



Corporate Social Responsibility Report

2023

ADB 
SAFEGATE

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About this Report

This is the 2023 report on Corporate Social Responsibility of the ADB SAFEGATE Group.

THE SCOPE OF THIS REPORT

This report covers operations and activities of the ADB SAFEGATE Group, which is present in over 38 locations covering all continents. The group has seven main operational offices that include all processes from product management, research and development, sales, supply chain, production, project management, services, marketing, finance, IT, quality, environment and health & safety management. The following report provides a coverage of the full ADB SAFEGATE Group.

REPORTING FRAMEWORK AND ASSURANCES

ADB SAFEGATE aims to enhance the comprehensiveness and consistency of our corporate social responsibility report. By aligning with a selection of Global Reporting Initiative (GRI) Standards and the European Directive on non-financial and diversity disclosure, we facilitate compatibility with other organizations. While we are in the initial phase of adopting GRI Standards, we acknowledge that achieving full compliance will be an ongoing process.

AVAILABILITY OF THIS REPORT

This report was published on June 2, 2023 is available in a digital and printable format. It can be accessed online at adbsafegate.com/sustainability where the previous reports, published in 2021 and 2022, can also be accessed. Sustainability and corporate responsibility topics are also discussed in our official local reports where applicable. The Board Review of 2022 Annual Accounts includes non-financial information as required by the Belgian law implementing the EU Directive on disclosure of non-financial and diversity information.

Letter from the CEO



Laurent Dubois
Chief Executive Officer,
ADB SAFEGATE

As we reflect on the challenges faced by the world and the aviation industry in 2023, I am inspired by the unwavering commitment of ADB SAFEGATE to drive transformative change and lead the way towards a sustainable and green recovery.

Europe continues to set ambitious sustainability targets, with the European Union striving for climate neutrality by 2050. ACI Europe's commitment to facilitating net-zero carbon emissions aligns with the collaborative efforts of ACI World and the five ACI regions, demonstrating the collective determination to achieve a sustainable future. At ADB SAFEGATE, we recognize the importance of innovation, operational efficiency, and the implementation of sustainable practices in reaching these goals.

Sustainability is a vital component of our business strategy, extending beyond products and services to encompass our environmental impact, societal contributions, and corporate governance. Our CSR strategy, based on the UN Global Goals for Sustainable Development, reflects our dedication to being a responsible corporate citizen and supporting sustainable airport operations.

Our stakeholders trust us to deliver sustainable solutions, and we prioritize effective corporate responsibility management to create value for all. Our CSR strategy focuses on three main areas:

Enhancing Sustainability in Airport Operations:

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.

Fostering a Rewarding Work Experience:

Our employees are our greatest asset, and we strive to create a workplace culture that prioritizes professional development and personal well-being.

Building Impactful External Partnerships:

We recognize the value of establishing and sustaining strategic CSR partnerships to amplify the impact of our sustainability efforts in airport operations.

This message highlights our achievements in 2023 and showcases the influence of our solutions, processes, practices, and initiatives as we work together to create a sustainable future. The ongoing challenges faced by our industry only serve to strengthen our resolve and reinforce the importance of sustainability in our strategy.

This report message underlines our accomplishments in 2022 and showcases the influence of our solutions, processes, practices, and initiatives as we endeavour to create a sustainable future.

1.0. ADB SAFEGATE TODAY

Our Industry

In 2022, the airport industry recognizes that its success and resilience are closely tied to its performance in sustainability and social responsibility. Stakeholders, including investors and passengers, are increasingly considering these factors in their decision-making processes. Airports that actively integrate these principles are poised to contribute to a more sustainable and responsible aviation sector while potentially excelling in their financial performance.

This is not the only trend that has been confirmed in 2022. We may list the following important factors.

Automation and Robotics: The use of automation and robotics is increasing in airport operations, including airplane guiding and docking, baggage handling and aircraft maintenance. This is driven by the need for increased efficiency and safety, as well as the shortage of skilled labor.

