



The Core42 Code
Integrity at our Core

core42
A G42 Company



01. Welcome

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01. Welcome

Welcome to the Core42 Code



At Core42, we're not just building world-class AI and cloud infrastructure – we're shaping the future with purpose, resilience, and integrity. The Core42 Code (Code) is your guide to how we work, make decisions, and live up to the trust placed in us by our partners, our customers, and each other. Challenges will come, and we expect them. But we meet them with grit and determination, finding the right way forward while staying true to our ethical, legal, and contractual responsibilities.

We are driven by passion and are committed to excellence, approaching each opportunity with curiosity, energy, and a deep sense of responsibility. We take pride in the quality of our work – but just as importantly, we ensure that how we deliver is as strong as what we deliver. Our growth is measured by the impact we create – for our people, our communities, and the future we're building together. Respect, responsibility, and collaboration aren't just in the Core42 Code – they're lived in every decision we make.

Our Code isn't about rules – it's about confidence. It empowers every one of us to make principled decisions, especially when the path isn't clear. It's a shared commitment that unites us – wherever we sit, whatever our role.

Thank you for the passion, judgment, and integrity you bring every day. Let's keep moving fast, solving hard problems, and leading with what's right.

Talal Al Kaissi

Chief Executive Officer (Interim), Core42



Grit

Forged by Challenges, Defined by Grit

We overcome challenges with determination – and we never compromise on ethics or our obligations.



Passion

Driven by Passion, Committed to Excellence

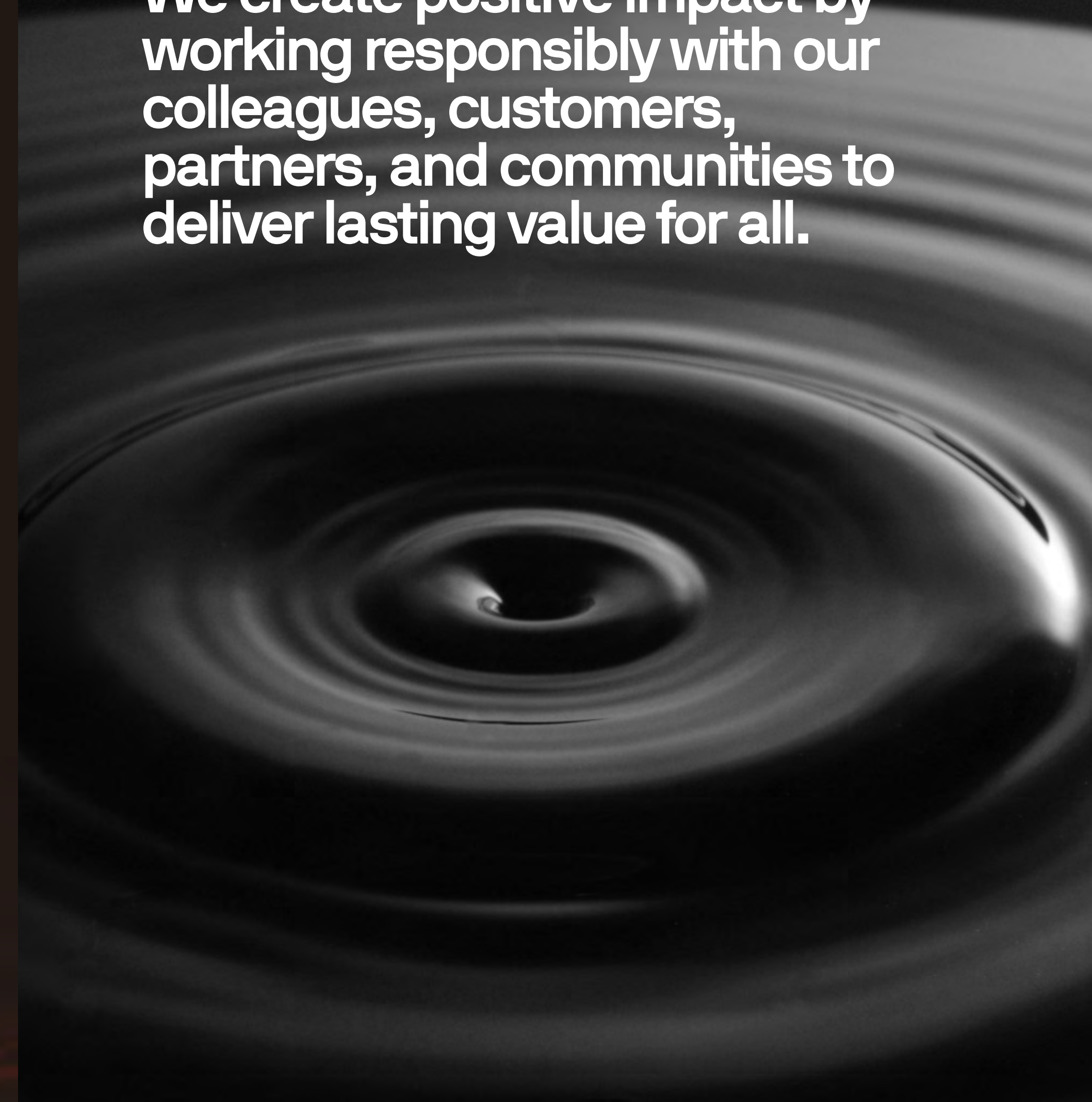
We move with energy and deliver with integrity. Ethics defines how we work



Impact

Creating Impact, Inspiring Progress

We create positive impact by working responsibly with our colleagues, customers, partners, and communities to deliver lasting value for all.



