

MAX GULF TECHNOLOGIES LLC

Anti-Bribery and Anti-Corruption Policy

At Max Gulf Technologies LLC, integrity is the foundation upon which every project, partnership, and business relationship is built. This policy defines our company-wide commitment to conducting business free from bribery, corruption, and unethical influence — across all operations, geographies, and third-party relationships. It applies to every individual who acts on our behalf, and it is non-negotiable.

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1. POLICY STATEMENT

Max Gulf Technologies LLC is unconditionally committed to conducting business with the highest standards of honesty, fairness, and ethical conduct. We maintain a zero-tolerance position on bribery and corruption in all its forms — whether direct or indirect, active or passive, domestic or international.

We do not offer, pay, promise, authorize, accept, solicit, or receive bribes of any kind. This applies equally to dealings with private individuals, corporate entities, and public officials at any level of government. No business outcome, commercial advantage, or operational convenience justifies a departure from this standard.

Max Gulf Technologies LLC will comply with all applicable anti-bribery and anti-corruption laws and regulations in the jurisdictions where we operate. We expect the same commitment from every individual, organization, and entity that represents or acts on our behalf.

2. PURPOSE

This policy is designed to fulfil three objectives: to set out clearly and unambiguously the responsibilities of Max Gulf Technologies LLC and all those who work with or for us; to provide practical guidance that enables individuals to identify, assess, and respond appropriately to situations involving potential bribery or corruption; and to protect Max Gulf Technologies LLC, its people, and its stakeholders from the legal, financial, and reputational consequences of corrupt conduct.

This document does not constitute legal advice. Individuals who encounter situations not covered by this policy, or who are uncertain about how it applies, should seek immediate guidance from the Compliance Manager or senior leadership.

3. SCOPE

This policy applies to all personnel of Max Gulf Technologies LLC, including:

- All permanent, fixed-term, temporary, and part-time employees
- Directors, board members, and committee members at any level
- Consultants, contractors, seconded staff, interns, and trainees
- Agency workers, casual staff, and home-based workers
- Agents, sponsors, representatives, and any other individuals acting on behalf of the company

The policy also governs our relationships with third parties. In this context, a third party is any individual or organization with whom Max Gulf Technologies LLC conducts or proposes to conduct

business, including clients, customers, suppliers, subcontractors, distributors, agents, advisers, joint venture partners, government bodies, public officials, and their respective representatives.

All contractual arrangements with third parties shall incorporate provisions that require compliance with the anti-bribery and anti-corruption standards set out in this policy.

4. OUR COMMITMENT TO INTEGRITY

Max Gulf Technologies LLC operates at the forefront of renewable energy, sustainable infrastructure, and advanced network solutions in the UAE and across the region. We work alongside government entities, utilities, data centres, and private enterprises on projects that carry significant public and commercial importance.

The trust placed in us by our clients, partners, investors, and regulators is earned through consistent, transparent, and ethical conduct. Bribery and corruption — in any form — are incompatible with our values, our mission, and our responsibilities as a credible corporate entity. We are committed to building every business relationship on genuine merit, professional excellence, and mutual respect.

We do not distinguish between minor and significant acts of corruption. Any act that compromises the independence, fairness, or integrity of a business decision or public function is unacceptable to us, irrespective of perceived value or local custom.

5. PROHIBITION OF BRIBERY AND CORRUPTION

Definition

Bribery is the offering, giving, promising, requesting, agreeing to receive, or accepting of any financial or other advantage — directly or through a third party — with the intention of inducing or rewarding improper conduct, or influencing a decision to obtain a business, contractual, regulatory, or personal advantage.

Corruption is the abuse of entrusted authority for private gain. It encompasses bribery but also extends to fraud, embezzlement, collusion, abuse of power, and other conduct that undermines institutional integrity.

