



Third Party Due Diligence Policy Statement

PURPOSE

At AD Ports Group, we recognise the importance of maintaining the highest ethical, legal, and professional standards in our operations and partnerships. This policy statement outlines our commitment to conducting thorough due diligence on counterparties to ensure compliance with applicable laws, mitigate risks, and promote responsible business practices in accordance with the group's policies, governance, risk and compliance (GRC) frameworks, business partner code of conduct, applicable laws, regulations, standards, and recommendations.

SCOPE

The statement supports AD Ports Group's relevant policies which apply to all external parties engaging with AD Ports Group, including suppliers, contractors, consultants, agents, and any other entities providing goods or services or representing the Group in any capacity. It covers all interactions, from initial onboarding to ongoing engagements, regardless of geographical location or scope of work.

POLICY STATEMENT

AD Ports Group is committed to fostering transparent, ethical, and sustainable partnerships.

To achieve this:

- **Due diligence process:** We conduct a structured, risk-based due diligence process to evaluate the legal, financial, and reputational standing of all Counterparties prior to engagement. This includes assessing legal status, compliance with Anti-Bribery and Anti-Corruption, Anti-Money Laundering (AML), Sanctions, and applicable international trade laws.
- **Risk management:** All Counterparties are classified based on a risk-based approach, ensuring appropriate evaluation and monitoring. Enhanced Due Diligence is applied to high-risk entities and individuals.
- **Legal compliance:** All Counterparties must adhere to applicable national and international laws, as well as AD Ports Group's policies.
- **Sustainability commitment:** All Counterparties are expected to align with the Group's Environmental, Social, and Governance (ESG) objectives. This includes but is not limited to respecting human rights, adhering to ethical labor practices, and minimising environmental impact.
- **Ongoing monitoring:** We reserve the right to periodically review counterparties' compliance and performance. Non-compliance or unethical behavior may result in termination of the relationship and/or legal actions.

Through this, AD Ports Group reinforces its dedication to creating value-driven partnerships while upholding the highest standards of integrity and sustainability.

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