03. Society

Working together for the betterment of Society

3.1 Who we are

Core42, is a G42 company and technology leader born from the merger of G42 Cloud and Injazat. We combine world-class expertise in cloud computing, AI research and cybersecurity services to enable national and enterprise digital transformations.

Our goal is to empower governments, enterprises and industries to unlock the full potential of AI. We do this by delivering sovereign cloud, confidential computing and high-performance AI infrastructure – underpinned by architectures that meet the needs of highly regulated sectors.

Operating across the UAE, US, Europe, Africa and Southeast Asia, Core42 offers managed services and platform solutions that accelerate responsible, auditable and resilient AI adoption at scale.

At Core42, we believe that AI is a force for good – a transformative tool capable of enhancing every aspect of life. We recognise that the most impactful outcomes emerge when talented individuals and organizations collaborate across borders.

By fostering mutual understanding, respect, and appreciation of one another's strengths, we unlock innovation and value. That's why we conduct our business with integrity, transparency, and a deep commitment to responsible progress.



04. Expectations

Applying This Code and What Is Expected of You

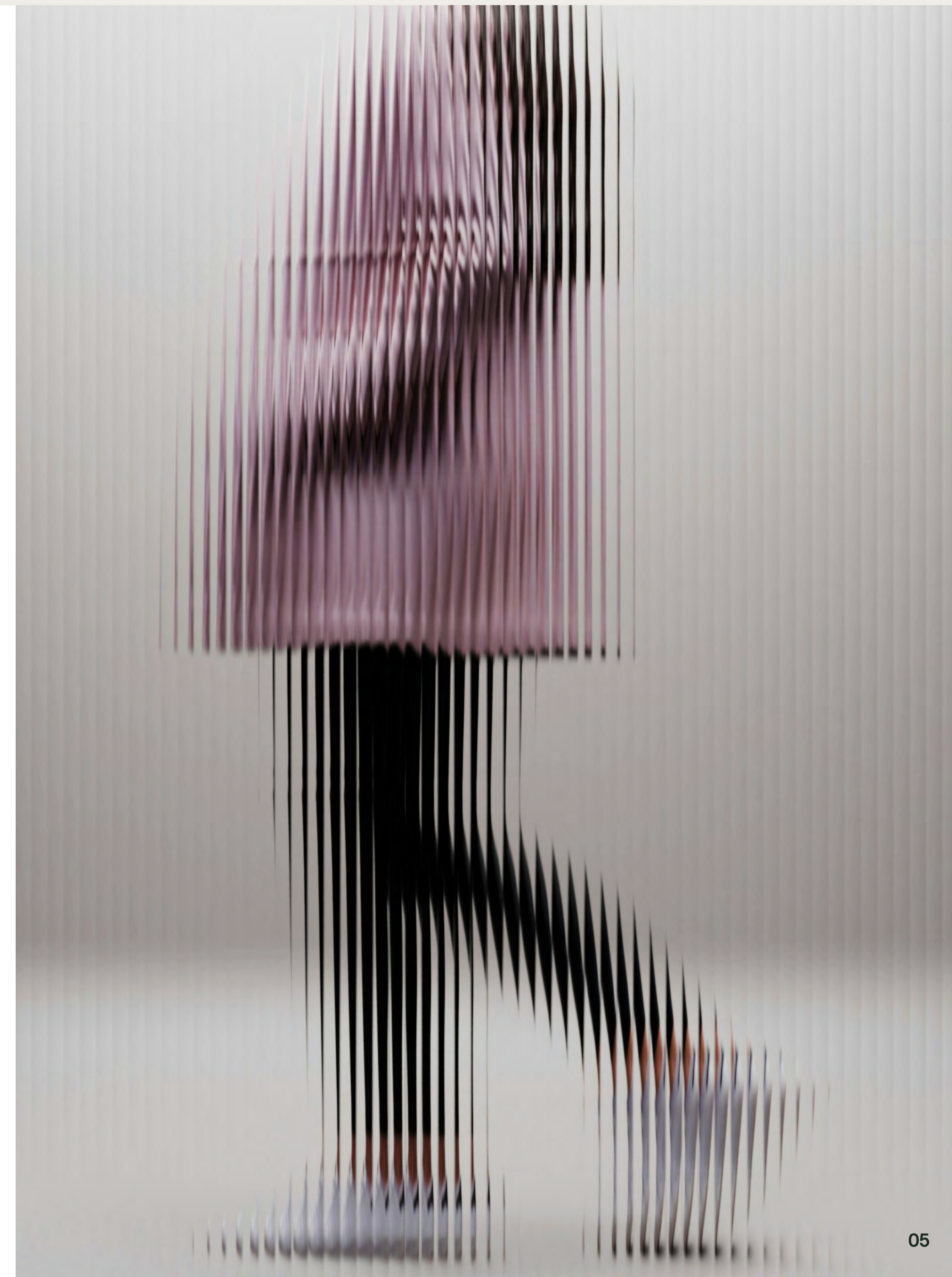
We expect all Core42 Employees to read, understand and apply the principles set out in this Code. You should consult with your line manager or the Ethics and Compliance Office if you ever need guidance on any aspect of the Core42 Code.

4.1 Using the Code

The Core42 Code, along with its subsidiary policies and manuals, applies to all Core42 entities and employees. It sets out our guiding principles and the standards of conduct expected of everyone who represents Core42. Our goal is to uphold the highest standards of integrity and to comply with all applicable laws.

While this Code addresses many business practices and expectations, it cannot cover every situation or answer every ethical question. If you're unsure how to apply it in a particular case, seek guidance from your line manager or the Ethics & Compliance team (ethicsandcompliance@core42.ai).