What Is Strictly Prohibited

No person covered by this policy shall:

- Offer, give, promise, or authorize a bribe to any individual, company, or public official, whether directly or through any intermediary
- Request, receive, agree to receive, or accept a bribe from any person or entity

- Engage in any corrupt, fraudulent, or collusive conduct in connection with the company's operations or any procurement, contract, or public process
- Bribe or attempt to bribe a foreign public official in any jurisdiction
- Use a third party to facilitate bribery on the company's behalf

Bribery is illegal. Violations of this policy may expose the individual and Max Gulf Technologies LLC to criminal prosecution, civil liability, regulatory sanctions, and severe reputational damage. These consequences apply regardless of where the conduct takes place.

6. GIFTS, HOSPITALITY, AND ENTERTAINMENT

Max Gulf Technologies LLC recognizes that the giving and receiving of appropriate gifts and hospitality is a normal part of business culture across many industries and jurisdictions. We permit such gestures only where they are reasonable, proportionate, transparent, and consistent with the following conditions:

- The gift or hospitality is not offered or received with any intention of influencing a business decision, obtaining a commercial advantage, or as a reward for any action taken or omitted
- It is not made in expectation of any return favour or implied reciprocal benefit
- It is offered in the name of the company, not in the personal name of the individual
- It does not take the form of cash, cash equivalents, vouchers, gift cards, or any financial instrument
- It is given or received openly, and disclosed to the Compliance Manager
- Its nature and value are appropriate to the occasion, business relationship, and cultural context
- It does not exceed the monetary threshold established by the Compliance Manager (ordinarily equivalent to USD 100 or its local equivalent)
- It is not offered to, or accepted from, any government official, public representative, regulator, political figure, or political party under any circumstances

All gifts and hospitality — whether given or received — must be declared and recorded. Where a gift cannot reasonably be declined without causing offence in a particular cultural or diplomatic setting, it may be accepted with prior or immediate notification to the Compliance Manager, who will assess the circumstances and determine the appropriate course of action.

Max Gulf Technologies LLC acknowledges cultural variation in business practices across the regions in which we operate. However, cultural norms do not override this policy. When in doubt, individuals must seek guidance before accepting or offering any gift.

7. FACILITATION PAYMENTS

Max Gulf Technologies LLC strictly prohibits facilitation payments — sometimes referred to as expediting or grease payments. Facilitation payments are unofficial payments made to public officials or other individuals to accelerate, secure, or guarantee the performance of a routine governmental action or administrative process to which the payer is already lawfully entitled.

Such payments are a form of bribery. Regardless of how they are framed, described, or locally accepted, they are inconsistent with our values and are prohibited under this policy.

We further prohibit kickbacks — payments or advantages provided to, or received from, a third party as a reward for facilitating, directing, or influencing a business decision in favour of a particular party.

We recognize that, in exceptional and limited circumstances, employees may face situations where declining a payment could create an immediate and credible threat to personal safety or physical security. In such circumstances, individuals should:

- Keep any payment to the absolute minimum necessary
- Request documentation or a receipt, noting the amount and stated reason for the payment
- Create a written contemporaneous record of the incident
- Report the matter to their direct manager and the Compliance Manager at the earliest possible opportunity

Such situations will be treated with discretion and without adverse consequence to the employee, provided the matter is reported promptly and in good faith.

8. POLITICAL AND CHARITABLE CONTRIBUTIONS

Political Contributions

Max Gulf Technologies LLC does not make, offer, or promise any financial or in-kind contribution to any political party, election campaign, political candidate, or politically affiliated organization. Such contributions — however structured — risk creating the perception of an attempt to obtain improper influence or preferential treatment and are therefore prohibited in all circumstances.

Charitable Contributions

Max Gulf Technologies LLC supports responsible and transparent charitable activity. Donations of financial resources, services, knowledge, or time to registered charitable or community organizations are encouraged, subject to the following safeguards:

- All charitable contributions must be approved in advance by the Compliance Manager
- Contributions must be made to legitimate, verifiable, and registered charitable or not-for-profit organizations

- No charitable donation may be used — directly or indirectly — to facilitate, disguise, or conceal an act of bribery or corruption
- All charitable contributions shall be formally recorded and disclosed in accordance with applicable laws

Any charitable activity that creates a conflict of interest, appears designed to generate improper goodwill, or benefits a party with whom the company has a commercial relationship must be escalated to senior management for evaluation before proceeding.

