

ADB SAFEGATE

2025 ESG REPORT

A Sustainable Future for the Aviation Industry

KEY HIGHLIGHTS

- ADB SAFEGATE's ESG strategy with a focus on climate resilience, safe and supportive workplaces, and strong governance.
- Measurable progress toward reducing carbon emissions, developing inclusive corporate culture, and strengthening supply chain accountability.
- Future goals to continue integrating sustainability into every aspect of our business operations, product offerings, and stakeholder relationships.



> Sustainability is not just a business strategy; it's our collective responsibility to safeguard our planet for future generations.

Laurent Dubois
Chief Executive Officer, ADB SAFEGATE

ADB SAFEGATE is committed to creating safe, efficient, and sustainable solutions for airports worldwide.

Aware of the pressing global challenges of climate change, resource scarcity, and social equity, our mission is to help airports optimize operations, improve energy efficiency, and adopt responsible, innovative technologies while ensuring the well-being of our employees, customers, and communities. In line with this commitment, we strive to promote sustainability, foster positive social impact, and uphold the highest standards of governance by fully integrating Environmental, Social, and Governance (ESG) principles into every aspect of our operations and strategies.

Who We Are

ADB SAFEGATE provides integrated solutions to airports, airlines, and Airport Navigation Service Providers (ANSPs). We are proud to be leading the way with innovative and smart Airside 4.0® solutions that turn airports into smart airports, with the ultimate goal of increasing efficiency, safety and enhancing the passenger experience. Solutions include airfield lighting, power and control systems, airport and tower software, docking automation, apron management, and aftermarket services. Our Airside 4.0® approach leverages the Internet of Things (IoT), artificial intelligence (AI), and advanced analytics to optimize airside performance. By addressing key pain points such as operational delays, maintenance inefficiencies, and environmental impact, it is setting new standards for the future of aviation.

With over 1,400 employees and over 2,700 airports in over 175 countries, from the busiest and largest to the fastest-growing airports, ADB SAFEGATE is dedicated to making air travel safe, efficient, and environmentally friendly.

Our Legacy

- Over 10 decades of experience in aviation technology.
- Pioneered advanced lighting solutions used by airports in over 190 countries .

Geographic Presence

Headquartered in Belgium, with major regional offices across the Americas, EMEA, and APAC. These strategic locations enable us to serve diverse markets with localized expertise and support.

Our Mission:

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

Our Vision:

A future of seamless, sustainable and safe airport operations.

Core Values:

Driven by Customers, Set the bar high, Own it, Win together, Inspire talent.

Stakeholder Engagement and Materiality Assessment

ADB SAFEGATE's sustainability journey is guided by a clear understanding of our diverse stakeholders, each with specific expectations around performance, responsibility, and long-term value creation. By cultivating open communication channels and formal processes, we ensure that feedback from customers, employees, investors, communities, and regulators informs our strategic decision-making and shapes a more sustainable future for the aviation industry.

Understanding Our Stakeholders and Their Expectations

Customers (Airports, Airlines, Air Traffic Control Entities):

These partners rely on advanced, reliable solutions that improve efficiency and safety in airport operations. They seek constant innovation, seamless integration with existing infrastructure, and minimized environmental impact to align with their sustainability targets.

Employees (Engineers, Manufacturing Specialists, Sales, Support Staff, Executives):

Our workforce values a secure and inclusive work environment, fair compensation, and opportunities for professional development. They expect open dialogue on career progression and a corporate culture that upholds strong ethical and environmental standards.

Investors (Shareholders, Financial Institutions, Analysts)

Financial stakeholders need transparent reporting on how we manage risks, build resilience, and achieve steady growth. They look for assurance that our ESG commitments help safeguard assets, offer competitive returns, and highlight emerging market opportunities tied to new sustainability demands.

Communities (Local Populations near Facilities, Offices, Project Sites, and Airports)

Nearby residents to our different locations want responsible corporate behavior, including reduced noise, minimal emissions, and economic benefits through local hiring and community investment. Their expectations also encompass partnerships in educational and environmental programs that improve regional well-being. They also expect meaningful engagement on shared environmental and social concerns ranging from resource consumption to infrastructure development, along with collaboration that respects and protects local ecosystems, supports community well-being, and aligns with evolving needs of those involved in or directly affected by the aviation industry.

Regulators & Industry Bodies (Aviation Authorities, Environmental Agencies, Labor Agencies)

These entities anticipate strict compliance with safety, environmental, and labor regulations. They furthermore encourage proactive contributions to shaping industry standards—ranging from reducing carbon footprints to advancing workforce development initiatives.



Engagement Platforms

We maintain a variety of platforms to stay in tune with stakeholders' evolving needs and perspectives. Regular surveys and feedback mechanisms capture critical insights from employees, while ongoing dialogue with customers helps refine our product roadmaps. Workshops and conferences hosted regionally create spaces for deeper collaboration with industry peers, regulators, and community representatives. Meanwhile, digital channels—such as online supplier portals, investor relations platforms, and employee forums—foster swift information sharing and inclusive engagement.

Materiality Assessment

In 2024, ADB SAFEGATE introduced a formal materiality assessment process, which will be repeated periodically to identify and prioritize ESG issues that are most relevant to our business and impactful to society. This approach provides a structured framework for evaluating stakeholder feedback and analyzing how emerging trends—like energy efficiency, carbon emissions, social equity, and corporate governance—should shape our strategies. Through ongoing assessments, we ensure our ESG initiatives remain targeted, effective, and closely aligned with stakeholder expectations.

Combining continuous engagement and rigorous materiality analyses, ADB SAFEGATE aims to cultivate authentic partnerships and deliver solutions that drive innovation, uphold safety standards, and address shared environmental and social challenges within the global aviation ecosystem.

Material Topic Identification

As part of our continuous improvement in ESG management, ADB SAFEGATE currently groups its material ESG topics into three distinct tiers, reflecting their relevance to our operations and stakeholders. "High," "Medium," and "Low" labels may not fully capture the nuances of evolving sustainability challenges. Our categorization system in Tier 1, 2 and 3 concerns encompasses both immediacy and long-term impact, ensuring our efforts address the most pressing issues without overlooking emerging concerns.

In our top tier, we emphasize Carbon & Energy Management, Product Safety & Reliability, and Employee Health, Safety & Well-Being. These areas directly align with our mission to deliver climate-conscious, fail-safe, and people-centric airport solutions.

The second tier includes Diversity, Equity & Inclusion, Supply Chain Responsibility, and Data Privacy & Cybersecurity—critical operational enablers that allow us to maintain responsible hiring practices, ethical sourcing, and robust digital safeguards.