Each of us is responsible for acting respectfully and with integrity, and modelling our values in every decision. The Code and related policies are there to support sound judgment – but when the rules are unclear, they never excuse poor choices or unethical behaviour.



4.2 Who the Code is for

The Code applies to all Core42 Employees, a copy of which is available to all new employees when joining and to the entire population on the company intranet, MAG.

All Employees must confirm that they have read the Code and must certify that they agree to comply with it each year.

This Code should be read with the Ethical Labor Practices Manual, Quality, the Health, Safety, and Environment (QHSE) Manual as well as other supporting policies such as the [Gifts and Entertainment Policy](#), [Whistleblowing and Non-Retaliation Policy](#), and others – all of which are also available on MAG.

Together they set out the minimum standards of behaviour we require at Core42.

4.3 Diversity, equity and inclusion

Creating a diverse, equitable and inclusive working environment is essential if Core42 is to achieve its full potential.

The strength of our Company is enhanced by the differences between each of us, and so we are committed to eliminating any form of bias.

We ensure a safe and inclusive working environment for all that is free from discrimination and harassment. Section 5.5 covers this in more detail.

It is all our responsibility to uphold these beliefs and to actively contribute to the creation of an inclusive environment and to report any instances of discrimination.

4.4 Making the right choice and consequences of non-compliance

The choices we make can impact our colleagues and the Company as a whole.

All Core42 Employees must act with integrity and be accountable for their decisions. This means complying with our policies and holding ourselves and our peers to the required ethical standards.

Those who fail to do this put our customers, their colleagues, the Company, and themselves at risk. If your conduct is found to violate this Code, you may be subject to disciplinary action in keeping with The Disciplinary Policy*, up to and including, loss of employment.

In such situations, Core42 may, at its sole discretion or where required by law, disclose information about breaches of law to the relevant authorities.

4.5 Reporting concerns and unethical behaviour or misconduct

If you witness or suspect unethical conduct, breaches of this Code or any other policy, including fraud, or any serious incident that could harm Core42's reputation or interests, you must report it to your line manager, or at <https://core42.speakup.report/speakup>, or directly to ethicsandcompliance@core42.ai.

Core42 and our leadership value Employees who speak up and empower them to do so. Raising concerns helps us to protect our culture, uphold our standards, and strengthen the long-term integrity and success of our company.



Scenario 1 Data Privacy Concern

Q: Priya notices a teammate transferring client personal data onto a personal USB drive. She believes that this violates our data-protection policies.

What should she do?

A: Priya should act promptly and responsibly to prevent potential harm. She should first pause the risk, where appropriate, by asking her teammate—calmly and professionally—whether there is a legitimate business need and an approved, secure method for transferring the data.

If it becomes clear that the USB drive is personal, unencrypted, or not authorised, Priya should ask that the transfer stops immediately and that the data is secured using an approved company system.

Priya should then escalate the issue without delay to her line manager. If the manager is unavailable, or if she is uncomfortable raising it locally, she must report the concern directly to the Ethics & Compliance Team at

ethicsandcompliance@core42.ai, providing factual details of what she observed so the data can be secured and any potential breach assessed and contained.

Priya should not attempt to investigate the matter herself, copy the data, or confront the teammate beyond what is necessary to prevent immediate risk.

Key Takeaways:

- Act to reduce immediate risk – stopping or questioning an unsafe transfer can prevent a data breach.
- Ask, don't accuse – seek clarification professionally before jumping to conclusions.
- Escalate quickly and appropriately – use managers or formal channels when policies may be breached.
- Do not investigate independently – preserve facts and allow specialists to handle the issue.
- Protecting personal data is everyone's responsibility and fundamental to Core42's compliance culture.



Scenario 2 Conflict of Interest

Q: Carlos learns that his project lead's spouse owns a company bidding for Core42 work related to a project he is managing. What should he do?

A: Carlos should raise the concern immediately with his line manager or the Ethics & Compliance Team at ethicsandcompliance@core42.ai. Even if no wrongdoing has occurred, this situation presents a potential conflict of interest that must be disclosed to protect the integrity of Core42's procurement process.

Prompt reporting ensures transparency & allows an impartial review – helping maintain fairness, trust, & accountability in supplier selection.

Key Takeaways:

- Disclose potential conflicts early – transparency helps prevent reputational and ethical risks.
- Even perceived conflicts matter – they can undermine trust even when no rule is broken.
- Seek guidance, don't assume – speak to your manager or the Compliance Team if unsure.
- Integrity in procurement protects both Core42 and individual employees from bias or misconduct.

4.6 A Word about Retaliation

Core42 does not tolerate any form of retaliation towards Employees who report suspected unethical behaviour or misconduct.

Any person who retaliates against another for raising a concern may be subject to disciplinary action.

There is more about this in our [Whistleblowing and Non-Retaliation Policy](#)

4.7 Confidential Information and Intellectual Property

We are a fast-growing business, building extraordinary knowledge and capabilities with our partners and affiliates in the field of AI and cloud computing.

As a result, we have access to ground-breaking products and sensitive information that must be protected and kept confidential. This includes intellectual property such as copyrights, patents, trademarks, licenses, and trade secrets.

Protecting this information is essential to maintaining our competitive edge, fulfilling our legal and contractual obligations, and preserving trust with our stakeholders.

Everyone at Core42 is required to handle confidential information responsibly and in accordance with our policies.

4.8 Insider Information

As an Employee, you must be careful not to disclose any insider information you access during your time at Core42 to anyone who is not authorised to receive it.

You are also prohibited from using such information for your own benefit or the benefit of others, unless it has already been made public by the company.

Breaching these obligations may lead to disciplinary action and could amount to a criminal offence.

