initiatives. Our core values and ESG Policy reflect this commitment, guiding our efforts to enhance safety, sustainability, community support, and compliance.

Our vision, mission, and values serve as the highest-level principles, directing work and conduct across the organization. Adhering to these principles, ADB SAFEGATE conducts an annual corporate strategy review, adjusting its business plan as needed based on new market developments. We acknowledge the importance of integrating CSR considerations into strategic planning and the positive influence this can have on the environment and society.

In 2023, ADB SAFEGATE implemented new ESG policies and strategy and remains dedicated to a sustainable and socially responsible future for the airport industry. Moreover, the company's people-centric policies and commitment to giving back to the community further demonstrate its dedication to making a lasting, positive impact.

## Core Values



**DRIVEN BY CUSTOMERS**



**SET THE BAR HIGH**



**OWN IT**



**WIN TOGETHER**



**INSPIRE TALENT**



## Vision

A future of seamless, sustainable and safe airport operations



## Mission

We lead through innovation to deliver smart, cost-effective and distinctive airside solutions and services to help our customers achieve more

# 3.0. OUR COMPANY

## 3.1 OPERATIONS

### 3.1.1 LOCATION OF HEADQUARTERS

ADB SAFEGATE BV Leuvensesteenweg 585 1930 Zaventem, Belgium

**Phone:** +32 2 722 17 11 | **Fax:** +32 2 722 17 64







### 3.1.2 LOCATION OF OPERATIONS

ADB SAFEGATE operates in 40 locations across all major continents. Our seven main operational offices encompass a wide range of processes, including product management, systems engineering, development and technical laboratories, sales, supply chain, production, project management, after-sales services, marketing, finance, IT, quality, environment, and health & safety management. This extensive global network ensures that we can deliver comprehensive and efficient solutions to our clients worldwide.

#### These seven locations are:

ADB SAFEGATE BV in Zaventem, Belgium

ADB SAFEGATE Americas LLC in Columbus, USA

ADB SAFEGATE Germany GmbH in Mannheim, Germany

ADB SAFEGATE Airfield Technology Ltd in Tianjin, China

ADB SAFEGATE Austria GmbH in Graz, Austria

ADB SAFEGATE Sweden AB in Malmö, Sweden

ADB SAFEGATE Airport Systems UK Ltd in Manchester, United Kingdom

The other locations comprise our sales offices (legal entities and branches) that include staff for project management and after sales support and project branches where the extensive project management process is applied.

Abu Dhabi	Graz	Mannheim
Anncy	Hamburg	Melbourne
Amsterdam	Helsinki	Miami
Athens	Hong Kong	Minneapolis
Beijing	Horsens	New Delhi
Brussels	Houston	Paris
Burlington	Istanbul	Riyadh
Christchurch	Johannesburg	Rome
Columbus	Kuala Lumpur	Sacramento
Denver	Larnacka	Singapore
Doha	London	Taipei
Dubai	Madrid	Thessaloniki
Eckental	Malmo	Tianjin
	Manchester	



### 3.1.3 MANUFACTURING SITES

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ADB SAFEGATE is committed to expanding and modernizing its manufacturing capabilities to better serve our customers and reduce our energy footprint. We operate four strategically located production sites in Brussels, Belgium; Columbus, OH, USA; Tianjin, China; and Mannheim, Germany. These locations are chosen to be closer to our suppliers and customers, thereby decreasing our energy footprint.

We are also investing in increasing and modernizing our manufacturing plants. Our global team is being built around Centers of Excellence by technical competence. We have expanded our capabilities with the opening of our China Product Development Center and manufacturing facility in Tianjin, China. Additionally, in March 2023, we inaugurated a new U.S. headquarters complex in Columbus, Ohio, which includes office space, manufacturing facilities, and an innovation center.

Furthermore, we have launched an ambitious project to modernize our headquarters with the goal of achieving a carbon-neutral facility. These investments underscore our commitment to growth, innovation, and sustainability in the aviation sector.

### 3.1.4 OWNERSHIP AND LEGAL FORM

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Since 2017, ADB SAFEGATE has been owned by the Carlyle Group, one of the world's largest and most influential global investment firms. The Carlyle Group is renowned for its extensive portfolio and expertise in various industries, providing strategic support and resources to drive growth and innovation. This partnership underscores ADB SAFEGATE's potential as a leading solutions provider in the aviation sector, enabling us to continue our trajectory of high growth and industry leadership.

### 3.1.5 ESG COMMITTEE

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To ensure the longevity of its CSR and ESG initiatives, ADB SAFEGATE announced the creation of an integrated ESG Committee in 2023. The committee is responsible for overseeing and giving guidance to the Company's Board on key global CSR/ESG Matters and/or as to the general evolution of the CSR/ESG landscape. It will do this in relation to the Company itself and will also advise the Company representatives on how they can use their roles in the governance of the businesses partially or wholly owned by the Company to champion further progress within those businesses on CSR and ESG Matters.

Led by the CEO, the committee consists of 6 members and relies on a network of CSR/ESG correspondents, including Strategy and Marketing officers from Global Business Units and Major Countries, as well as designated employees in the Management Committees of key cross-functional departments.