Internet of Things (IoT): The IoT is playing a growing role in airport operations, with sensors and connected devices being used to monitor and control various aspects of airport operations, including parking, security, and energy management.

Digital Transformation: Airports are increasingly embracing digital transformation, including the use of cloud-based systems, big data analytics, and artificial intelligence. This is enabling airports to improve operations, enhance the passenger experience, and optimize resources.

Safety and Security: Safety and security are top priorities for airports, and new technologies are being developed to enhance safety and security, such as biometric screening and advanced threat detection systems.

Digital Transformation: Airports are increasingly embracing digital transformation, including the use of cloud-based systems, big data analytics, and artificial intelligence. This is enabling airports to improve operations, enhance the passenger experience, and optimize resources.

Safety and Security: Safety and security are top priorities for airports, and new technologies are being developed to enhance safety and security, such as biometric screening and advanced threat detection systems.

Enhanced Environmental Considerations:** As the European Union targets carbon neutrality by 2050, airports and aviation must adopt eco-friendly strategies. Efforts include minimizing energy consumption, extending equipment lifespan, and optimizing aircraft turnaround times to reduce emissions.

Unified System Operations: by integrating various systems, airport operations can become more efficient, streamlined, and easier to manage.

Strict Regulatory Adherence:** Airport technology must meet all specifications and requirements pertaining to quality, health, safety, and environmental management systems in order to receive necessary certifications.

Safety as a Top Concern:** Airport technology investments prioritize safety compliance and conformance to the most stringent regulations.

Favoring Local and Regional Alternatives:** Airports are exploring cost-effective, local and regional solutions while considering CAPEX, OPEX, and pricing factors.

Tailored Design Innovations for Improved Efficiency:** Customized solutions are replacing one-size-fits-all approaches, as airports address unique challenges in a world impacted by COVID-19 related unpredictability and fluctuating demand.

Embracing Automation:** Airports are leveraging automation technology to achieve a stable resource base, while simultaneously bolstering efficiency, safety, and sustainability.

Commitment to Routine and Essential Maintenance:** Airports are focusing on regular, non-discretionary maintenance spending to uphold operational levels and manage costs effectively.

Our Performance On Key ESG


Environment, Social and Governance Indicators

MATERIAL ESG ISSUES

	Key performance indicator	Aspirations	Results (2022)	Status	Impact	Explanation
Compliance	No. of legal and regulatory fines and settlements associated with incidents of: <ul style="list-style-type: none"> • Environmental non-compliance • Corruption or bribery • Labor law violations 	Zero	Zero	 On track	Environmental impact Reputational damage Brand integrity Cost savings	No issues reported during FY22
Energy Management	Total energy consumed % from renewable sources	Improve	FY21 (electricity & gas) = 4629 MWh of which 27% is renewable assimilated in this case to renewable source	 On track	Environmental impact Cost savings	2022 data cover 20 of our locations, covering 95% of our FTE's. In 2021 we were reporting the figures of our 7 main locations (65% of the FTE's): despite the increasing of the scope covered in the reporting, we see a reduction of the energy consumption. Investments in energy reduction program are efficient.
Energy Management	Waste from operations <ul style="list-style-type: none"> • % hazardous • % recycled 	<2% hazardous waste, 100% recycled. Non-hazardous waste (wood, metal & cardboard/paper) 100% recycled	a) 2.48 tons hazardous waste produced. 99% recycled b) Non-hazardous waste: 154 tons generated-up by 7 tons vs. 2020, 92% recycled	 On track	Environmental impact Cost savings	Epoxy resins, paints and solvents will remain a key element of production needed in the lights. Slight increasing of waste explained by increasing of production volumes.