Contact the Core42 Ethics and Compliance Team if you are unsure about your responsibilities in relation to Insider Information. Read more about this in the [Insider Information Policy](#).

05. Integrity

We Conduct Business with Integrity and Transparency

5.1 Records Management Protocols

We have clear policies and procedures related to records management. You must regularly review paper and electronic files and discard or delete any records for which there is no continuing business or legal reason to retain.

When disposing of records, you should do so in a way that reflects the level of confidentiality and sensitivity of the information they contain.

We comply with all legal requirements concerning the preservation of specific records, including legal holds imposed by Core42 counsel in connection with anticipated or actual litigation or investigations.

5.2 Data Protection

It is our policy to take appropriate steps to protect information relating to individuals, whether they are Core42 Employees, customers, investors, or suppliers. We collect, process, and transfer personal data to external parties for lawful and legitimate business purposes solely.

We must safeguard the confidentiality and security of personal data, respect individual privacy, and ensure compliance with data protection laws in every jurisdiction in which we operate.

Our practices regarding the handling and processing of personal data are governed by the [Data Protection Policy](#) and its subsidiary policies and procedures.

What is Personal Data?

Any information that relates to an identified or identifiable individual – whether client, user or staff member. Common examples:

Identifiers: Name, employee ID, date of birth

Contact & login details: Email, phone, IP address, usernames

Usage & activity logs: Login times, access records, telemetry tied to user or staff accounts

Sensitive & HR data: Health records, performance reviews, payroll or benefits information

Location & device info: GPS coordinates, device IDs





5.3 Health, Safety and the Environment

We are committed to act in accordance with laws, regulations and policies which govern a range of issues in this area. These include, hazardous materials, emissions, waste and wastewater management and discharge, pollution prevention, occupational health and safety, prevention of chemical exposure; emergency prevention, preparedness, and response.

All Core42 Employees have responsibilities towards the prevention of health and safety or environmental incidents. If any Employee becomes aware of a hazard or cause of injury or illness at work, they must report it, as well as all incidents and near misses to fadmin@core42.ai. As a Core42 Employee you must also commit:

- To adhere to all existing procedures, systems, and good management practices in place to prevent, manage, track and report occupational injury and illness.
- To look for opportunities to eliminate, mitigate, and/or reduce potential hazards in the workplace.
- To use all required personal protective equipment, as required when at work or when performing company tasks.
- To attend all assigned occupational health and safety training and programmes, and to carefully read and understand all educational materials about the risks associated with workplace hazards.
- To adhere to all written safe-work practices. Please refer to the Core42 Quality, Health, Safety, and Environment (QHSE) Baseline Requirements Framework and all related policies and procedures.
- Not to use, possess, distribute, or sell any illegal drugs. In this context, "illegal drugs" are any prohibited substances in the host country of the applicable Core42 company or project, or the abuse of any other prescription or other lawfully controlled substances.
- To make yourself aware of all emergency preparedness procedures and adhere to them. To comply with all requisite drills and training courses to ensure emergency preparedness.
- To seek opportunities to implement reasonable actions that improve overall health and safety in our operations.
- To pay careful attention to and follow guidance contained in all occupational health and safety communications issued by Core42 and ask questions when unsure about how to comply.
- Foster a "safety first" culture by actively seeking every Employee's feedback on health and safety issues – and ensuring everyone is responsible and accountable for prioritizing health, safety, and well-being.

5.4 Avoid Conflicts of Interest

We require all Employees to declare any potential conflicts of interest. A conflict of interest is any personal or outside interest that may conflict with your role and responsibilities to Core42.

Conflicts of interest can adversely influence your judgment, objectivity, or loyalty when conducting business activities or assignments for Core42. Even the appearance of a conflict could be used by someone to question your judgment or the reputation of the Company.

You have a duty to advance Core42's legitimate interests and must report any conflicts or potential conflicts of interest as soon as you become aware of them. Disclosing a conflict of interest does not necessarily mean that you have done anything wrong. It does however, allow us to assess the situation and, if necessary, take steps to manage the conflict and protect both you and the Company.

Conflicts of Interest

- Working on Core42 business that involves a family member or close acquaintance.
- Investing in a Core42 client, supplier, or competitor.
- Accepting employment with a Core42 competitor.
- Taking personal advantage of a business opportunity discovered in the course of your work for Core42.



Scenario 3 Personal Investment Creates Divided Loyalties

Q: Amira, a procurement senior executive at Core42, is helping to select vendors for a major technology upgrade. One of the shortlisted suppliers is a company in which Amira recently bought shares.

She genuinely believes in the supplier's quality but hasn't disclosed her investment. What should Amira do in this situation?

A: Amira should immediately disclose her financial interest to her line manager and the Ethics & Compliance team. Even if her judgment remains impartial, the appearance of bias can damage trust in the process.

By declaring the conflict early, Core42 can assess the risk and decide whether Amira should be recused from the selection process to maintain fairness and transparency.

Key Takeaways:

- Conflicts of interest can exist even when no improper action occurs – the appearance alone can undermine confidence.
- Always disclose financial or personal interests that relate to Core42 business decisions.
- Transparency protects both you and Core42 from reputational and ethical risks.
- When in doubt, seek guidance from Ethics & Compliance before proceeding.

As part of the annual Code of Conduct acknowledgement process, you will be required to submit a declaration confirming that you have disclosed all and any conflicts of interest to the Ethics and Compliance team, and any conflicts will then be managed by your line manager. You may contact the Ethics and Compliance team

(ethicsandcompliance@core42.ai) for advice and assistance in making a disclosure. Refer to the [Conflicts of Interest Policy](#) for more information.