This structure aims to embed CSR/ESG culture into strategic decision-making processes. By integrating ESG and CSR into its core operations, ADB SAFEGATE ensures that its commitment to sustainability, inclusivity, and safety is reflected in every aspect of its business.

### 3.2 BUSINESS MODEL, MARKETS SERVED

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At ADB SAFEGATE we are used to collaborating with the different stakeholders present in Airport Business (operators, airlines, air navigation service provider, etc). We identify and jointly address performance bottlenecks using integrated solutions that enhance airport and airline performance. Our comprehensive solutions encompass all aspects of the process, from approach to departure – including airport traffic handling and guidance, airfield lighting, tower-based traffic control systems, airport systems, intelligent gate and docking automation, as well as various aftermarket services and support

Employing over 1,200 personnel from 55 nationalities across 40 countries, we cater to more than 2,700 airports in over 175 countries worldwide. Our clientele ranges from the busiest and largest airports like Atlanta, Beijing, Dubai, Heathrow, Charles De Gaulle, Amsterdam, Frankfurt, Istanbul, New Delhi, and Changi, to rapidly expanding airports across Asia and Africa. As a trusted partner, ADB SAFEGATE collaborates with the top 50 global airports.



**LAURENT DUBOIS**  
Chief Executive Officer



**ERIK VAN OCKENBURG**  
Chief Financial Officer



**JOE POKOJ**  
Chief Operating Officer



**REGARDT WILLER**  
Chief Marketing Officer  
and VP Business Development & Innovation



**DOMINIC COTE VAILLANCOURT**  
Chief of Staff



**MEGAN MUELLER**  
VP, Global HR



**THORBEN BURGHARDT**  
Chief Technology Officer  
and EVP Business Lines



## AIRFIELD



### Safe, efficient & sustainable 2500+ installed base

- All-LED airfields that are fully compliant, well-designed and greener
- Widest range of intelligent LED lighting, power management, follow the greens and addressable guidance signs
- Smoother integration with related systems.
- Airside 4.0 journey focuses on the digitalization and interconnectivity of hardware and systems to bring information to all stakeholders in a usable and portable way

## APRON



### Automated & efficient gate operations

- Over 12,000 installations at over 300 airports
- Shorter turnaround times, safer and more efficient gate operations, and more comprehensive apron management
- ICAO-compliant, automated platforms for safe and efficient docking, apron management system, LED apron floodlighting
- Enhanced integration and advanced technologies including fully-automated aircraft

## TOWER



### Tower: Intelligent routing & guidance

- Solutions deployed in 40+ towers
- ATC and apron tower solutions enabling full control over aircraft and vehicle movement from approach to departure
- Scalable, cost-effective and future-proof traffic management for the most efficient way from touchdown to gate
- Seamless integration with new or existing related systems
- OneControl Integrated Controller Working Position brings all systems onto a single screen

## SERVICES

### **Services: Greater availability, safety and performance**

- More than 20 years in maintenance services.
- 24/7 service desk
- 1,100+ SLA and maintenance agreements
- Expert services from airfield design to audit and survey, project management and a full maintenance portfolio to guarantee continuity of airside operations.
- New cloud-based airside asset management tool, ALIS, brings airside maintenance into the digital era, helping airports plan and schedule airside asset maintenance easily and effectively

## TERMINAL

### **Leverage data for actionable insights on operational performance**

- Analyzing the data across all systems to optimize operational efficiency, throughput and costs.
- Airport systems addressing a spectrum of processes - data management, flight information display, billing and baggage management to resource optimization, system integration and operational improvement – to enhance operational performance, to make collaborative decision making a reality.

## WEATHER

### **Accurate and timely weather data to mitigate risk and allow more landings and take-offs**

- Reducing weather-based risks
- 6,000+ weather sensors at 1,000+ airports worldwide
- Systems in use at the world's largest airports
- Tens of millions of safe aircraft movements each year
- ICAO-compliant and FAA Certified airport weather systems
- Turnkey solutions – from concept/design to installation/maintenance and training/support

We bring together our offerings across these domains to improve airport performance. By enabling all parts of the airport to work together, from approach to take-off, we help increase aircraft movements in a safe, efficient and sustainable way. We use an operational and customer-first, consultative approach with market and situational analysis, to arrive at the best, most cost-effective and future-proof solution in partnership with our customers.



## Investing in the future



Building our team globally around Centers of Excellence by technical competence



Establishing key customer innovation partnerships to ensure our products are solving critical challenges



Delivering sustainable products that enable our customers to continuously improve aviation's ecological footprint



Investing in talent, R&D, manufacturing, and quality



Developing creative solutions to customer challenges from our three innovation centers



Increasing manufacturing space by over 15,000 m<sup>2</sup> to expand our capabilities



#### 4.0. FOCUSED INTO THE FUTURE: SUSTAINABILITY IS A MUST

We are committed to sustainability across all facets of our operations. Our internal policies and processes promote green practices within our business and encourage our employees and suppliers to adopt sustainable operations. Additionally, our energy-efficient product portfolio empowers customers to minimize their environmental impact. We believe that sustainability is essential for the aviation industry, and our initiatives reflect this belief by fostering a culture of environmental responsibility both internally and externally.