Our Performance On Key ESG

Environment, Social and Governance Indicators

MATERIAL ESG ISSUES	Key performance indicator	Aspirations	Results (2022)	Status	Impact	Explanation
Packaging	% of packaging that is recyclable	65%	Zero	 On track	Environmental impact Reputational damage Brand integrity Cost savings	No issues reported during FY22
	% 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"> FTEs Contract employees 	Zero	0 accident recorded in 2022	 Ongoing	Improvement employee engagement, healthy workforce focus, reduced insurance costs, brand integrity	ADB SAFEGATE maintains a safe workplace policy and training improvement system. The global QHSE employee and sustainability framework engagement implemented in 2021 is on-going.
	No. of major accidents: <ul style="list-style-type: none"> FTEs Contract employees 	Zero	0 OSHA recordable incidents - contract employees not included	 Ongoing		
Labor & working conditions	Employee turnover <ul style="list-style-type: none"> Voluntary and Involuntary 	Employee turnover target is 6%	11%	 To be improved	Improved employee engagement, healthy workforce, stability, reduced recruiting and training costs	FY21 had a decreased turnover rate (-5% in comparison with 2020) but remains high. Several programs are in place to reach the target of 6%.

Our Performance On Key ESG


Environment, Social and Governance Indicators

MATERIAL ESG ISSUES	Key performance indicator	Aspirations	Results (2022)	Status	Impact	Explanation
Staff training	% of executives (L1 & L2) that have received training in anti-bribery and corruption	100%	100%	 On track	Improved employee engagement, healthy workforce focus, reduced insurance costs, brand integrity	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	28 audits were performed on a global level	 Behind	Increased transparency, brand integrity	Suppliers and subcontractors are required to comply with a number of ESG requirements defined in the Business Code of Conduct. The Group has contracts with 500 suppliers, of which the top 10 provides 27% of the purchase volume. Already a big improvement in comparison with 2020, but still below the target.

Our Performance On Key ESG

Environment, Social and Governance Indicators

MATERIAL ESG ISSUES

	Key performance indicator	Aspirations	Results (2022)	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"> To design innovative products and solutions to deliver environmental, operational, and safety benefits to customers 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 & efficiency 	<ul style="list-style-type: none"> New AGL Axon portfolio is the first product in the AGL industry with a full Carbon footprint calculation. It's the most durable and maintenance friendly fixture for today's airfield. It's the first ever integrated powerline intelligence with sensors preparing the airport operations for the future. The development of second generation of Low Harmonic regulators has been launched with a targeted efficiency of 99% to improve power savings. The new generation of ILCMS units (LINK 360) will improve the capabilities of the airports to implement "Follow-the-Green" technology. This allows planes to be guided from landing to passengers exiting the aircraft, through the most efficient route possible at a given point in time (independent from marshalls' availability or weather), which reduces taxi time and fuel consumption The enhancement of the gate portfolio allows the airport operators to have a fully automatized management of aprons reducing the waiting time and consequently fuel consumption of the aircrafts. The continuous development and improvement of the services rendered by our regional centers for aftermarket improves response times towards customers and drastically reduces the frequency and duration of our service engineers, travel and lowers their carbon footprint 	 <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>The company has continued the improvement of its Product Line Management Procedure to incorporate circular economy principles and reduce its carbon footprint throughout all processes – from design and commissioning to purchasing, production, waste management, packaging, and transportation. This market-driven trend recognizes the importance of minimizing the carbon footprint and enhancing efficiency as decisive factors in product selection.</p> <p>2022 will be a milestone in our industry with the integration of the Carbon Footprint calculation of products in the PLM process. The exercise will be extended in the future to cover, step by step, the complete portfolio of the ADB Safegate Group.</p> <p>The primary objective of our airfield ground lighting solutions, apron management, tower, and airport systems is to decrease the number of aircraft movements between landing and the gate, which consequently reduces fuel consumption.</p> <p>As a result, we continue to focus on providing efficient solutions to maximize both economic and environmental sustainability for our clients.</p>

2.0. OUR POLICY AND APPROACH

ADB SAFEGATE is a socially responsible corporation that is focused on initiatives that create positive social and environmental impacts. ADB SAFEGATE's core values and ESG Policy demonstrate its commitment, guiding the company's efforts to enhance safety, sustainability, community support, and compliance.