5.5 Treat Each Other with Respect

Mutual understanding, respect, and recognition of one another produce the best possible outcomes. We are committed to treating our colleagues, customers, and business partners with professionalism, fairness, and courtesy always.

This means:

- Valuing diverse perspectives, backgrounds, and experiences
- Communicating openly and constructively, even when we disagree
- Challenging ideas and behaviours respectfully, without personal attacks or intimidation
- Acting with integrity in all interactions, whether in person, online, or in written communications

Disrespectful behaviour, such as harassment, bullying, discrimination, or exclusion, has no place at Core42 and will not be tolerated.

5.6 Be Clear and Candid in Our Public Communications

Core42 is committed to providing timely and accurate information to the public, as well as protecting its own intellectual property and confidential information.

We have an international reputation which can be enhanced or harmed by what people hear about us, either directly or through the media. It is critical that we are cautious about the information we share and that our external communications are coordinated and consistent, are aligned with our values, and are aimed at achieving Core42's vision and mission.

All advertising, promotional, and marketing materials must be truthful and must not mislead. Claims made in advertising must be supported by evidence and approved in advance through the appropriate internal channels.

Communicating With the Media

You must not communicate or interact directly with the media, government, regulators or any outside parties unless authorised to do so. Instead, you must refer all media and related enquiries to our Marketing and Communication Department (communications@core42.ai).



5.7 Use Social Media Platforms Responsibly

Social media platforms present an exciting way for Core42 and its Employees to engage with key audiences, showcase thought leadership and explore opportunities for collaboration.

The nature of social media, however, is such that there are also inherent risks associated with its use. Posts are visible immediately to the entire world, content cannot be retracted, and messages spread more quickly than traditional media.

When using social media, you must use platforms responsibly, with good judgment and in a way that complies with local laws. Be smart and emotionally intelligent with your content and think about how it may be perceived by others. Refer to the [Social Media Policy](#) for more details.

If you make a mistake and post content that could be detrimental to Core42, its customers, partners or stakeholders, you must report it to the Marketing and Communications Department (communications@core42.ai) as soon as you become aware.



Scenario 4 Think before You Post!

What happened:

Jamal, a systems engineer at Core42, posts on LinkedIn: "Just wrapped a major GPU deployment powering AI workloads for a key government client." A journalist comments asking which client he means, prompting internal concern.

What's the issue:

The post may disclose or imply confidential information, including the existence of a government contract, and could breach NDAs, security obligations, or client confidentiality requirements.

Right response:

Jamal should limit further exposure immediately by hiding or restricting the post (rather than engaging further), take a screenshot for record-keeping, and promptly notify Marketing & Communications at communications@core42.ai for guidance on next steps.

Better approach:

- Avoid posting details about live or completed projects without approval
- Do not name, hint at, or imply specific clients or sectors
- When in doubt, seek Communications approval before posting

Key takeaway: Think before you post. If there is any uncertainty, check with communications@core42.ai first.