##### **PIONEERING SUSTAINABLE DIGITAL TRANSFORMATION IN AVIATION**

ADB SAFEGATE is leading the charge in digital transformation with a strong focus on sustainability and corporate social responsibility (CSR). Since the early 2000s, we've developed products that significantly lower energy consumption and CO2 emissions. Our mission is to optimize airport operations through sustainable solutions like SESAR's Follow the Greens (FTG), which can cut fuel burn and carbon emissions by up to 40%.

Our latest innovation, the LINC 360 ILCMS, supports "Follow-the-Green" technology, optimizing aircraft taxi routes to reduce taxi time, fuel consumption, and de-icing needs. This system, part of our comprehensive Airfield 4.0 concept, integrates smart LED technology and advanced apron management to create more efficient, eco-friendly airfields.

ADB SAFEGATE's commitment to sustainability is further demonstrated by our use of recyclable components and the elimination of harmful substances in our products. Our intelligent lighting control systems save up to three minutes of taxi time per movement, further reducing emissions. By driving digital transformation, we are not only enhancing airport efficiency and safety but also significantly reducing environmental impact.



## THE MOST SUSTAINABLE PORTFOLIO IN AVIATION SOLUTIONS

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At ADB SAFEGATE, our portfolio stands out as the most sustainable in the aviation industry, surpassing other AGL, tower, and apron suppliers in environmental responsibility.

### Advanced Airfield Ground Lighting (AGL)

Our AGL solutions feature smart LED technology, drastically reducing energy consumption and maintenance costs. Designed for easy recycling, our products incorporate intelligent control systems to optimize lighting usage, further cutting energy consumption and carbon emissions.

### Sustainable Tower Solutions

Our tower solutions leverage advanced software and automation to enhance operational efficiency while minimizing energy usage. Scalable and adaptable, these systems ensure long-term sustainability as airport needs evolve.

### Eco-Friendly Apron Management

Our gate management systems streamline airport operations, reducing aircraft waiting times and fuel consumption. Fully automated apron management minimizes the need for ground support equipment, and our systems support the use of electric ground vehicles, contributing to a cleaner airport environment.

## MANAGEMENT APPROACH

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ADB SAFEGATE is committed to maintaining the highest standards of quality, environmental responsibility, and data security. We are certified under ISO 9001 and ISO 14001, and our headquarters in Belgium and plant in Sweden hold ISO 45001 certification. Additionally, we have achieved ISO 27001 certification, ensuring that data in the cloud is correctly protected.

Our quality and environmental policies, processes, and systems are aligned with these globally recognized standards. We have well-defined goals, systems, and KPIs to effectively measure and improve our performance in these areas. Our initiatives include replacing energy-intensive systems with more efficient power sources, enhancing waste management practices, and other sustainability efforts aimed at reducing our carbon footprint.

This comprehensive approach reflects our sustainability philosophy, emphasizing continuous improvement and a strong commitment to reducing environmental impact while ensuring data security.

## CHECKS AND AUDITS

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Our premises are regularly inspected and audited to ensure full compliance with environmental and health and safety regulations. These audits cover various aspects, including air emissions, heating systems, air conditioning, and waste management. By thoroughly examining these areas, we ensure that we meet all current standards and identify opportunities for improvement. The findings from these inspections guide us in making necessary investments and implementing activities to enhance our sustainability and safety practices.

## 4.1. PROMOTING ENVIRONMENTAL SUSTAINABILITY

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ADB SAFEGATE has significantly reduced its direct CO2 emissions, achieving a significant reduction of its emissions between 2018 and 2023, even amidst the challenges posed by the Covid-19 pandemic. The company's innovative capabilities enable it to create solutions that minimize environmental impacts for its clients, such as energy-efficient airfield lighting and apron systems.

Recognizing the urgency of climate issues, ADB SAFEGATE has committed to even more ambitious targets. During the annual ESG committee meeting held in August 2023, the company unveiled a new roadmap, aiming to become climate neutral by 2024, and defining an ambitious plan to cut direct operational emissions by 40% in total by 2030, with the ultimate goal of achieving net-zero emissions by 2050. This roadmap will be submitted for certification in 2024 according to the CNG (Climate Neutral Certification) Program. These goals are achievable due to the company's strong focus on innovation and the increasing proportion of eco-friendly products in its portfolio. Currently, 100% of new AGL products are designed with environmental considerations in mind, ensuring sustainability throughout their lifecycle.

## 4.2. PRODUCT SUSTAINABILITY AND CIRCULAR ECONOMY

### REFURBISHMENT OF PRODUCTS

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ADB SAFEGATE successfully completed a major refurbishment project in the Netherlands, where over a thousand inset and elevated lights were uninstalled, refurbished, and reinstalled within just four weeks. This initiative underscores our commitment to sustainability and the UN Sustainability Goals by reducing waste and extending the lifespan of our products. Refurbishing the lights saved an estimated 74 tonnes of CO2 emissions, equivalent to driving a petrol car between Brussels and Amsterdam 1,479 times, and achieved an 80% carbon savings compared to producing new fixtures.

The refurbishment process involves reusing carbon-intensive parts, recycling components, and ensuring refurbished lights meet the same quality standards as new ones. This project was made possible through the collaboration of multiple departments, validating the feasibility of refurbishment, and scaling up the process to meet tight deadlines.