The company's 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. The company acknowledges the importance of integrating CSR considerations into strategic planning and is confident in its ability to positively influence the environment and society.

By implementing ESG policies and strategy, ADB SAFEGATE strives to contribute 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 is present in 38 locations covering all major continents. We have seven main operational offices that include all processes: 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.

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	Hamburg	Melbourne
Amsterdam	Helsinki	Miami
Athens	Hong Kong	Minneapolis
Beijing	Horsens	New Delhi
Brussels	Houston	Paris
Burlington	Istanbul	Riyadh
Columbus	Johannesburg	Rome
Cran-Gevrier	Kuala Lumpur	Sacramento
Denver	Reading	Singapore
Doha	Madrid	Taipei
Dubai	Malmö	Thessalonikis
Eckental	Manchester	Tianjin
Graz	Mannheim	



PRODUCTION SITES

The four production sites, located in Brussels, Belgium, Columbus, OH, USA, Tianjin, China and Mannheim, Germany, are strategically located to best serve our customers. These locations support efforts to decrease our energy footprint by being closer to suppliers and customers. We're building our team globally around Centers of Excellence by technical competence and expanding our capabilities with the opening of our China Product Development Center and manufacturing facility in Tianjin, China, and a new U.S. headquarters complex with office, manufacturing and innovation center in Columbus, Ohio, opened in March 2023.



3.1.3 OWNERSHIP AND LEGAL FORM

ADB SAFEGATE is a privately held company. As of October 2017, following global regulatory approval and the completion of all formal administrative procedures, ADB SAFEGATE is owned by the Carlyle Group, one of the world's largest global investment firms. The change in ownership was an exciting step forward, reflecting further evidence of our potential as a high-growth company and solutions provider to the aviation sector.



3.1.4 COMPOSITION OF THE HIGHEST GOVERNANCE COMMITTEES

The ADB SAFEGATE Group operates with a functional structure, ensuring consistent execution of key processes worldwide. The organization's highest management level, the Executive Committee, consists of global managers.

Top management's primary responsibilities involve formulating a robust strategy and achieving business plan objectives. This encompasses strong financial performance, flawless project execution, exceptional customer experience, and increased market share. Additionally, the sustained development of a solid brand is vital – one that not only fulfills customer expectations but is also perceived as a leader in Environmental, Social, and Governance (ESG) requirements. To guarantee adherence to our ESG Policy, an ESG Committee has been established. This committee consists of the Executive Committee, the Legal & Compliance Officer, and two ESG managers. The Committee will oversee and give guidance to the Company's Board on key global ESG Matters and the general evolution of the ESG landscape. It will do this in relation to the Company itself and advise Company representatives on championing further progress within businesses partially or wholly owned by the Company on ESG Matters.



3.2 BUSINESS MODEL, MARKETS SERVED

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 1,300 personnel from 55 nationalities across 28 countries, we cater to more than 2,500 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 and
Executive Vice President Airfield



REGARDT WILLER
Chief Strategy & Marketing Officer



DOMINIC COTE VAILLANCOURT
Vice President Transformation, Service
and Chief Information Officer

AIRFIELD



Airfield: Safe, efficient & sustainable 2500-plus 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

GATE



Gate: 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

- 280-plus 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
- 120+ 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

AIRPORT SYSTEMS

Airport management systems: 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.

Moreover, 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 departure, 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.

Our ambition for the future



1
Strengthening our
technology leadership
in airfield and gate...



2
Strengthening our
technology leadership
in airfield and gate...



3
Pursuing operational and
organizational excellence
in fulfilling our promises to
customers...



4
Stepping up our
commercial game
where it matters...



5
Attracting, developing
and empowering the
best talent...

5 CLEAR PRIORITIES

4.0. PROTECTING THE ENVIRONMENT

We believe sustainability is imperative for the aviation industry. Our commitment to sustainability spans various initiatives – from an energy-efficient product portfolio which enables customers to reduce their environmental impact, to our environmentally friendly internal policies and processes which promote sustainability, not just in our business operations but also by spreading the message of ‘green operations’ among our employees and suppliers.