Our final category comprises Minor Facility Incidents & Non-Core Operations. While typically lower in scale or frequency, these areas nonetheless deserve needed attention to prevent small issues from escalating into larger concerns.

To determine resource allocation, we balance severity of impact, stakeholder interest, and our strategic vision. By refining our categorization method, we aim to more accurately map resource distribution, address urgent priorities, and remain nimble as new issues arise—ensuring that sustainability remains a guiding principle across all aspects of ADB SAFEGATE's operations.

ADB SAFEGATE 's ESG Commitment

Environmental Responsibility

Driving Sustainable Airport Operations

Recognizing that airports are vital nodes in the global transport network, ADB SAFEGATE invests heavily in innovations that optimize efficiency and reduce ecological impact across the entire product lifecycle. We align our activities with "Destination 2050," which provides a collective roadmap for European aviation to achieve net-zero emissions.
By focusing on the aspects most relevant to our field—airfield ground lighting, gate solutions, intelligent operational systems, and next-generation fueling infrastructure—we help airports cut energy consumption and streamline ground operations.

Resource Efficiency and Emission Reductions

Through consistent R&D efforts, we have developed leading-edge airfield lighting that operates with reduced power usage, facilitating meaningful energy and cost savings. We also deploy advanced analytics in runway management, shortening taxi times and minimizing idle engine emissions. These enhancements directly contribute to sector-wide carbon reduction goals while helping airports comply with emerging environmental regulations. In alignment with SDG 7 (Clean Energy) and SDG 13 (Climate Action), we continue to explore new materials, systems, and processes that conserve resources and halve overall emissions.

Aligned with International Frameworks

- UN SDGs – Our focus on climate action, clean energy, and resilient infrastructure ties directly into the UN's global vision for sustainable development.
- GRI – We apply the GRI standards to track our environmental performance rigorously, providing data-driven insights for continuous improvement.
- TCFD – Recognizing that climate-related risks and opportunities can shape our business strategy, we incorporate TCFD recommendations to better understand, disclose, and mitigate potential impacts on our operations.

Social Commitment

Investing in Our People

ADB SAFEGATE's workforce is our greatest asset. We champion fair labor conditions and equitable pay, cultivate a safe working environment, and actively promote training and development programs that sharpen technical skills and empower professional growth. By prioritizing SDG 8 (Decent Work) and SDG 10 (Reduced Inequalities), we foster an inclusive culture where everyone can contribute their talents to achieve our shared sustainability goals.

Diversity, Equity, and Inclusion (DEI)

We recognize that diversity in perspectives fuels innovation and drives better solutions for our customers and communities. Building a culture of inclusion, where each voice is respected, accelerates our ability to tackle industry challenges. Internally, we set measurable targets to ensure balanced representation in leadership roles and track progress through regular DEI assessments.

Community Engagement

Our social commitment extends beyond the company's walls. We support local communities through sponsorships, educational outreach, and partnerships with nonprofits that address environmental and social concerns. For example, we engage in STEM (Science, Technology, Engineering, and Math) and International Business mentorship programs, inspiring the next generation to explore sustainable aviation technologies and ethical business practices.



Governance Excellence

Ethical Standards and Compliance

Robust governance anchors all our ESG initiatives. Transparent decision-making and adherence to stringent ethical standards build stakeholder trust and align with our core values. We maintain a dedicated compliance program and code of conduct to ensure fair practices, regulatory compliance, and alignment with global norms across every facet of our operation.

Risk Management and Accountability

We actively identify, evaluate, and address risks—whether they relate to climate change, cybersecurity threats, or operational challenges—to safeguard the long-term resilience of our organization. Transparent leadership structures, clear accountability mechanisms, and ongoing stakeholder engagement form the foundation of our governance model, making it adaptable to evolving regulatory and market conditions.

Our Role in Destination 2050 and the Broader Aviation Ecosystem

ADB SAFEGATE's sustainability strategy dovetails with the key actions outlined in Destination 2050, specifically those related to improved air traffic efficiency, responsible use of sustainable aviation fuels, and the development of eco-friendly airport infrastructures. By delivering cutting-edge products and services, we equip airports and airlines to reduce operational inefficiencies and carbon emissions, ultimately driving the industry closer to net-zero targets.

In particular, we:

- Design energy-efficient lighting systems with lower power consumption.
- Improve gate and turnaround processes to reduce fuel burn and waiting times.
- Provide scalable solutions to accommodate advancing SAF technologies and, in the future, hydrogen-powered or hybrid-electric aircraft.
- Collaborate with policymakers and industry experts to highlight economic measures needed to incentivize rapid innovation and accelerate low-carbon airport transformations.

The Business Rationale

Accelerating our sustainability strategy is not just about safeguarding the planet—it also creates clear, long-term business value. By investing in green technologies and resilient infrastructures, we:

- **Build Resilience** – We fortify our operations against climate risks and regulatory challenges, future-proofing our services and products.
- **Enhance Stakeholder Trust** – Maintaining high ESG standards fosters confidence among customers, employees, investors, and the broader public, leading to more robust partnerships and brand loyalty.
- **Drive Innovation** – The need for cleaner, safer airport technologies spurs us to push boundaries, delivering advanced solutions that sharpen our competitive edge and capture new market opportunities

ESG Framework and Policies

Taken together, these systems, policies, and practices form a cohesive ESG Framework that drives us toward measurable and meaningful progress—balancing operational performance with sustainability leadership and accountability.

Certified Management Systems

ADB SAFEGATE maintains several internationally recognized management systems to drive excellence in our processes and outcomes. Through our Health, Safety, and Environmental Management Systems (HSEMS) that comply with ISO 14001 and ISO 45001, we adopt a life-cycle perspective on ecological impacts and safeguard employee health and safety. Adherence to our Quality Management System (QMS) under ISO 9001 guarantees product consistency and customer satisfaction, while ISO 27001-certified IT Security Management Systems protect our critical data and infrastructure. Additionally, our use of the Climate Activator system underlines our pledge to track and reduce greenhouse gas emissions, driving continuous environmental improvements.