### 4.3. ENERGY EFFICIENCY AND CARBON EMISSIONS

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ADB SAFEGATE is dedicated to reducing its carbon footprint and enhancing energy efficiency across all aspects of its operations. A significant part of our emissions reduction strategy focuses on modernizing our manufacturing plants to be more energy-efficient and better insulated. By investing in state-of-the-art technologies and infrastructure, we aim to minimize energy consumption and reduce greenhouse gas emissions.

We are also committed to using green energy sources whenever possible, further decreasing our reliance on fossil fuels and lowering our overall carbon emissions. In addition, we have integrated the use of electric vehicles into our fleet, reducing emissions from transportation and contributing to cleaner air.

To minimize the environmental impact of business travel, we have implemented policies that encourage virtual meetings and remote collaboration, significantly reducing the need for air and road travel. Furthermore, we prioritize working with suppliers who share our commitment to sustainability, ensuring that our entire supply chain aligns with our environmental goals.

By focusing on these key areas—energy-efficient and insulated plants, green energy usage, electric vehicles, reduced business travel, and sustainable supplier selection—ADB SAFEGATE is making substantial strides in reducing its carbon footprint and promoting a more sustainable future for the aviation industry.

### 4.4. WASTE AND WATER MANAGEMENT

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ADB SAFEGATE is dedicated to sustainable waste and water management practices. Our waste management strategy emphasizes recycling through advanced segregation processes, categorizing waste into paper, wood, metal, and more. We also run waste reduction programs to minimize waste generation at the source.

In water management, we adopt innovative solutions to reduce consumption, including using rainwater for domestic purposes where feasible. Additionally, we ensure that our operations do not involve hazardous substances, further protecting the environment.

Our active recycling policy promotes the recycling of all materials used during production, including wood, metal, packaging, and chemical waste. These materials are managed by specialized and accredited companies that recycle all components in accordance with local governmental regulations and align with the ISO 14001 process.



## 5.0 RESPECT FOR PEOPLE, DIVERSITY AND HUMAN RIGHTS

Employees are critical to our success at ADB SAFEGATE. We strive to engage our employees, creating an environment where they are inspired to innovate, contribute, and grow, both personally and professionally. As a global company, we are more than 1,200 employees from 55 nationalities across 40 offices worldwide. We view this diversity as our strength and are committed to inclusive practices that ensure fair and equal treatment of our employees. We encourage our employees, irrespective of their roles, to participate in our company's innovation process through initiatives such as an Ideas Portal, and we engage with our employees to create a work culture that values human talent.

With our organizational structure, there is an even greater emphasis on innovation. Our R&D teams are focused around core business lines to pursue and enable innovation.

### 5.1. LABOR AND WORKING CONDITIONS

As one of our core values, *Win Together* reinforces the importance we place on collaboration. We strive to create an inclusive work environment where everyone feels valued, respected, and supported. This includes promoting a culture that encourages open dialogue, collaboration, and the exchange of ideas. We also create a work environment where our employees feel free to engage in collective bargaining agreements.

### 5.2. HEALTH AND SAFETY

Our extensive health and safety policy and management systems promote occupational safety and accident prevention to ensure a safe and healthy working environment. Safety and health in our company are a vital part of every operation. Without question, safety and health of all employees, contractors, vendors and the environment, is every employee's responsibility. This responsibility is shared across all levels of the organization.

We maintain safety and health programs conforming to the best practices of our industry. To be successful, such programs must embody the proper attitudes toward injury and illness prevention on the part of department heads, managers, supervisors and employees. It also requires cooperation in all safety and health matters, not only between management and employees, but also between employees and their co-workers. Only through such a cooperative effort can an effective safety and health program be established and preserved.



The safety and health of every employee is the highest priority. Our management accepts responsibility for providing a safe working environment and employees are expected to take responsibility for performing work in accordance with our safe standards and practices. Safety and health will only be achieved through teamwork.

Everyone must come together in promoting safety and health and taking every reasonable measure to assure safe working conditions within the company and the environment. We do believe that ZERO accidents, injuries, and spills/environmental releases are attainable.

Safety is our first priority! While cost and quality service to the customer are part of our core business values, we will not compromise safety for their sake. Our core safety values are: bodily injury prevention, protection of others through self-awareness and environmental cleanliness.



## We support these values with the following principles:



- All accidents are preventable and all hazards controllable
- Working safely is a condition of employment
- Safety is everyone's responsibility
- People will be trained to perform their jobs safely prior to being assigned the task
- Each location will have an active Safety Management Plan that is equivalent to those for production and quality
- Audits are essential for maintaining safety performance





### 5.3. OUR PEOPLE: OUR MOST IMPORTANT ASSET

#### Helping employees to achieve total wellbeing

We recognize the global challenges with navigating the demands of work and personal life on a regular basis. It's important at ADB SAFEGATE to provide the resources to ensure our employees feel supported and their well-being prioritized.

ADB SAFEGATE provides an Employee Assistance Program globally, in partnership with a specialist provider, to connect employees with highly trained professionals and experts in managing stress caused by physical, emotional or practical issues. This comprehensive program provides unlimited access 24/7 including consultation counselling, information, resources and referrals to services in employee locations, for support in areas such as wellbeing, family matters, relationships, debt management, workplace issues, consumer rights and more.