HELPING AIRPORTS REDUCE CARBON FOOTPRINT

Since the start of the century, we have been developing products and solutions that directly contribute to lower energy consumption and lower CO2 emissions. Our mission to improve airport performance focuses on optimizing airport operations by delivering solutions that support sustainable operational concepts such as SESAR's Follow the Greens (FTG) which aim to improve environmental performance. Results are impressive – FTG can reduce fuel burn and carbon emissions by as much as 40%. Moreover, our late generation products use components that are as individually – recyclable as possible.

ADB SAFEGATE pioneered the use of smart LED technology for airfield applications and has invested heavily in energy-efficient power systems. Moreover, the majority of components in our new generation of products can be recycled and no harmful substances are used in their production. Our intelligent Individual Lighting Control and Monitoring Systems (ILCMS) help save up to three minutes of additional taxi time per movement, reducing fuel consumption and emissions.

HOW OUR PRODUCTS ARE MORE ENERGY EFFICIENT

Compared to halogen, each LED light saves approximately 30 watts of power at 100% intensity. Considering all lights are on with 100% intensity they would save 25 kW of power. If we estimate the AGL lights are operational an average of 6 hours per day, this translates to an annual energy savings of 55.850 kWh just for a 21-stand apron.

Our automated SafeControl Apron Management and Safedock A-VDGS are designed to shorten the time from touchdown to gate. Eliminating flight delays and enabling shorter turns, the time spent waiting for gates is reduced thereby resulting in a significant reduction in wasteful fuel burn. Our solutions enforce the use of ground power units and track their status; this lowers the use of auxiliary power unit (APU) and fuel burn. Coupled with ADB SAFEGATE intelligent routing and guidance systems, our solutions lead the way to greener airports. Our tower solutions support controllers with optimized routing from touchdown to takeoff, cutting down fuel burn and in turn, reducing carbon emissions.

Our integrated portfolio includes a full range of aftermarket services that keep your airfield and gate systems running smoothly. These include support and maintenance, tackling key aspects of airport operations and maintenance, traffic handling and guidance. By using ADB SAFEGATE solutions, airports can expand efficiency instead of infrastructure and reduce environmental impact, power consumption, fuel consumption and overall, carbon emissions.

Solutions such as ALIS Airside Maintenance take account of every aspect of maintenance critical to the safe functioning of all visual guidance on an airfield. This advanced preventive maintenance solution improves overall safety, limits airfield activity and reduces down-time simultaneously, helping airports reduce environmental impact.

MANAGEMENT APPROACH

We are an ISO 9001, and 14001 certified company, and our headquarters in Belgium and plant in Sweden are ISO 45001 certified. Our company's quality and environmental policies, processes and systems frameworks are in accordance with these globally recognized standards. We have well-defined goals and systems and KPIs, to effectively measure and improve quality and environmental impact. These range from replacement of various energy-intensive systems to use of more efficient power sources, and improvement of waste management, among other aspects. This strongly reflects our sustainability philosophy, the primary goal of which is to reduce our carbon footprint.

CHECKS AND AUDITS

Every five years ADB SAFEGATE's heating installations are fully checked to make sure they comply to all the latest environmental requirements. We also organize an emissions audit (focus on heating) every four years. This audit leads to an understanding of the evolution and the potential losses in production and of our overall heating consumption in general. These audits result in actions that lead to extra investment or activities that reduce energy loss and emissions.

4.1. GREEN THINKING AND BIODIVERSITY

ADB SAFEGATE's ongoing awareness campaigns across our office locations help employees learn how they can reduce their individual carbon footprint by consuming energy mindfully, more environmental-friendly choices. In Belgium, we offer all employees a three-year bicycle leasing program, as part of an initiative to promote sustainable mobility.

GREEN SUPPLY CHAIN

ADB SAFEGATE promotes responsible procurement throughout its supply chain. Most of our suppliers guarantee that no hazardous materials are used in the products they deliver and that their processes minimize material waste and environmental impact.