9. THIRD PARTIES, AGENTS, CONSULTANTS, SUPPLIERS, AND BUSINESS PARTNERS

Max Gulf Technologies LLC recognizes that acts of bribery and corruption may be carried out by external parties acting on our behalf. We are therefore committed to ensuring that our third-party relationships are governed by the same standards of integrity that apply to our own conduct.

Prior to engagement, all material third-party relationships — including agents, commercial intermediaries, consultants, subcontractors, and key suppliers — are subject to appropriate due diligence proportionate to the risk presented. This due diligence considers the nature of the services, the jurisdiction involved, the identity of counterparties, and any indicators of potential exposure to bribery or corruption.

Contractual arrangements with such parties shall include explicit anti-bribery and anti-corruption obligations, provisions for audit and monitoring, and the right to terminate in the event of non-compliance.

We will not enter into or continue a relationship with any third party where there are credible grounds to believe that the party has engaged in, or is likely to engage in, corrupt conduct. The use of a third party to circumvent the provisions of this policy is itself a serious violation.

10. CONFLICTS OF INTEREST

A conflict of interest arises when an individual's personal interests, external relationships, or financial arrangements have the potential — or the appearance — to interfere with their ability to act impartially and in the best interests of Max Gulf Technologies LLC.

All personnel are required to identify and disclose any actual, potential, or perceived conflicts of interest to their manager or the Compliance Manager. This includes, but is not limited to, circumstances where a personal relationship, financial interest, or outside business activity intersects with a procurement decision, supplier appointment, project award, or regulatory engagement.

Undisclosed conflicts of interest that result in improper advantage — whether financial or otherwise — will be treated as a serious disciplinary matter. The integrity of our decision-making depends on transparency and the active management of competing interests.

11. BOOKS, RECORDS, AND INTERNAL CONTROLS

Max Gulf Technologies LLC maintains accurate, complete, and transparent financial records across all business activities. Our internal controls are designed to prevent, detect, and respond to any attempt to conceal corrupt conduct within company accounts, records, or reporting systems.

All transactions — including payments, receipts, gifts, hospitality, and charitable contributions — must be accurately recorded with clear documentation of the purpose and parties involved. No transaction shall be made through undisclosed or unrecorded accounts, funds, or arrangements.

Falsification of records, deliberate misclassification of payments, or the creation of off-book accounts for any purpose — including to conceal facilitation payments or unauthorized gifts — constitutes a serious breach of this policy and will be treated accordingly.

Internal controls and financial procedures are subject to periodic review and independent audit to ensure ongoing effectiveness.

12. REPORTING CONCERNS AND WHISTLEBLOWING

Max Gulf Technologies LLC actively encourages every individual covered by this policy to raise concerns about suspected or actual bribery, corruption, or any other conduct that may breach this policy. Early reporting enables the company to act swiftly, protect those affected, and address issues before they escalate.

How to Report

Concerns may be raised through any of the following channels:

- Directly with the individual's line manager or supervisor
- With the Compliance Manager
- With a Director or member of senior leadership

Reports may be made in person, in writing, or through such other channels as the company makes available from time to time. All reports will be treated with discretion and appropriate confidentiality.

If You Are a Victim of Bribery or Corruption

Any individual who is offered a bribe, solicited for a payment, threatened for refusing to participate in corrupt conduct, or who has reasonable grounds to believe that such conduct has occurred or is imminent, must report the matter to the Compliance Manager without delay. Individuals should not attempt to investigate or resolve such matters independently.

13. PROTECTION AGAINST RETALIATION

Max Gulf Technologies LLC is committed to creating an environment where concerns can be raised without fear. Any individual who, in good faith, refuses to participate in a bribe, raises a concern, reports suspected corrupt conduct, or cooperates in an investigation under this policy is entitled to the full protection of the company.

Detrimental treatment of any person who exercises their rights under this policy is strictly prohibited. Retaliation includes, but is not limited to, dismissal, demotion, harassment, exclusion, unfair treatment, or any other adverse action connected to the protected conduct.

Protection extends to individuals whose concerns, upon investigation, are found to be mistaken — provided the report was made honestly and in good faith. No adverse inference will be drawn from a report made in error.