#### Employee Engagement & Feedback

Communicating and hearing from employees is important for continuous improvement. To ensure employees stay informed we host global executive-led town halls. We also execute an annual all-employee pulse survey, and had consistent employee participation over 65% of employees over the prior three years. Over 80% of employees have indicated happiness at work in addition to a result in a positive Net Promoter Score over that same time.



## 5.4. DIVERSITY AND EQUAL OPPORTUNITY

We maintain a strict non-discrimination policy and guarantee fair and equal treatment of all employees no matter their race, gender, nationality, religion or sexual orientation. Additionally, through our Diversity, Equity and Inclusion Policy we expand upon our commitments through established guidelines and principles, to foster and sustain a diverse and inclusive culture across all international locations.

### GENDER DIVERSITY AT THE TOP

Closing the gender gap in the aviation sector is one of the industry's biggest challenges, as is the absence of women in leadership roles. As per reports, only 6.5% of Fortune 500 CEOs are women, the number is much lower for aviation at 3%. ADB SAFEGATE recognizes the need to improve gender representation in the industry.

While the multicultural environment is a plus, we recognize a need to improve our gender distribution which shows 20% females in the workforce to 80% male employees. Heavy duty jobs in assembly, technical support and service make up less than 30% of our workforce, while jobs in non-physical activities such as HR, IT, Finance and Administration, R&D, System Engineering, Project Management and Sales & Marketing make up almost 70% of the workforce. Through our efforts in inclusive hiring practices we will continue our commitment to creating a diverse and inclusive work environment.






## 5.5. TALENT MANAGEMENT

As one of our core values, *Inspire talent* is our commitment to invest and promote the growth of our employees. At ADB SAFEGATE we have several practices in place to foster the growth, development and advancement of our employees. Through our performance management process, we encourage on-going feedback through quarterly review discussions. For employees who aspire to grow, develop and advance we encourage individual development plans. With the investment of outside resources and online learning, employees have access to training to support their development. Additionally in 2023 we successfully launched a global leadership development program to further develop our people-leaders. We also support internal mobility, supporting employees movement across functions and regions.



# 6.0 RESPONSIBILITY AND INTEGRITY IN BUSINESS CONDUCT

## HIGHLIGHTS

<p>ISO 9001 global multisite certified company with, ISO 14001, 45001 &amp; 27001 with certified offices in Zaventem, Malmö, Graz and Manchester.</p>	 <p>Compliance with the laws and regulations of every country in which we operate</p>	 <p>Executives attend at least one ethics training session bi-annually</p>	 <p>Compliance Review Committee</p>	 <p>Anti-corruption policy</p>	 <p>Export control policy</p>
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### 6.1 COMPLIANCE AND CODE OF CONDUCT FOR EMPLOYEES

ADB SAFEGATE takes compliance very seriously and respects applicable local and international laws ranging from anti-corruption, anti-trust and anti-discrimination, to laws on financial ethics and responsibility, environmental protection, labor, human rights and privacy, as well as fair business conduct. We aim to comply with the regulations of every country in which we operate.

Our Compliance Review Committee meets periodically to review and update compliance and business conduct guidelines signed by all employees and business partners. These guidelines determine our way of working with customers, partners and vendors and guarantee that compliance and business ethics are adhered to in all our business dealings and form the basis of every sale or project.

### 6.2 SUPPLY CHAIN MANAGEMENT

ADB SAFEGATE has created a supplier code of conduct (refer appendix) which outlines the requirements our key vendors must comply with, and these are closely linked to ADB SAFEGATE's overall business conduct guidelines

We also conduct regular surveys with our suppliers and request updates on their environmental practices annually. The results of these surveys are considered while deciding whether to support or continue with the supplier.

ADB SAFEGATE typically performs a full extended audit at the supplier's premises, 30 audits a year, on average which focus on all aspects of the supplier conduct guidelines and thus in large part on the environmental aspects.

## 6.3 RESPONSIBILITY AND INTEGRITY IN BUSINESS CONDUCT

In addition to previous, ADB SAFEGATE complies with all key technical local and global standards wherever applicable.

### AIRFIELD

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- International Civil Aviation Organization (ICAO) with its Design Manuals and Annex 14-Aerodromes European Aviation Safety Agency (EASA) with its Specifications and Guidance Material for Aerodromes Design
- International Electrotechnical Commission (IEC) ) IEC61827 standards in application for airfield lighting
- Federal Aviation Administration (FAA) with its Advisory Circulars and Engineering Briefs
- European Committee for Electrotechnical Standardization (CENELEC) with AGL Part 1&2

Beside these international standards, many national standards exist which are partially based on ICAO and FAA requirements with some local requirements:

- National Civil Aviation Standards: STAC/ France, CAP 168/UK, MOS 132/Australia, TP312/Canada and other

### APRON

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- International Civil Aviation Organization (ICAO) with its Design Manuals & Annex 14 Aerodromes
- European Aviation Safety Agency (EASA) with its Specifications & Guidance Material for Aerodromes Design