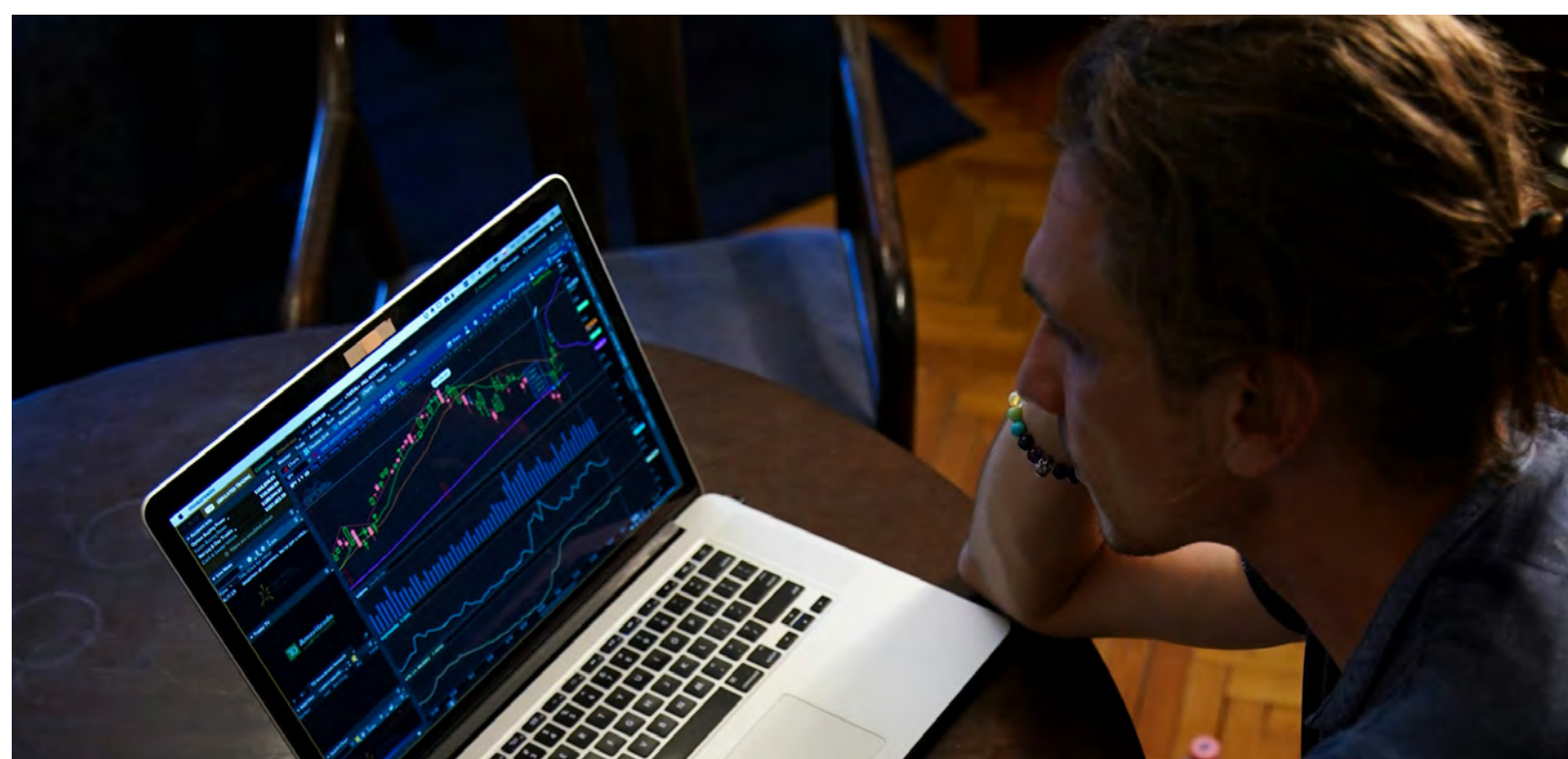


5.8 Partner with Purpose and Principles

We believe that the best results arise when we collaborate with organisations and talent the world over. However, working with business partners who fail to meet high legal and ethical standards can expose Core42 to serious risks – including risks to our reputation, fines, penalties, loss of licences, or restrictions on government contracts.

As such, before engaging in any legally binding agreement, Core42 will conduct appropriate risk-based due diligence on potential Business Partners, including checking their legitimacy and background and monitoring them throughout the course of their relationship with Core42.

Employees must ensure that Business Partners are selected to work with Core42 based on merit and in line with procurement policies, processes and where applicable, the [Business Partner Due Diligence Policy](#).



5.9 Responsible and Ethical AI

Core42 is committed to using AI responsibly, ethically, and in line with applicable legal, regulatory, and organisational requirements. Employees must ensure that AI systems are used safely, transparently, and without bias.

All AI-related activities must comply with internal governance guidelines and the [G42 Responsible AI Policy](#), which sets out the principles and expectations for safe and ethical AI use. Employees working with AI must review and follow this policy and seek guidance when unsure.

5.10 Employee Cybersecurity Responsibilities

Every employee plays a crucial role in protecting Core42's information assets, systems, and digital infrastructure. Employees must comply with established security policies, standards, and procedures at all times, including safeguarding login credentials, reporting suspicious activities, and ensuring secure handling, transmission, and storage of data.

Employees are expected to identify and immediately report incidents, phishing attempts, unusual system behaviour, or any potential compromise to the Information Security team, infosec@core42.ai. Strict adherence to password hygiene, multi-factor authentication, and access control practices is mandatory. Employees must participate in role-appropriate cyber

5.11 Acceptable Use of Technology and Assets

Employees must use Core42's systems, networks, devices, and digital tools responsibly and only for authorised business purposes. Misuse, unauthorised access, inappropriate content use, or activities that pose security, legal, or reputational risks are strictly prohibited.

All employees must comply with internal guidelines and the [Core42 Acceptable Usage Policy](#), which provides detailed rules on proper use, security expectations, and prohibited activities. When in doubt, employees should consult this Code or seek clarification from the relevant function.

06. Purpose

We Serve the Greater Good

6.1 Environmental, Social and Governance (ESG)

Our approach to ESG is governed by our [ESG Policy](#), which sets out Core42's goals and actions in this regard.

The ESG Policy records Core42's commitment to integrate ESG into its business strategy, operations and culture.

We are dedicated to responsible business practices, managing environmental risks, promoting sustainability, supporting social responsibility, and upholding strong governance in line with industry standards and regulatory expectations.

By upholding ESG principles, we aim to reduce our environmental impact, create long-term value, and contribute positively to society.

We operate globally, yet we are part of the local communities where we live and work.

We believe that positive involvement and engagement with our neighbours promotes mutual respect and trust while enhancing our reputation and our ability to attract high quality talent.



07. Legal

We Honor Our Legal Obligations

7.1 Ensuring Fair Competition

Core42 is committed to competing fairly in all markets, remaining in full compliance with applicable competition laws and in an ethically justifiable manner.

We will not engage with or tolerate any Employees engaging in anti-competitive behaviour, such as price fixing, bid rigging, market sharing or abuse of market power.

We do not discuss, make or appear to make improper agreements with, or collude with Business Partners, about markets, pricing, contracts, bids or quotes, costs.



7.2 Preventing Bribery and Corruption

Core42 adopts a zero-tolerance approach to any form of bribery or corruption which is made to obtain or retain Core42 business. Employees must not engage in, encourage, agree to, ignore, assist or be involved in any way with bribery or corruption.

This includes (but is not limited to) any dealings with third parties where the intent is to improperly influence your actions or decisions, or those of the third party, or to reward someone for doing so.

Bribes can take many forms and can involve anything of value, whether material or not, not just money. Examples include, but are not limited to, gifts, cash, entertainment, meals, travel, benefits for family members or friends, and charitable contributions.

Core42 Employees must be familiar with and follow all our policies relating to bribery and corruption (including the [Anti-Bribery and Corruption Policy](#) and [Gifts and Entertainment Policy](#)) and should contact the Ethics and Compliance team if they have any questions or to report any concerns.



Scenario 5 Decision Point, Too Good to be True

You're helping Core42 expand into new markets. A local agent with an impressive record says they can guarantee public contracts in several countries. They ask for a "success commission" that isn't fully documented – and insist on handling all contact with officials themselves.