The Environmental Protection section in our Supplier Code of Conduct sets clear guidelines to:

- Act in accordance with the applicable statutory and international standards regarding environmental protection.
- Minimize environmental pollution and make continuous improvements in environmental protection.
- Use best effort to implement an environmental period management system in accordance with ISO 14001 or equivalent.

4.2. PRODUCT SUSTAINABILITY AND CIRCULAR ECONOMY

ECO-FRIENDLY PRODUCT PACKAGING

Our focus extends to the waste produced by our product packaging. As part of our ISO 14001 goals, we are switching to packaging that is partially or completely made of recycled materials. We are working closely with our key suppliers to find ways to achieve this.

More than half of the packaging ADB SAFEGATE uses for its lighting and power solutions is currently made of recycled paper. The goal is to further increase this level and limit any use of other packaging materials other than paper or cardboard. Other than packaging for its products, ADB SAFEGATE uses euro pallets to transport products and materials. These pallets are made from wood and can therefore be used for a long period and recycled at end of life.

GREEN RETURN POLICY

Customers in Europe can return products to ADB SAFEGATE at Zaventem, Belgium and in cooperation with local main sites or offices. We partner with our recyclers to ensure these products are recycled responsibly.



4.3. ENERGY EFFICIENCY AND CARBON EMISSIONS

CLEAN POWER AT ZAVENTEM HQ

ADB SAFEGATE has successfully transitioned to renewable sources of energy to power its operations at the corporate headquarters.

Since 2015, the electricity consumption at our offices in Zaventem, Belgium is completely carbon neutral – 100% of the electricity is generated through renewable sources.

ENERGY AND EMISSIONS REPORTING

The first step towards sustainability is awareness of consumption. Every month, ADB SAFEGATE tracks its energy consumption both in terms of electricity and natural gas. The Environmental Management Systems committee (comprising representatives from across our operations) set up in line with the ISO 14001 specifications, reviews these reports to understand how consumption can be further decreased. We report this information to our shareholder and owner – The Carlyle Group.

PRODUCTS DESIGNED TO ENABLE ENERGY SAVINGS

Every new product is designed to substantially decrease energy consumption – this is one of the targets we consciously set forward. By enabling airports and other customers, from around the world, come closer to their sustainability goals, we're driving a far greater impact than our own actions.

SAFER GUIDANCE FROM INTELLIGENT, ENERGY-FRIENDLY LIGHTING

ADB SAFEGATE's RELIANCE Red/Green taxiway light uses LED technology, and is based on our RELIANCE modular approach and our unique IQ intelligent lighting platform. An

industry-first, the light output switches between red and green, and serves the dual function of a taxi-way centerline light and a stop bar, to support safer routing and guidance. While stop bars are still needed at runways or crossing taxi-ways, airports can use fewer stop bars on the airfield when they install this light to control aircraft ground movement and to stop planes mid roll. For large-scale deployments, this can be significant.

4.4. WASTE AND WATER MANAGEMENT

We do not undertake any work that involves the use of hazardous substances such as acids, solvents, or heavy metals. We focus on responsible use and waste minimization, and ensure material waste following production is recycled as per industry best practices. Our commitment is reflected in ambitious goals such as requiring that 90% of waste at our key sites be recycled. Progress on these indicators is tracked and reported annually.

ADB SAFEGATE's active recycling policy encourages recycling of all materials - wood, metal, packaging and chemical waste – used during the production of its products. Materials are managed by specialized and accredited companies that recycle all components in accordance with Belgian and other local governmental rules, and are aligned with the ISO 14001 process.



5.0 RESPECT FOR PEOPLE, DIVERSITY AND HUMAN RIGHTS

As a global company, we are more than 1,200 employees from 50 nationalities across 37 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 continue to engage with our employees to create a work culture that values human talent.

