



BUSINESS INTEGRITY AND ETHICS

Code of Conduct and Business Ethics

How every Accenti person is expected to behave — with clients, colleagues, communities and each other.

Date 22 October 2026
Reference AC-CMP-POL-002 · Revision 00
To All employees, temporary personnel, contractors and subcontractors working for or on behalf of Accenti LLC

Issue of the Code of Conduct and Business Ethics, AC-CMP-POL-002, Revision 00

Dear colleagues,

I am pleased to issue the Accenti Code of Conduct and Business Ethics, effective 22 October 2026. It applies to everyone who works for Accenti, at every level, and to those who act on our behalf.

Our clients trust us with their sites, their people and their programmes. That trust depends on how each of us behaves, including when no one is watching. This Code brings our policies together in one place and sets out what we expect.

Managers are asked to lead by example, to make sure their teams understand the Code, and to listen when someone raises a concern.

Please read the Code, sign the acknowledgement at induction, and speak up if you see something that is not right. Compliance is mandatory.

Yours sincerely,


Ali Ahmed Dhadhaow
Chief Executive Officer
Accenti LLC



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WEB

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DEFENSE INFRASTRUCTURE

MISSION SUPPORT

Code of Conduct and Business Ethics

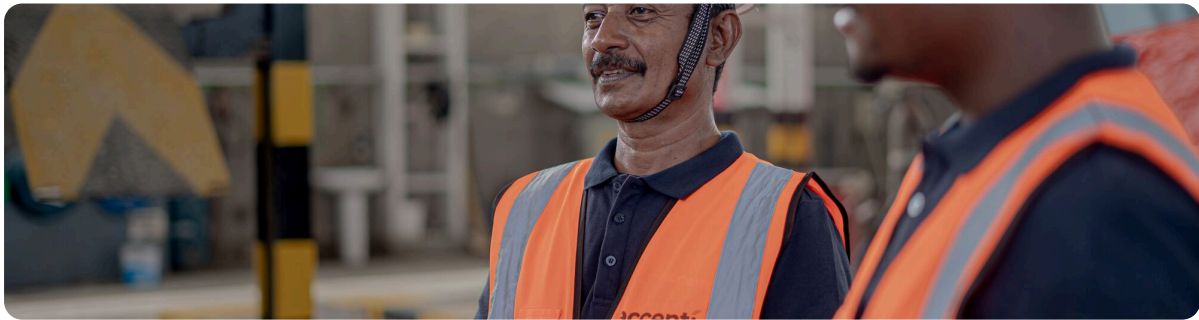
DOCUMENT	REVISION	EFFECTIVE	STATUS
AC-CMP-POL-002	00	22 Oct 2026	Approved / Issued
APPROVAL AUTHORITY		POLICY OWNER	
Accenti LLC Management		Finance Department (Compliance)	
APPROVED BY		APPROVED ON	NEXT REVIEW
Ali Ahmed Dhadhaow, Chief Executive Officer		22 Oct 2026	22 Oct 2027

Controlled document. Approval is evidenced by the signed and sealed cover letter. The current revision is held by Finance (Compliance); printed copies are uncontrolled.

Every Accenti employee and representative shall act honestly, lawfully, safely and with respect, and shall protect the trust that clients, colleagues and communities place in Accenti LLC.

1 Application

This Code applies to directors, managers, employees, temporary personnel and to agents, contractors and subcontractors acting on behalf of Accenti. It sits above, and links to, every other Accenti policy.



■ Respect, honesty and safety in every working relationship.

2 Standards of conduct

- 2.1 Obey the law. Comply with the laws of every country where Accenti works, client site rules and the conditions of our contracts.
- 2.2 Work safely. Follow the Industrial Safety Policy. Stop work that is unsafe and report hazards, incidents and near misses.

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- 2.3 Act with integrity. Never offer, give, request or accept a bribe. Declare gifts, hospitality and conflicts of interest under the Anti-Bribery and Corruption Policy.
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- 2.4 Respect people. Treat everyone with dignity. Harassment, discrimination, bullying, sexual exploitation and abuse are prohibited.
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- 2.5 Protect company assets and information. Use vehicles, equipment, funds and systems only for legitimate company purposes. Keep client and company information confidential.
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- 2.6 Respect communities and the environment. Behave respectfully towards host communities, prevent pollution and leave sites as we found them, or better.
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- 2.7 Keep accurate records. Record time, expenses, transactions and inspections truthfully and completely.
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3 Speaking up

Report any suspected breach of this Code through the channels in the Whistleblowing and Non-Retaliation Policy (AC-CMP-POL-003). Reports made in good faith are protected; retaliation is a disciplinary offence.

4 Responsibilities and enforcement

Management shall lead by example and resource the Code. Managers shall brief their teams and act on concerns. Every person shall read, acknowledge and follow the Code. Breaches shall result in disciplinary action up to dismissal and, where required, referral to the authorities.

5 Implementation and review

The Code shall be acknowledged at induction and refreshed annually. It shall be reviewed at least annually or after any significant breach or change in law.

Do the right thing, especially when no one is watching.

Questions about this policy?

Questions about the Code, and concerns about conduct, go to Finance (Compliance), Human Resources or directly to the Chief Executive Officer.

Operations — Somalia

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Headquarters

United Arab Emirates

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Policy owner

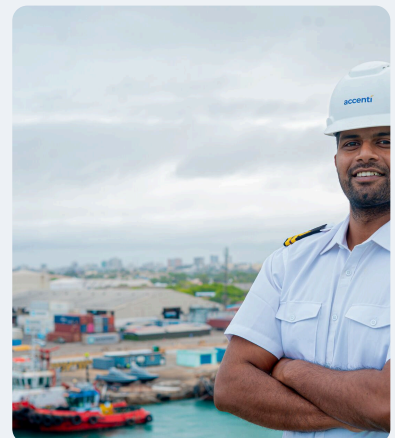
Finance Department (Compliance)
AC-CMP-POL-002 · Revision 00

■ On every site

When in doubt, ask

If something feels wrong, or you are unsure what the Code requires, ask your manager, Compliance or HR before you act.

info@accenti.com →





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