Sounds like a breakthrough but should you say yes?

Pause and Think:

- Would you know how this agent is winning those deals?
- Is the commission transparent and properly documented?
- Could this expose Core42 to bribery or conflict-of-interest risks?

The Right Call:

This is a red flag. You could be enabling unethical or corrupt conduct. Follow the [Business Partner Due Diligence Policy](#), verify the agent thoroughly, and involve the Ethics & Compliance team before moving forward.

If they resist transparency or oversight – walk away. No deal is worth the risk.

Key Takeaways

- “Too good to be true” deals often are.
- Never allow third parties to interact with officials unchecked.
- Insist on full transparency and documented payments.
- Protect Core42. Put integrity before opportunity.

Dealing With Public Officials:

Public Officials hold positions of public trust and are often subject to strict codes of conduct.

Under UAE law – and in many of the jurisdictions where we operate – penalties for bribery or corruption involving a Public Official are often more severe.

You must therefore exercise extra caution when dealing with Public Officials and seek guidance from the Ethics and Compliance team if you are ever in doubt.

7.3 Anti-Money Laundering Laws

Money laundering refers to any attempt to hide illegally obtained funds or assets and/or bring these funds or assets back into circulation through legal activities. Money laundering is a criminal offence in the UAE and in most jurisdictions where Core42 operates. The laws that prevent this activity are called "anti-money laundering" laws.

Core42 will not accept or process funds that may have been gained through criminal activity, and we will only deal with customers who meet our ethical standards and who are involved in legitimate business activities.

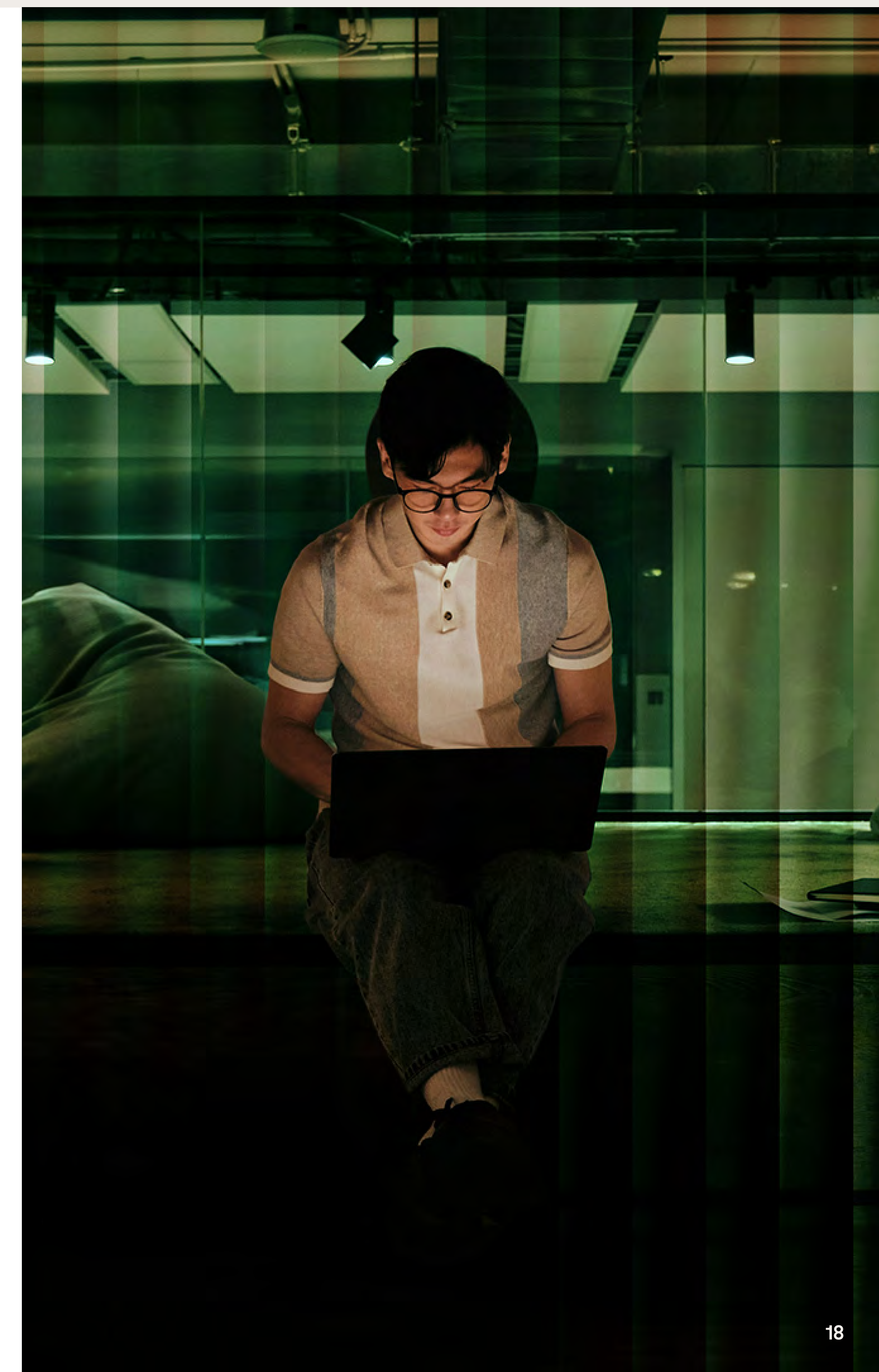
You must take note of any suspicious activities of customers and partners to ensure that neither you nor Core42 is handling the proceeds of criminal activities. You must report any suspected money laundering activity to the Core42 Ethics and Compliance team.