Key Policies

To operationalize our ESG commitments, we have adopted a suite of policies that define our workplace culture and stakeholder interactions. Our ESG and QHSE (Quality, Health, Safety, and Environment) policies guide decision-making and performance metrics across the company. Our Climate Policy focuses on systematic carbon footprint management in line with global climate goals. We ensure an inclusive work environment through Diversity, Equity, and Inclusion (DEI) and Pay Equity policies that encourage fairness and accountability. Sustainable Procurement commitments promote responsible sourcing, while our Protection of Whistleblowers policy reinforces transparency and ethical conduct. Finally, zero-tolerance Workplace Violence and Human Rights policies, along with Anti-Bribery & Corruption measures, define our stance on safeguarding individual dignity and integrity

Environmental Practices

Our environmental practices target tangible outcomes in energy efficiency, carbon emissions reductions, and resource stewardship. By emphasizing energy management and cutting greenhouse gases, we align our operational goals with global climate priorities. Embracing a circular economy model guides us to minimize raw material use, pursue mandatory waste-reduction strategies, and conserve water through effective management systems. We further solidify our responsible consumption approach by prioritizing recycling and safe disposal methods for all waste streams, reflecting our commitment to protecting communities and ecosystems

Demonstrated Commitment to Address ESG Topics

Societal Context

- European Union is striving for climate neutrality by 2025
- ACI's Net Zero by 2025 pledge influence ADB SAFEGATE strategy and trajectory

Regulatory Context

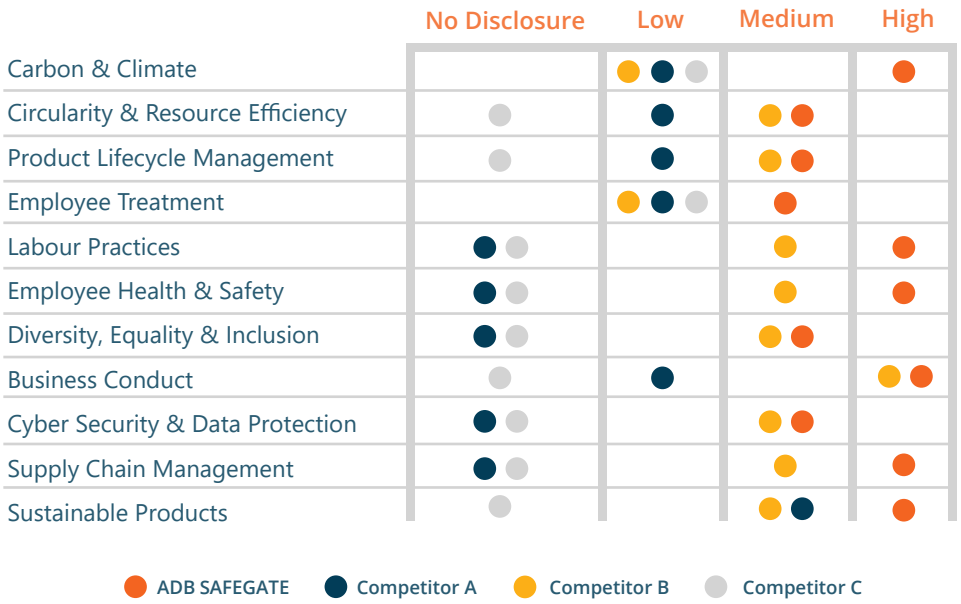
- Operations across various regions and regulations, driving product development
- New Inset product range complies with all regulations
- Periodic ABC training for employees facing corruption risks (i.e. sales)

Customer Expectation

- Customer awareness requires sustainability information through procurement processes
- ESG criteria are customers' decision drivers

> "We are committed to promoting the green transition in airport operations, addressing our environmental responsibilities through various initiatives and actions that demonstrate our commitment to sustainability.
>
> – Laurent Dubois, CEO, ADB SAFEGATE

ADB SAFEGATE's ESG Prioritization vs Peers



Creation of an ESG Committee

Laurent Dubois
Group CEO

Dominic Côté-Vaillancourt
Group CFO

Alex Robles
Customer Care & Service Support Manager

Nancy Van Campenhout
Legal Counsel & Group Compliance Officer

Martin Lopez Meijide
Head of Pricing Excellence & Transformation Manager

New ESG audits programme for main suppliers



- Publication of a yearly CSR report since 2021
- Certified Carbon Neutral from 2024
- Committed to reduce carbon footprint by 40% by 2030

ESG Maturity

ESG Maturity 2022	ESG Maturity 2023	ESG Maturity 2024
Proactive	Proactive	Strategic

Core Indicators

ESG Management

Oversight	Yes
Strategy	Yes
Reporting	Yes

Sub-Indicators

Report aligned with framework

Yes

GRI

Core Indicators

GHG Emissions

GHG footprint	Yes

Sub-Indicators

Company has set Paris Aligned Target

Yes

Core Indicators

Board Oversight

ESG Accountability at Board Level	Yes

Core Indicators

Employee engagement

Employee survey	Yes

Sub-Indicators

Employee survey response rate

73%

ESG Maturity is assessed on the following scale:

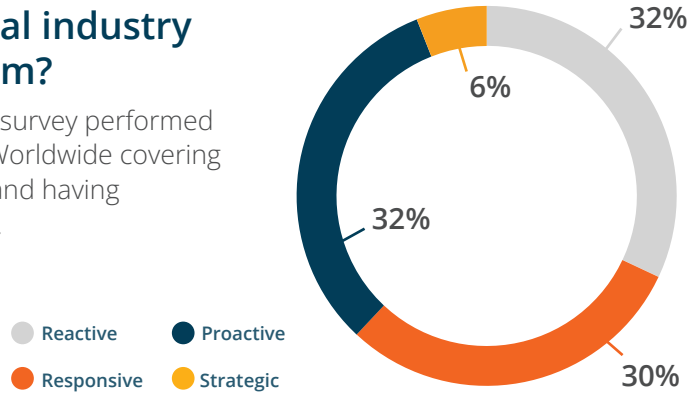
reactive - responsive - proactive - strategic

The level is determined by how many of the six core indicators and three sub-indicators your company has in place. The more you have, the higher up the maturity scale you'll be. These are:

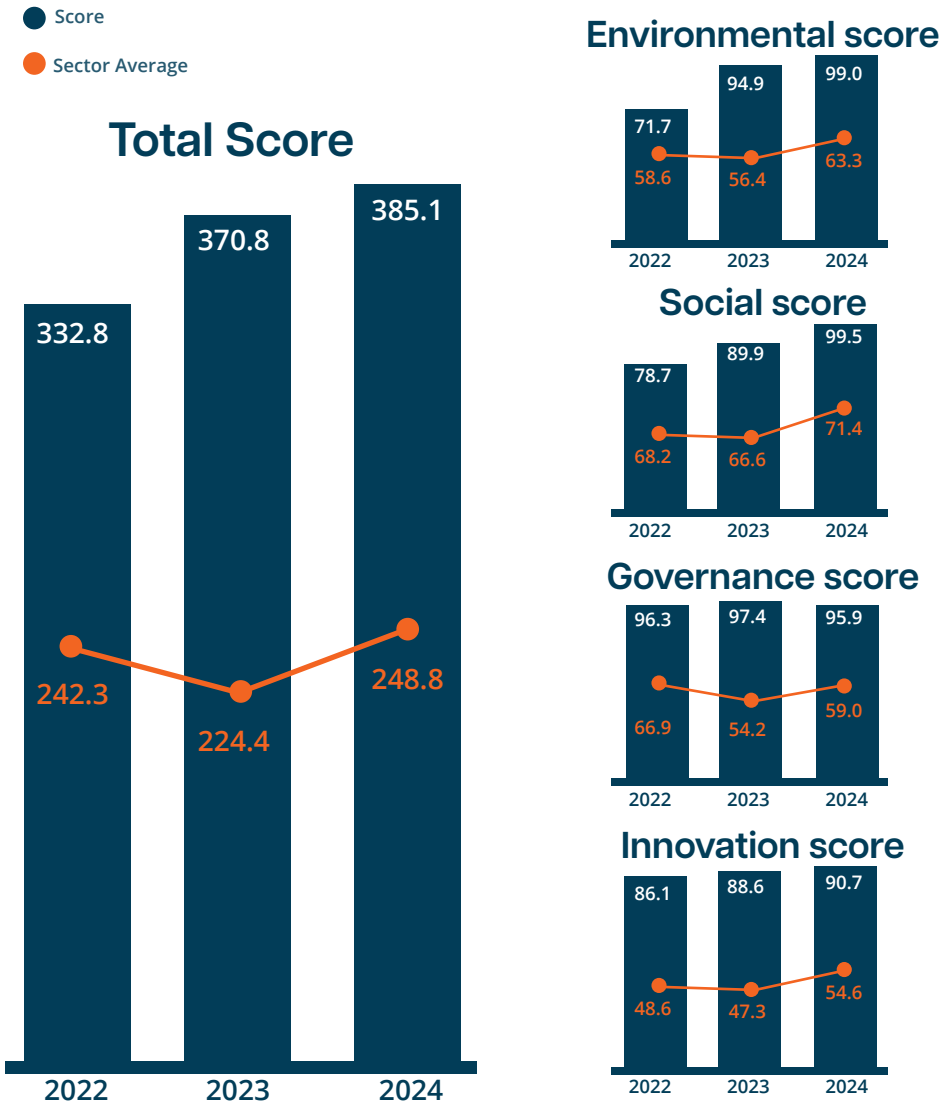
Oversight – internal resource responsible for ESG (full or part time).
Strategy – formalised ESG strategy in place including KPIs.
Reporting – publicly available ESG/Sustainability report.
Sub-Indicator: Report aligned to framework – such as GRI or SASB.
GHG Footprint – carbon or GHG footprint for the business.
Sub-Indicator: Paris-aligned Target – decarbonization target aligned with science- based trajectories.
ESG Accountability at Board Level – board member with responsibility for ESG oversight.
Employee Survey – conducted on an annual basis.
Sub-Indicator: Survey Response Rate – greater than 75% of employees.

How does the global industry (in average) perform?

Note: Results based on a a survey performed involving 1200 companies Worldwide covering different types of activities and having participated to the exercise.



Diagnostic Results



Revenue generated by

1,535 employees

Sustainability-linked revenue

95%
Revenue from
ESG products/services

95%
Revenue predicted for
new ESG products / services

Yes
Products / services
with ESG benefits

Yes
ESG products / services
launching in 2 years

Yes
Monetisation of
waste stream

Notes: Sector average = average score for companies belonging to ADB SAFEGATE's sector participating to the. survey

Our Performance On Key ESG

Environment, Social and Governance Indicators

	Key performance indicator	Aspirations	Results (2024)	Status	Impact	Explanation
Compliance	No. of legal and regulatory fines and settlements associated with incidents of: • Environmental non-compliance • Corruption or bribery • Labor law violations	Zero	90% 65%	On track	Values Alignment, Reputational and Financial Risks, Culture of Accountability.	By remaining vigilant and compliant in everything we do, we mark another year (FY24) with zero reported ESG-related issues.
Energy Management	Total energy consumed % from renewable sources	Improve	FY24 (total energy consumption in kWh) = 8657 kWh of which 37.5% is renewable assimilated in this case to renewable source.	On track	Carbon Footprint Reduction, Operational Efficiency and Cost Savings, Positive Stakeholder Perception.	Our data collection spans all main factories, offices, project, and service sites. In 2022, 27% of the energy reported under Scope 1 and 2 was from renewable sources; despite increased group activity, that figure rose to 33% in 2023 through rigorous energy management, efficiency investments, and certified green electricity purchases—culminating in a further improvement to 37.5% renewables in 2024.
Energy Management	Employee turnover • Voluntary and • Involuntary	<2% hazardous waste, 100% recycled. Non- hazardous waste (wood, metal & cardboard/ paper) 100% recycled	3.5 tons hazardous waste produced. 98% recycled Non-hazardous waste: 138.3 tons generated. –down by 32.7 tons vs. 2023, 67% recycled.	On track	Environmental Impact Minimization, Cost Efficiency and Resource Management, Regulatory and Reputational Compliance.	Despite a significant increase in turnover, ADB SAFEGATE's non-hazardous waste decreased by 19%, while hazardous waste remained stable with a slight drop of 0.15 tons compared to 2023. It will be extremely challenging to eliminate hazardous waste entirely, given that certain packaging materials are considered hazardous and that epoxy resins, solvents, and paints remain integral to our industry. These outcomes are largely attributed to focused R&D, strategic investments in production efficiency, and a steadfast commitment to sustainable practices. Each project and product milestone further underscores our dedication to minimizing environmental impact across our operations.