### TOWER

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- EuroCae standards ED (ED-85, ED-87, ED-128, ED-117, ED-109A)
- Euro Control specification for A-SMGCS & Asterix Data format specifications
- International Civil Aviation Organization (ICAO) A-SMGCS Manual (Doc 9830) & Doc 4444 European Telecommunications Standards Institute (ETSI): Community Specifications EN 303 213 all Parts and Sub-parts
- European Commission Regulation EC 552/2004 and amendments
- Single European Sky ATM Research (SESAR) and Pilot Common Project (PCP): European Commission EC 716/2014

### SERVICES

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- On the Airfield, the main regulations in application are from ICAO Annex 14 Aerodromes and the Design Manual Part 9 Airport Maintenance Practices

### MANAGEMENT SYSTEMS

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- ISO 9001:2015 standard for quality management
- ISO 14001 standard for environmental management system
- For IT security, ADB SAFEGATE is working towards an ISO 27001 certification. This has already been implemented in Graz, Austria
- ISO 45001 standard for occupational health and safety management



## 7.0 COOPERATION WITH OTHER STAKEHOLDERS

ADB SAFEGATE collaborates with institutions and communities where we are present, and where our employees live. In 2023, at least 36 students from various institutions participated in placement and research programs with ADB SAFEGATE. Our goal is to contribute in a meaningful way and make a difference in the lives of the people and communities we engage through our initiatives.

### 7.1. MEMBERSHIP IN ASSOCIATIONS

ADB SAFEGATE is committed to cooperation and collaboration with industry bodies to protect and promote the interests of the aviation sector. We are members of several reputed organizations including ACI, CANSO and EUROCAE.

We engage with industry bodies such as SESAR, and work with our peers and partners to enable our customers, and resolve issues. ADB SAFEGATE is an active participant in SESAR workshops that facilitate open discussions between airport solutions providers and airports/ANSPs on how all the stakeholders can cooperate to realistically achieve the PCP deadlines.



## **CODE OF BUSINESS CONDUCT FOR BUSINESS PARTNERS**

This Code of Business Conduct sets the fundamentals for business behaviors required by ADB SAFEGATE for its Business Partners, such as agents, distributors, suppliers, joint venture partners, consortium partners, subcontractors, etc. This Code provides the ethical and legal framework in which we want to maintain successful activities around the world.

It contains the basic principles and rules for our conduct in relation to our external partners and the general public.

This document incorporates new legal requirements and international treaties on human rights, anti-corruption, anti-trust and sustainability intended to strengthen awareness of the law and moral standards as an integral part of our entrepreneurial actions.

They set out how we meet our ethical and legal responsibility as a company and give expression to our corporate values of being “responsible – excellent – innovative.” The key message is that ADB SAFEGATE conducts only clean business.

## **COMPLIANCE FUNCTION**

The ADB SAFEGATE Group Compliance Officer (GCO) is nominated by and reports directly to the CFO of the ADB SAFEGATE Group. To ensure the compliance function in all countries where ADB SAFEGATE operates, the GCO together with the CFO of the ADB SAFEGATE Group, nominates Regional Compliance Officers (RCOs).

The GCO is the contact person for all compliance related matter and support for Business Partners. The compliance officers ensure the application of the company's compliance policy.

### **A. BASIC BEHAVIORAL REQUIREMENTS**

#### ***A.1. Behavior which complies with law***

All business partners must obey the laws and regulations of the legal systems where they are operating. Violations of the law must be avoided under all circumstances. Regardless of the sanctions that could be imposed by law, ADB SAFEGATE reserves the right to terminate the agreement in the event of unlawful behavior of the Business Partner

#### ***A.2. Mutual respect, honesty and integrity***

We always respect the personal dignity, privacy, and personal rights of every individual from various ethnic backgrounds, cultures, religions, ages, disabilities, races, sexual identity, world view, gender and consistent with the employment laws of the numerous countries in which we work. We do not tolerate discrimination against anyone on the basis of any of these characteristics or harassment or offensive behavior, whether sexual or otherwise personal.

At ADB SAFEGATE, we uphold the highest ethical standards in our supply chain. Our suppliers must adhere to international child labor and anti-slavery laws, employing no one under 15 (or 14 in certain developing countries per ILO Convention 138). We have zero tolerance for slavery or forced labor.

By aligning with ILO standards and global regulations, we ensure our supply chain is free from child labor and slavery, reflecting our commitment to ethical practices and positive community impact.

### **A.3. Responsibility for the reputation of ADB SAFEGATE**

The reputation of ADB SAFEGATE is determined by our actions and by the way each and every one of us presents and conducts himself/herself. Illegal or inappropriate behavior on the part of a single Business Partner can cause the group considerable damage.

Every Business Partner should be concerned with maintaining and promoting the good reputation of ADB SAFEGATE in the respective country.

### **A.4. Management, responsibility and supervision in the organization of the Business Partner**

The culture of integrity, ethical conduct, compliance in every organization starts at the top. All managers must fulfill their duties of organization and supervision to comply with internal policies and applicable law within their area of responsibility that proper supervision could have prevented. They still remain responsible, even if they delegate particular tasks.

All managers bear responsibility for all employees entrusted to them. All managers must earn respect by exemplary personal behavior, performance, openness, and social competence on a daily basis. Each manager must also set clear, ambitious and realistic goals and lead by example. Managers make it clear that compliance is required under all circumstances, at all times by all means.