Any individual who believes they have been subjected to detrimental treatment as a result of reporting under this policy should inform the Compliance Manager or a member of senior leadership immediately.

14. INVESTIGATIONS AND DISCIPLINARY ACTION

All reported concerns regarding bribery or corruption will be investigated promptly, thoroughly, and impartially. Investigations will be conducted in confidence, to the extent practicable, and in accordance with applicable legal obligations and internal procedures.

Where an investigation concludes that a breach of this policy has occurred, Max Gulf Technologies LLC will take appropriate action. For employees, this may include disciplinary proceedings up to and including summary dismissal for gross misconduct. For contractors, consultants, agents, or other third parties, the company reserves the right to terminate contractual arrangements with immediate effect.

Where conduct is found to be criminal in nature, the company will consider reporting the matter to the relevant law enforcement or regulatory authorities.

Max Gulf Technologies LLC will cooperate fully with any external investigation, regulatory inquiry, or law enforcement process related to bribery or corruption.

15. TRAINING AND AWARENESS

Max Gulf Technologies LLC is committed to ensuring that all individuals covered by this policy understand their obligations and are equipped to act in accordance with them.

To that end, the company:

- Provides anti-bribery and anti-corruption training to all new employees as part of the induction process
- Delivers periodic refresher training to ensure all personnel remain current with policy requirements and evolving standards
- Requires all personnel to formally acknowledge compliance with this policy on an annual basis
- Communicates its zero-tolerance position clearly and consistently to all suppliers, contractors, agents, and business partners at the commencement of a relationship and as appropriate thereafter
- Provides targeted training and guidance to individuals in roles that carry elevated exposure to bribery risk, including those engaged in procurement, contract management, public sector engagement, or international business development

Training materials and guidance will be reviewed regularly to ensure continued relevance and effectiveness.

16. RESPONSIBILITIES

Senior Leadership and Directors

The Board and senior leadership of Max Gulf Technologies LLC bear ultimate responsibility for the effectiveness of this policy. They are responsible for setting the tone from the top, allocating appropriate resources for implementation, and holding the organization accountable.

Compliance Manager

The Compliance Manager is responsible for overseeing the day-to-day implementation of this policy, providing guidance to employees, maintaining the gifts and hospitality register, receiving and managing disclosures, and coordinating investigations as required.

All Personnel

Every individual covered by this policy is personally responsible for:

- Reading, understanding, and complying with this policy
- Applying sound judgment and seeking guidance when uncertain

- Promptly reporting any suspected or actual breach of this policy
- Cooperating fully with any investigation conducted under this policy
- Completing all required training and annual compliance acknowledgements

Ignorance of this policy's requirements does not constitute a defence in cases of non-compliance. All individuals are expected to familiarize themselves with its contents and to seek clarification where necessary.

17. REVIEW AND GOVERNANCE

This policy is owned by the Compliance Manager and is subject to review on at least an annual basis, or sooner in the event of material changes to applicable law, the company's business operations, risk profile, or regulatory environment.

The Compliance Manager will regularly assess the adequacy and effectiveness of this policy and the internal controls that support it, including through independent internal audits. Recommendations for improvement arising from such reviews will be escalated to senior leadership and implemented without unnecessary delay.

Employees are encouraged to share feedback on this policy, including suggestions for improvement. Feedback should be directed to the Compliance Manager.

This policy does not form part of any employee's contract of employment. Max Gulf Technologies LLC reserves the right to amend this policy at any time in order to maintain its effectiveness and alignment with applicable legal requirements.

18. CLOSING COMMITMENT FROM MAX GULF TECHNOLOGIES LLC

Max Gulf Technologies LLC operates on the principle that sustainable business success and ethical conduct are inseparable. As a company trusted by government entities, utilities, and private enterprises to deliver critical infrastructure across the UAE and the broader region, we take our responsibility to operate with integrity with the utmost seriousness.

We build cleaner infrastructure. We build smarter systems. And we build them on an uncompromising foundation of honesty, transparency, and accountability. This policy represents our public commitment to that standard — to our employees, our clients, our partners, and to the communities we serve.