	Key performance indicator	Aspirations	Results (2024)	Status	Impact	Explanation
Packaging	% of packaging that is recyclable	65%	90%	On track	Carbon Footprint Reduction, Resource Efficiency and Environmental Stewardship Brand Reputation and Stakeholders Confidence.	Whenever feasible, we choose packaging from responsibly sourced and recycled materials, reflecting our unwavering commitment to the environment. Although specialized electronic components and protective plastic films require new materials, the majority of our AGL and Apron solutions are packed in cardboard or wood. In certain parts of the world, however, verifying the recycled content of packaging remains a challenge, slowing our ability to fully achieve this KPI. Still, we continue working closely with our supply chain partners to broaden the availability of recycled packaging options on a global scale.
	% packaging made from recycled materials	50% for AGL and Gate Products	65% In some countries in the World it is complicated to have the warranty that packing data is from recycled source or not.	On track		
Worker safety	Occupational accident frequency rate with lost time • FTEs • Contract employees	0	3 accidents recorded in 2024 for 1535 employees (FTE) LTIFR: 0.98	Ongoing	Improvement Employee Engagement, Healthy Workforce Focus, Reduced Insurance Costs, Brand integrity.	At ADB SAFEGATE, maintaining a safe workplace is paramount, and our Global QHSE and Sustainability Framework—launched in 2021—continues to deliver outstanding outcomes for the fourth consecutive year. Company While we experienced zero serious accidents, three minor injuries must be reported. The result emphasize our commitment to ongoing training and policy enhancements. We remain dedicated to safeguarding our workforce by continually refining our safety measures, promoting employee awareness, and investing in robust QHSE initiatives.
	No. of major accidents: • FTEs • Contract employees	0	0 OSHA recordable incidents - contract employees not included	Ongoing		
Labor & working conditions	Employee turnover • Voluntary and • Involuntary	Employee turnover target is 9%	10.84%	To be improved	Talent Retention and Development, Healthy workforce, Operational efficiency by reduced recruiting and training costs,	Our concerted efforts to enhance engagement and retention are already yielding tangible results, evidenced by a drop in turnover from 14% in 2023 to 10.84% in 2024. While we celebrate this significant progress, we remain committed to refining our initiatives and continuing to improve the overall employee experience.

	Key performance indicator	Aspirations	Results (2024)	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	Enhanced Governance, Stakeholder Trust, Culture of Integrity.	Since 2018, we have embedded anti-bribery and corruption training into our executive onboarding and hold regular refresher sessions to uphold high ethical standards throughout the organization. As of 2024, every employee now participates in quarterly ESG training, further embedding robust compliance measures and a transparent culture across all levels of our operations.
Supply Chain Quality Management	Number of key suppliers subject to EHSS audit	45 per year	85 audits were performed on a global level	On track	Increased transparency, Brand integrity, Supply Chain Accountability, Risk Management and Resilience.	In 2023, we introduced a new EHSS audit program for our main suppliers. One year later, we raised our audit goal by 26%—from 33 to 45 audits—yet ultimately performed a total of 85 EHSS supplier audits, far exceeding our initial aspiration. This significant progress reinforces our broader ESG commitments and complements our existing policies and Code of Conduct.
Product sustainability	Percentage of revenues linked to Sustainability	85%	95%	On track	Boosting Innovation and Market Differentiation Carbon Footprint Reduction, Resource Efficiency and Long-Term Resilience Brand Reputation and Stakeholders Confidence.	ADB SAFEGATE achieved 95% of its revenues from sustainability-driven solutions—10 points above the initial target. This milestone reflects the company's commitment to advancing sustainable innovation and delivering measurable environmental, social, and governance value.

Decarbonization

Baseline

Baseline carbon footprint to improve performance on carbon and energy over time

GHG footprint	Yes
Third-party assurance for GHG footprint	Yes

Targets

Demonstrates commitment to carbon reduction, and sets pathway to improve performance over time

Paris-aligned* emissions reduction target	Yes
Decarbonisation actions	Yes
Renewable energy consumption	Yes

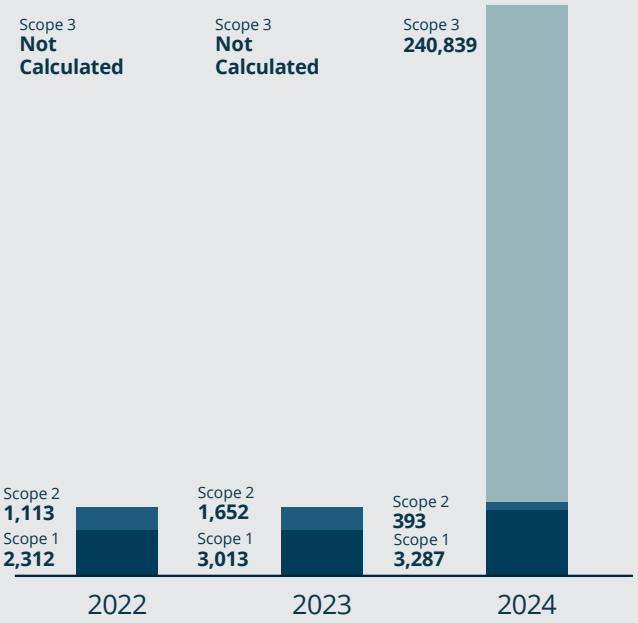
Reporting

Generates a visible commitment to performance improvement on carbon emissions reduction

Public reporting on GHG progress	Yes
TCFD-aligned reporting	No
Climate risk assessment	No

** Paris-aligned targets are goals that seek to limit rise in global temperatures to well below 2°C above pre-industrial levels, and to pursue efforts to keep the rise to 1.5°C.*

GHG Emissions[1]



Scope 1 emissions—direct emissions from sources that are controlled or owned by the company (i.e. on-site fossil fuel combustion and fleet fuel consumption).

Scope 2 emissions—indirect emissions from sources that are owned or controlled by the company (i.e. emissions that result from the generation of electricity, heat or steam purchased by the company from a utility provider).

Scope 3 emissions—all other indirect emissions associated with the company's value and supply chains, including business travel. Scope 3 emissions on the above graph are not shown to scale.

Sustainability: A Must!

Airports Under Increasing Pressure to Invest into Emission-Saving Initiatives

Regulatory push

Airport Climate Challenge to help achieve the net-zero emissions by 2050 European Green Deal sets out the need to reduce transport emissions by 90% by 2050 (vs. 1990 emissions)
Net zero flying by 2050 set out in the Jet Zero Strategy, published by the UK Government in 2022

Airport Net Zero Goals

Top airports in the world in 2025 all have sustainability at the core of their strategy or mission statement, including carbon neutral operations in 2030 (e.g., Munich Airport plans to reach net zero in 2035)

> “Aviation is in the spotlight for its impact on climate change, and so we need to work very hard on this issue

Olivier Jankovec,
ACI Europe’s Director General Climate Action Hub at COP26 2021



Commitment to a Sustainable Future

> ADB SAFEGATE is dedicated to advancing sustainability across all aspects of our business, contributing to a more sustainable future for the aviation industry. Our comprehensive approach, from energy-efficient products to innovative solutions and stringent policies, demonstrates our commitment to environmental stewardship and industry leadership.

Dominic Côté-Vaillancourt,
Group CFO

Climate Adaptation and Transparency

Adaptation Measures

Incorporating practices to enhance resilience against climate impacts, ensuring operations and infrastructure can withstand changing conditions.

Transparency

Adhering to mandatory reporting requirements, providing regular updates on climate policy progress and emissions data.