Managers shall also be accessible in case employees wish to raise compliance concerns, ask questions or discuss a professional or personal problem. These responsibilities of managers do not relieve employees of their own responsibilities.

## **B. TREATMENT OF OTHER BUSINESS PARTNERS AND THIRD PARTIES**

### **B.1. Fair competition and anti-trust laws**

Fair competition permits markets to develop freely. Accordingly, the principle of fairness also applies to competition for market share. Every Business Partner is obliged to abide by the rules of fair competition. Anti-trust evaluation can be difficult, particularly because the rules can differ from country to country and from case to case. In many places special anti-trust law requirements apply to large companies as for example:

- Talk to competitors about prices, output, capacities, sales, bids, profits, profit margins, costs, methods of distribution or any other parameter that determines or influences the groups competitive behavior with the aim to solicit parallel behavior from the competitor,
- Enter into an agreement with a competitor not to compete, to restrict dealings with suppliers, to submit bogus offers for bidding or to divide up customers, markets, territories or production programs, or
- Have any influence on the resale prices charged by our purchasers, or attempt to make them restrict the export or import of goods supplied.

Moreover, Business Partners may not obtain competitive intelligence by using industrial espionage, bribery, theft or electronic eavesdropping, or communicate knowingly false information about a competitor or its products or services.

### **B.2. Anti-corruption: offering and granting advantages**

We compete fairly for orders with the quality and the price of our innovative products and services, not by offering improper benefits to others. No Business Partner may directly or indirectly offer, promise, grant or authorize the giving of money or anything else of value to a government official to influence official action or obtain an improper advantage.

The same applies to a private commercial counterparty. Any offer, promise, grant or gift must comply with applicable laws and ADB SAFEGATE policies, and must not raise an appearance of bad faith or unsuitability. This means that no such offer, promise, grant or gift may be made if it could reasonably be understood as an effort to improperly influence a government official or as a bribe to a commercial counterparty to grant ADB SAFEGATE a business advantage.

In addition, Business Partners may not give money or anything of value indirectly (for example, to a consultant, agent, intermediary, or other third party), if the circumstances indicate that all or part of it may be directly or indirectly passed on to a government official to influence official action or to a private commercial counterparty in consideration for an unfair advantage in a business transaction. For that reason, employees of ADB SAFEGATE, responsible for hiring consultants, agents, partners in joint ventures or other business partners must ensure that those third parties understand and will abide by ADB SAFEGATE's anti-corruption policies.

### ***B.3. Anti-corruption: demanding and accepting advantages***

Business Partners are not permitted to use their assignment to solicit, demand, accept, obtain or be promised advantages. This does not apply to the acceptance of occasional gifts of purely symbolic value.

Meals and entertainment may be accepted if reasonable in value and consistent with local customs and practices. Any other gifts, meals or entertainment must be refused.

### ***B.4. Political contributions, charitable donations and sponsoring***

ADB SAFEGATE does not make political contributions (donations to politicians, political parties or political organizations). Donation and sponsorship will be decided at ADB SAFEGATE group level with prior review and approval on purpose and content from the Group Compliance Officer.

### ***B.5. Government procurement***

ADB SAFEGATE competes for contracts from government entities and government-owned businesses around the world. In all of ADB SAFEGATE's dealings and interactions with governments, we act in a manner that is transparent, honest and accurate, complying with all applicable laws and regulations related to government procurements, including laws prohibiting efforts to improperly influence government officials.

### ***B.6. Anti-money laundering***

It is ADB SAFEGATE's objective to conduct business with reputable customers, consultants and business partners who are involved in lawful business activities and whose funds are derived from legitimate sources. We do not facilitate money laundering. All Business Partners must abide by applicable anti-money laundering laws and ADB SAFEGATE's internal procedures. To avoid problems in this area, Business Partners must be attentive to and report suspicious behavior by their employees, customers, consultants and other third parties, directly to the Group Compliance Officer.

### ***B.7. Trade controls***

ADB SAFEGATE complies with applicable export controls and customs laws and regulations in the countries where it does business. Violations of these laws and regulations may lead to serious penalties, including fines and governmental withdrawal of simplified import and export procedures (interruption of supply chain).

Business Partners involved in the import and export of goods, services, hardware, software or technology as described above must follow applicable economic sanctions, export control and import laws and regulations and any related policies and procedures established by the business in which they work.



## C. AVOIDING CONFLICTS OF INTEREST

It is the duty of ADB SAFEGATE's Business Partners to make business decisions in the best interest of ADB SAFEGATE. Conflicts of interest arise when Business Partners engage in activities at the expense of ADB SAFEGATE 's interests.

Business Partners must inform ADB SAFEGATE of any conflict of interest they could possibly have in connection with the execution of their assignment

## D. HANDLING OF INFORMATION

### ***D.1. Records and financial integrity***

Open and effective communication requires accurate and truthful reporting. This applies equally to relationships with investors, employees, customers and business partners, as well as with the public and all governmental offices. The Business Partner acknowledges that ADB SAFEGATE is required to maintain sound processes and controls so that transactions are executed according to management's authorization.