7.4 Labor and Human Rights Laws

We are committed to providing a professional work environment that is free from discrimination and harassment (including sexual harassment).

You must, in compliance with applicable laws and consistent with local laws and customs, not discriminate based on: race; colour; religion; gender; national origin; age; disability; marital status; immigration status; salary level; political affiliation; or any other basis protected by law.

You must comply with the principles of the Ethical Labor Practices Manual, a copy of which is available on MAG.



7.5 International Sanctions and Export Control Laws

Core42 follows all applicable laws and regulations regarding sanctions and export controls. Failure to comply with these laws when engaging in business for or on behalf of Core42 may impact our business, reputation and brand negatively. International trade control laws may apply to goods, products, technology, or services however, where they apply may not always be immediately apparent. You must therefore be cautious, familiarise yourself with our vendor and customer due diligence procedures and seek guidance when in doubt.

As a Company with Business Partners around the globe, we are committed to building purposeful collaborations with them. As such, we are committed to doing business only with reputable customers and partners who we can trust and who adhere to the highest standards of lawful and ethical behaviour.

Employees must comply with the [Sanctions and Export Control Policy](#) and ensure that they follow internal approval procedures before engaging in business transactions with all counterparties.

7.6 Candor and Cooperation with Authorities

We must cooperate fully with appropriate government enquiries and investigations. At the same time, it is important to protect Core42's legal rights regarding its confidential information, as well as the confidential information of third parties held by Core42.

All government inquiries, including requests for information, documents, or investigative interviews – whether in person, by phone, email, or written correspondence – must be promptly referred to the Ethics and Compliance team or the Legal team, who will coordinate the response.



Scenario 6 Bypassing Customer Screening to Close a Deal

An account manager skips required sanctions and compliance checks to speed up onboarding a new customer and close a lucrative deal before quarter-end.

What to Do:

Even if unintentional, bypassing mandatory screening exposes Core42 to serious legal, regulatory, and reputational risk—especially if the customer is later found to be sanctioned, located in a restricted jurisdiction, or is on the BIS Entity List.

If you become aware of this, report it immediately to your line manager or the Ethics and Compliance team at ethicsandcompliance@core42.ai.

Compliance processes must never be sacrificed for commercial speed.

08. Contacts

Ethics and Compliance
Core42, M Level
Twofour54, Yas Creative Hub
Yas Island, Abu Dhabi, UAE

ethicsandcompliance@core42.ai

09. Related Policies and Documents

1. Ethical Labor Practices Manual
2. Quality, the Health, Safety, and Environment (QHSE) Manual
3. Gifts and Entertainment Policy
4. Conflicts of Interest Policy
5. Whistleblowing and Non-Retaliation Policy
6. Disciplinary Policy* (To be finalized)
7. Insider Information Policy
8. Data Protection Policy
9. Social Media Policy
10. Business Partner Due Diligence Policy
11. G42 Environment, Social and Governance Policy
12. Anti-Bribery and Corruption Policy
13. Sanctions and Export Control Policy
14. G42 Business Partner Code of Conduct



10. Definitions and acronyms

Term	Definition
Affiliate	Refers to all the businesses in which Core42 has a Controlling Interest.
AI	Artificial Intelligence.
Business Partner	Includes any party (natural person or legal entity) with whom Core42 engages in business with, remits funds to or receives funds from, excluding customers who receive widely distributed services from the Company.
Code	Refers to the Core42 Code.
Core42 / Company	Refers to Core42 RSC Ltd ("Core42") and its Affiliates.
Core42 Affiliates	Refers to all the businesses in which Core42 has a Controlling Interest.
Core42 Employee(s) / Employee(s)	Refers to all persons who work with and are engaged by Core42, including Employees, directors, independent contractors and international hires.
Controlling Interest	Means the power (whether through ownership of voting shares, partnership interests, by proxy, contract, agency or otherwise), directly or indirectly, to: cast a majority of the maximum number of votes that might be cast at a general meeting; or appoint or remove all or the majority of the board of directors or equivalent governing body; or give direction with respect to the operating and financial policies and/or investment decisions of that person or entity.
ESG	Environmental Social and Governance.
Insider Information	Any material, non-public information about a company or its securities that, if made public, would likely influence an investor's decision to buy, sell, or hold those securities.
Public Official	Means: (a) any officer or employee of any national, regional, local, or other government or any department, agency, or instrumentality; (b) any officer or employee of a company owned or controlled by or performing a function of a government; (c) any officer or employee of a public or state-sponsored university or research organization; (d) any political party, political party official or candidate for public office; (e) any officer or employee of a public international organization (e.g., the World Bank, the United Nations, or the International Monetary Fund); (f) any member of a royal family or member of the military; (g) any individual acting in an official capacity for or on behalf of any of the above categories (whether paid or unpaid); and any individual otherwise categorized as a Public Official under applicable local laws or Core42's policies and procedures.

11. Document Control

Version	Date	Revision Author	Change Summary
1.0	9 November 2025	Ethics, Compliance & Sustainability	Creation of document

Reviews and Approvals

Name	Designation	Role	Date
Emeka Obiora	Vice President - Ethics, Compliance and Sustainability	Approve	22 December 2025
Ergul Hemmingsen	Chief Human Capital Officer	Approve	05 January 2026
Roopal Jobanputra	General Counsel	Approve	13 January 2026
Neha Gupta	Chief Financial Officer	Approve	12 January 2026
Talal Al Kaissi	Chief Executive Officer (Interim)	Approve	26 January 2026
Core42 Technology Projects, LLC	Board of Directors	Approve	09 March 2026