Emissions Standards

Complying with regulations mandating emissions standards for vehicles and promoting low-emission transportation options, including electric vehicles.

Driving Sustainable Aviation Innovation

Eco-Friendly Solutions

Energy-efficient products, innovative technologies

Industry Leadership

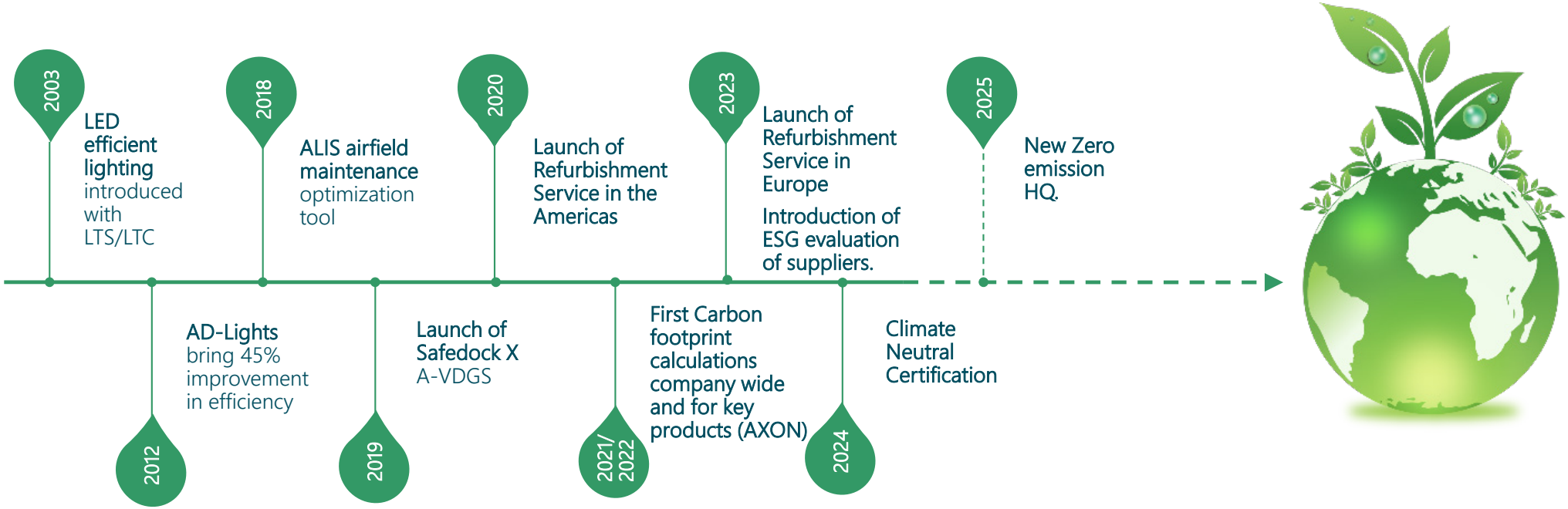
Setting new standards, inspiring a movement.

Commitment to Sustainability

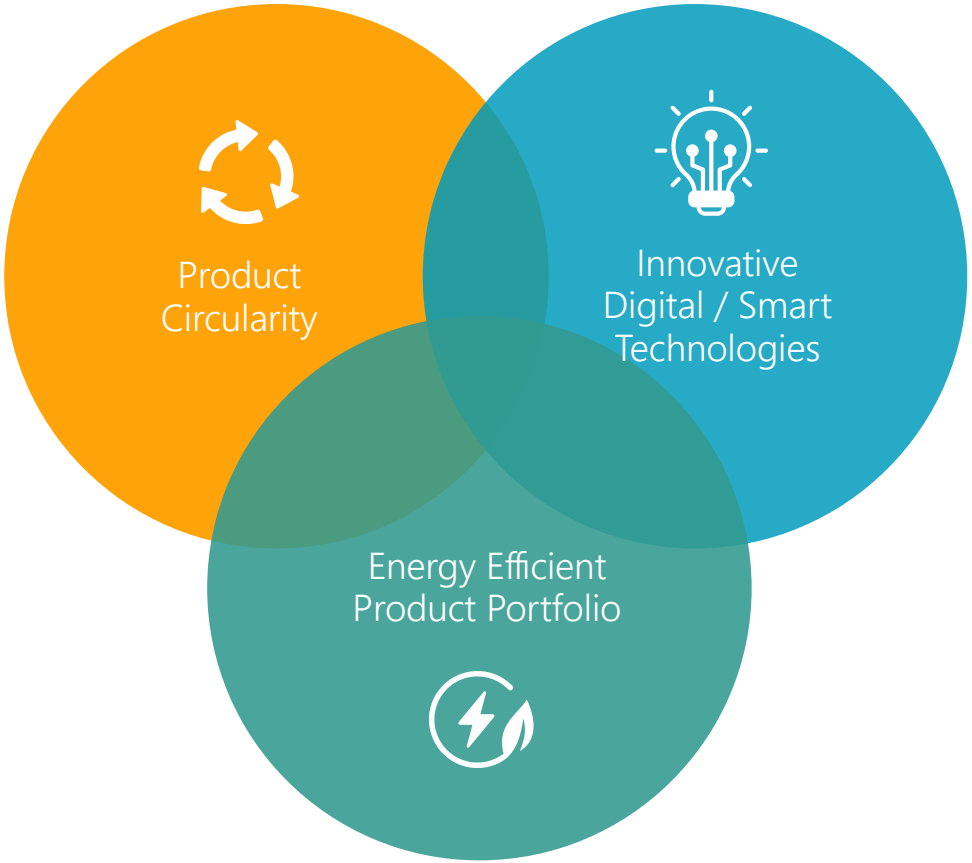
Stringent policies, comprehensive approach encompassing all our activities.



Specific innovations to improve sustainability and circular economy taken since 20+ years... and accelerating



Sustainability at the Core of Recent Initiatives



Energy Efficient Product Portfolio

- Use of smart LED technology since 2003 allowing up to 80% in energy savings vs halogen bulbs
- Phasing out halogen bulbs from products achieved in February 2024
- Integration of carbon footprint calculation in Product Line Management Processes in 2022with a target 80% coverage of 400+ products by 2030

Innovative Digital / Smart Technologies

- Development of Airside 4.0®, an integrated airside IoT ecosystem, supporting sustainability commitments through more efficient use of resources and better airports services
- Leverage of intelligent Individual Lighting Control & Monitoring Systems (ILCMS) and guidance systems to reduce aircrafts' taxi time, and therefore fuel consumption and emissions

Product Circularity

- Rationalization of airfield product portfolio from 372 to 219 products between 2021 and 2024, consolidating 385 suppliers and 1,500+ components, making them easier to replace, maintain, and refurbish, increasing operational lifetime
- Refurbishment business fully operational in Americas and under acceleration in Europe

Certified Climate Neutral since 2024

OUR APPROACH:
FROM A TO ZERO CO_2 IN 4 STEPS

1



FOOTPRINT
Calculate the carbon footprint

2



REDUCTION
Reduce the carbon footprint as much as possible

3



COMPENSATION
Neutralise the remaining emissions via offsetting

4



CERTIFICATION
Endorse the climate neutral claim by external verification

The CNG Climate Neutral Certification Program offers companies Climate Neutrality* with a pathway of internal GHG emission reductions in line with the Paris Agreement.