With our new organizational structure introduced in 2020, there is an even greater emphasis on innovation. Our airfield business line has divided R&D into two separate groups, with a dedicated team pursuing AGL innovation.

Recently, ADB SAFEGATE Austria was recognized as a top employer for 2020/2021 by Great Jobs Employer Screening.

5.1. LABOR AND WORKING CONDITIONS

We strive to provide a work environment where our employees feel free to engage in collective bargaining agreements. We are currently reviewing the data on how many employees are covered by such agreements throughout the many locations and jurisdictions in which we operate.

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

Personal

- Emotional wellbeing
- Managing stress
- Anxiety and depression
- Disability and illness
- Substance & alcohol misuse
- Addictions & compulsive behaviors
- Personal development

Live events

- Pregnancy and new baby
- Adoption
- Marriage and cohabitation
- Separation and divorce
- Moving home
- Bereavement and loss
- Retirement

Work

- Work-life balance
- Bullying and harassment
- Workplace pressure
- Managing change
- Careers
- Workplace relationships

Daily living

- Consumer rights
- Health and wellness
- Debt and money management
- Community Resources

5.3. OUR PEOPLE: OUR MOST IMPORTANT ASSET

Helping employees to achieve total wellbeing

International studies show that one in four employees suffers from issues related to meeting the demands of work and personal life on a regular basis. The lines between work and home blurring amid lockdowns only exacerbated the problem. Ensuring employees weigh in on their work/life balance helps mitigate the risk of sickness or mental health issues.

ADB SAFEGATE introduced 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 counseling, 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.

Family & Relationships

- Childcare
- Education
- Elder care
- Juggling work and family life
- Caring for other
- Domestic violence or abuse

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. We focus on building relationships based on trust, people who can communicate well with others, confide in others and who can manage important shared interests. Overall, our workforce spans 50 nationalities and the average employee age is 42 years.

While the multicultural environment is a plus, we are concerned that our gender distribution shows only 17% females in the workforce to 83% 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. As a global organization, we are committed to ensuring equal opportunity and diversity, and improving our workplace to promote employee engagement and wellbeing.

Apart from ongoing initiatives to promote cultural sensitivity, exchange programs allow our employees from around the world to learn more about each other and collaborate even better. Quarterly updates and regular CEO communication with our employees ensure we reach out to our global teams.

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 in 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.

6.0 RESPONSIBILITY AND INTEGRITY IN BUSINESS CONDUCT

HIGHLIGHTS

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

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. Technically, ADB SAFEGATE is committed to follow an extensive set of international standards due to activities at airports with Airfield, Gate and Tower applications. The six aspects of the value proposition have their own regulatory environment.

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) IECxxxx 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

GATE

- 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



7.0 COOPERATION WITH OTHER STAKEHOLDERS

ADB SAFEGATE collaborates with institutions and communities where we are present, and where our employees live. Our goal is to contribute in a meaningful way and make a difference in the lives of the people we engage through our initiatives. This year, we continued to work with communities, though restrictions on social contact resulted in fewer events and opportunities to connect.

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.

8.0 KEY DATA AND REPORTING PRINCIPLES

CLAIMS OF REPORTING ACCORDING TO GRI STANDARDS

ADB SAFEGATE has begun looking into the implications of orienting ourselves on the GRI standards. Therefore, we make no claim to be in accordance to these standards yet.

9.0 EXTERNAL ASSURANCE

We have not sought external assurance on this report, as we consider this still “work in progress” while we embark on our journey to more closely conform to globally accepted standards. We may use an external assurance service in the future, and continue to engage with independent consultants as and when needed to fine tune our business strategy, respective priorities, and mitigate risks.

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.

Our suppliers do not employ workers under the age of 15, or, in countries subject to the developing country exception of the ILO Convention 138, under the age of 14. We disallow forced labor, modern slavery and human trafficking.

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 and
- Are 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 must also be 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.

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.

Further information and contacts

These guidelines define what "integrity" means for our business. Please refer further questions to the Group Compliance Officer Nancy.Vancampenhout@adbsafegate.com.



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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