ADB SAFEGATE must also prevent and detect unauthorized use of ADB SAFEGATE assets. Therefore, all ADB SAFEGATE employees are required to make sure that the ADB SAFEGATE books and records they create or are otherwise responsible for are:

- Complete
- Accurate
- Honestly reflect each transaction or expenditure

- Timely and in accordance with applicable accounting rules and standards, whether or not the information will be included in a public filing or provided to a government agency. Such books and records include all data, certifications and other written materials provided for financial reporting and disclosure purposes as well as materials collected for other purposes.

### ***D.2. Confidentiality***

Confidentiality must be maintained with regard to ADB SAFEGATE's internal confidential or proprietary information that has not been made known to the public. Non-public information from or concerning suppliers, customers, employees, agents, consultants and other third parties is protected in accordance with legal and contractual requirements.

Confidential or proprietary information may include, in particular:

- Details concerning a company's organization and equipment, prices, sales, profits, markets, customers and other matters of business,
- Information on manufacturing or research and development, and
- The obligation to maintain confidentiality extends beyond the termination of the relevant relationship, since the disclosure of confidential information could cause harm to ADB SAFEGATE's business, clients or customers no matter when it is disclosed.

### ***D.3. Data protection and data security***

Access to the Intranet and Internet, worldwide electronic information exchange and dialogue, and electronic business dealings are all crucial to the effectiveness of each and every one of us, and for the success of the business as a whole. However, the advantages of electronic communication are tied to risks in terms of personal privacy protection and data security.

Effective foresight with regard to these risks is an important component of information technology management, the leadership function, and also the behavior of each individual. Personal data may only be collected, processed, or used insofar as it is necessary for pre-determined, clear, and legitimate purposes. In addition, personal data must be maintained in a secure manner and appropriate precautions should be taken when transmitting it. High standards must be ensured with regard to data quality and technical protection against unauthorized access.



#### **D.4. Insider trading rules**

People who have inside information with regard to ADB SAFEGATE or another company, such as a customer, supplier or joint venture partner whose securities are admitted to trading on a stock exchange or an organized securities market, are not allowed to trade in these companies' securities or in financial instruments where the prices of which depend directly or indirectly on these companies' securities (insider securities).

### **E. ENVIRONMENT AND TECHNICAL SAFETY**

Protecting the environment and conserving natural resources are high priorities for our group. Through management leadership and employee commitment, ADB SAFEGATE strives to conduct its operations in a manner that is safe for the environment and continually improves environmental performance.

#### **Further information and contacts**

These guidelines define what "integrity" means for our business. Please refer further questions to the Group Compliance Officer via email, at: [Nancy.Vancampenhout@adbsafegate.com](mailto:Nancy.Vancampenhout@adbsafegate.com).

#### **Health and safety**

Protecting the health and safety of employees in the workplace is a high priority for ADB SAFEGATE. It is the responsibility of everyone to foster ADB SAFEGATE's efforts to conduct its operations in a safe manner. ADB SAFEGATE's corporate headquarters in Belgium has implemented a health & safety management system according to OHSAS 18001 standard.

### **F. COMPLAINTS AND COMMENTS**

Circumstances which point to a violation of the Business Conduct Guidelines are to be reported to the Group Compliance Officer or to the Group CEO/CFO. All complaints can be submitted confidentially, and all complaints will be investigated. Corrective measures will be implemented if necessary. All documentation will be kept confidential to the extent permitted by law. No reprisal of any kind against complainants will be tolerated.



# APPENDIX 1

## Conventions and recommendations of international organizations

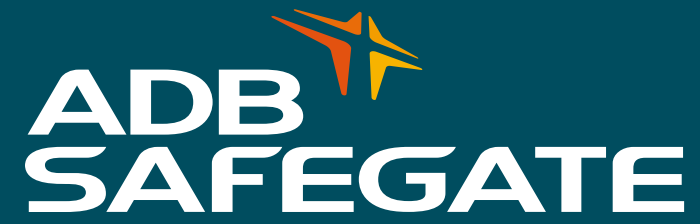
In addition to the laws and regulations of individual countries, there are a number of conventions and recommendations from international organizations which are noteworthy. Although these documents are primarily addressed to member states and not directly to companies, they nevertheless function as important guidelines for the conduct of multinational companies and their employees.

ADB SAFEGATE supports the requirements of these conventions and recommendations.

ADB SAFEGATE is also committed to embracing, supporting and enacting, within its further sphere of influence, the set of core values in the areas of human rights, labor standards, the environment, and anti-corruption included therein as an integral part of its business strategy and operations.

ADB SAFEGATE expects from its employees, suppliers and Business Partners around the globe to recognize and apply particularly the standards of the:

- Universal Declaration of Human Rights (1948) and European Convention for the Protection of Human Rights and Fundamental Freedoms (1950)
- ILO (International Labor Organization) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (1977)
- ILO Declaration on Fundamental Principles and Rights at work (1998) (especially with the following issues: elimination of child labor, abolition of forced labor, prohibition of discrimination, freedom of association and right to collective bargaining)
- OECD Guidelines for Multinational Enterprises (2000)
- “Agenda 21” on Sustainable Development (final document of
- the basic
- UN-conference on environment and development, Rio de Janeiro (1992)
- UN Convention against Corruption (2005)
- US Foreign Corrupt Practices Act
- UK Bribery Act



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