We commit to reduce our carbon footprint (scope 1& 2) by 40% by 2030, while compensating our carbon emissions in the meantime by investing in verified emission reduction projects (offsetting) and reach 100% reduction by 2050 (sc1 & sc2)**.

Annual 3rd party audit/verification allows to transparently vouch for our efforts.

Carbon Neutrality means no carbon emissions impact from our direct and indirect operations (Scopes 1 & 2, and partial Scope 3 of the Greenhouse Gas Protocol or GHG) by carbon emissions reduction and compensation.

**Reduction from 2023 Baseline of GHG Scope 1, Scope 2 and Scope 3 Categories 6 and 7.



We are Climate Neutral Certified since the 15th of November 2024, being able to use this claim during all 2025

ADB SAFEGATE Decarbonization Strategy

Our Climate Ambitions

To achieve our GHG reduction targets, we will implement the following reduction measures:

(extract from Reduction Plan, 2024)



Description of reduction measure	Envisioned CO2 reduction	Envisioned year of implementation	Status (planned or committed)
Guarantees of Origin (green electricity)	1620.6 tCO2e	2024	Committed
Electric cars (Belgium)	159.6 tCO2e	2024	Committed (partially)
Heat pumps	400.4 tCO2e	2025	Planned (partially)
Regular tyre check-up	11.7 tCO2e	2025	Planned
Flight policy	5.9 tCO2e	2025	Planned
Connect to Grid in Doha	126.1 tCO2e	2027	Planned
Buying SAF certificates	486.6 tCO2e	2029	Planned

The Most Sustainable Portfolio in Aviation Solutions

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.



Key Milestones

Carbon product footprint initiatives:

Our AXON Inset and Elevated Lights, alongside CRE regulators, have undergone an evaluation of their entire product lifecycle emissions.

Airport Tech Awards:

Recognizing our commitment to sustainability through innovative airport technology solutions. ADB SAFEGATE honored with the Environmental Award for its SAFEDOCK Advanced Visual Docking Guidance System (A-VDGS). In a test case, this system reduced airport CO2 emissions by 2,389 tons and lowered fuel consumption by 756 tons.



Historic Win at Hong Kong Super Terminal Expo:

ADB SAFEGATE Asia awarded the Best Sustainable Initiative in Technology Category, showcasing our leadership in sustainable aviation technologies.

Innovative Solutions

Innovative Solutions

Airside 4.0®

Integrates IoT devices for enhanced decision-making, reducing aircraft movements and fuel consumption.

~40% estimated reduction on energy consumption driven by Airside 4.0® vs. LED lights

Intelligent ILCMS

Individual Lighting Control & Monitoring Systems decrease taxi times and fuel consumption, contributing to lower emissions.

ABU DHABI AIRPORTS
Installation of Follow-the-Green system between runway and gates

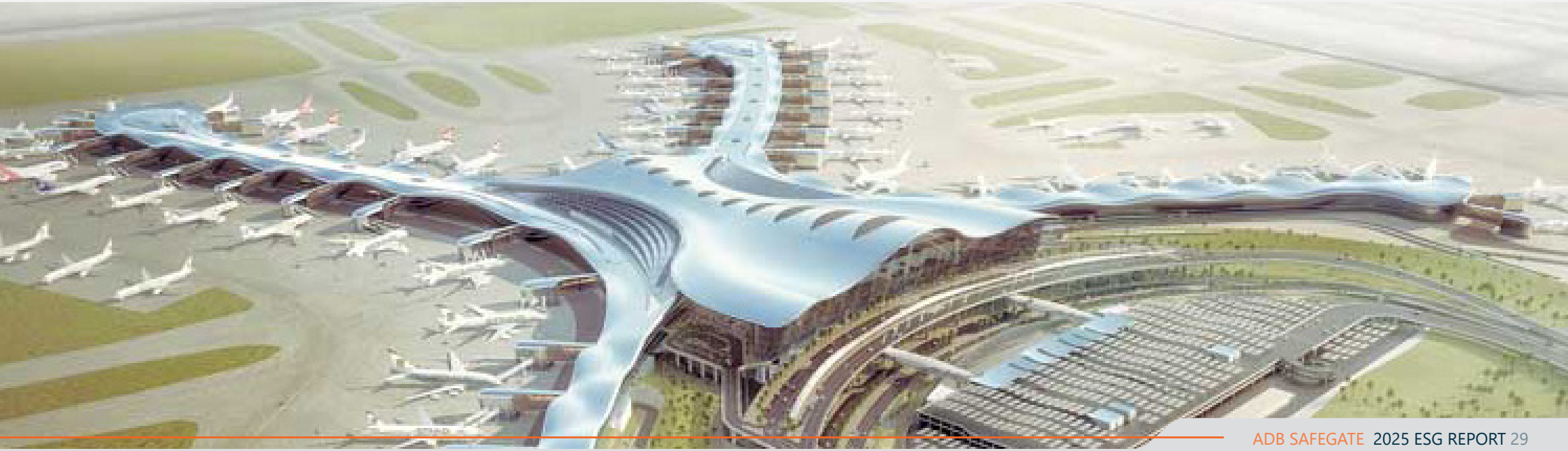
25% reduction in electricity usage for airfield lights

Refurbishment Program

Launched in 2023, allowing product refurbishment and return to customers, significantly reducing carbon emissions compared to new production.

SCHIPOL
Large scale refurbishment pilot program of AGL, including extensive quality testing

Refurbishment of lights shows overall CO2 emissions saving of +80% vs. new lights



Scope 3 Emissions

Follow the Greens Benefits



Increase
SAFETY
4 route deviations in pre-SESAR, none with AGL



Reduce
EMISSIONS
> 40% reduction of CO2, HCs, NOx, almost 50% reduction of CO



Reduce
FUEL BURN
up to > 30% less fuel used, depending on environmental condition



Improve
AIRPORT TAXI PERFORMANCE
e.g. no loss of performance in low-visibility at night



Increase
TRAFFIC FLUENCY
>80% less stops in low-vis
~50% reduction in CAVOK



Reduce
TAXI TIMES
>30% reduction in low-vis
>10% reduction in CAVOK



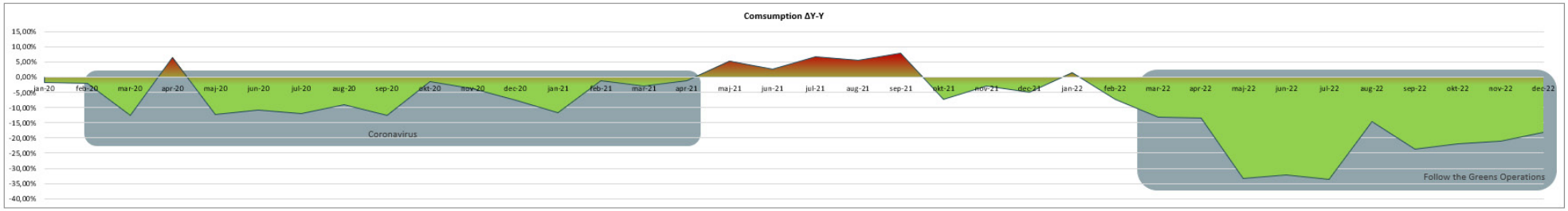
Reduce
MOVEMENT DELAY
~50% reduction of time between taxi request and initial movement

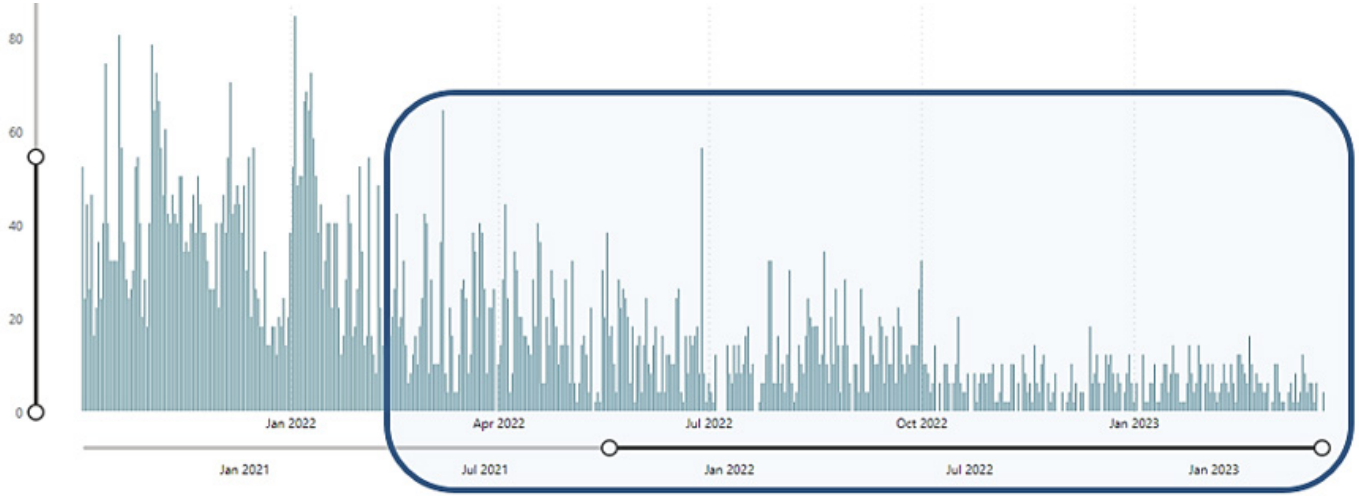
Source: SESAR P06.07.03 AGL Guidance Validation, Frankfurt

Scope 3 Emissions

Reference - Abu Dhabi Int. Ap – A-SMGCS

Energy Savings





Decreasing Taxi Times

First large-scale refurbishment with Amsterdam Airport Schiphol

Large scale refurbishment pilot program of AGL, including extensive quality testing

Refurbishment of lights shows overall CO2 emissions saving of +80% vs. new lights

Kaagbaan Refurbishment Project:

- 74 tonnes CO2e Saved (ISO14044)
- Over 1000 inset & elevated fixtures
- 150 kg of electronics and metals recycled
- Reused carbon-intense aluminum and converter
- Replaced Optical Components for like-new performance
- Carbon Savings Letter issued at the end



Social Responsibility

Human-Centered Approach

Our social responsibility is grounded in the recognition that our employees, suppliers, local communities, and customers are key partners in advancing our mission. We strive to create a safe, inclusive environment that fosters personal growth, community empowerment, and stakeholder trust.

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 have more than 1,400 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 on core business lines to pursue and enable innovation.

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.



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

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 is 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. Since 2022 we also execute an annual all-employee pulse survey, achieving consistent employee participation of over 73% in 2024. Over 84% of employees have indicated happiness at work, alongside a positive Net Promoter Score during the same period.

In addition to these initiatives, we have introduced a global recognition program in 2024 called the Adrien Awards, named after our founder Adrien De Backer, a leader whose innovative mindset and vision established our foundation. This program was developed based on survey feedback to celebrate exceptional talent and the display of our values across the organization. The Adrien Awards aim to bring better visibility and recognition to the outstanding contributions of our ADB SAFEGATE employees, reinforcing our commitment to fostering a culture of appreciation and excellence.



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.

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 10.4% of Fortune 500 CEOS are women, the number is much lower for aviation at 6%. 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.

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.



Governance

Responsibility and Integrity in Business Conduct

ISO 9001 global multisite certified company with, ISO 14001, 45001 & 27001 with certified offices in Zaventem, Malmö, Graz and Manchester.

- Compliance with the laws and regulations of every country in which we operate
- Executives attend at least one ethics training session bi-annually
- Compliance Review Committee
- Anti-corruption policy
- Export control policy

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.

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.

Responsibility and Integrity in Business Conduct

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

AIRFIELD

- 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

- 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

- 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

- 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

- 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
- Climate Activator Standard for climate neutrality management.

Cooperation With Other Stakeholders

ADB SAFEGATE collaborates with institutions and communities where we are present, and where our employees live. In 2024, at least 72 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.

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.



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.

Basic Behavioral Requirements

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

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.

Responsibility for ADB SAFEGATE's Reputation

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.

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.

Treatment of Other Business Partners and Third Parties

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.

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.

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.

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.

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.

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.

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.

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

Handling Of Information

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.

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.

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.

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).

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.

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 ISO 45001 standard.

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.



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.

Appendix

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 ofthe 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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