



Code of Ethics for Suppliers of NTA Company

Introduction

As part of its ongoing operations, NTA Metropolitan Mass Transit System Ltd. (hereinafter: "**NTA**" or the "**Company**") engages with third parties for the purpose of obtaining services (hereinafter: the "**Supplier**").

NTA has established a Code of Ethics and an ethics program for its employees, and it considers it important that the Suppliers with whom it works operate in accordance with the norms, values, principles, and standards observed by the Company, and comply with the applicable legal provisions governing this subject.

A Supplier's engagement with NTA constitutes an undertaking by such Supplier to act in accordance with NTA's values, its Code of Ethics and this Code of Conduct, and to fulfill and comply with all legal provisions applicable to it.

Principles of the Code of Ethics

The Code of Conduct set forth below is derived from NTA's Code of Ethics. Every Supplier entering into an agreement with NTA shall act with integrity, probity, reliability, and professionalism, shall avoid conflicts of interest, and shall assume responsibility for the conduct and behavior of each of its employees, contractors, agents, representatives, and any other person acting for it and/or on its behalf.

This Code of Conduct constitutes a moral compass and a value-based standard governing the terms of engagement between NTA and the Supplier, and does not constitute a substitute for the provisions of the law, the regulations, or the agreement to which the Supplier is a party.

In the event of a question or suspicion regarding unethical conduct in the Supplier-NTA relationship, the Company's Ethics Officer should be contacted by email at ethics@nta.co.il. Reports may also be submitted anonymously.

Supplier Conduct

The Supplier shall report to NTA truthfully and fully regarding its assignments.

The Supplier shall refrain from accepting gifts from NTA employees or giving them gifts, except for gifts of nominal value that are reasonable and customary under the circumstances, such as customary promotional items of nominal value.

The Supplier shall maintain the confidentiality of information provided or made accessible to it by the Company in the course of its work.

The Supplier shall refrain from publicly describing its relationship with NTA, including on social media, unless it has received prior written approval from the authorized authority at NTA (the Legal Department and/or the Public Inquiries Department).

The Supplier shall maintain the cleanliness, proper condition, and integrity of the Company's assets.

The Supplier shall cooperate with NTA's employees, its management, and its other Suppliers, as required.

The Supplier shall act in accordance with the principles of sustainable development and environmental responsibility, and shall minimize, to the extent possible, its adverse impact on the environment.

The Supplier shall comply with all applicable legal provisions when using a vehicle and/or equipment identified with NTA or its operations.

The Supplier shall conduct itself with mutual respect and courtesy and shall refrain from any statement or act constituting harassment of any kind, abuse, or verbal or physical violence, including on the basis of religion, nationality, sex, origin, or sexual orientation.

The Supplier shall maintain appropriate and suitable attire in accordance with its assignments.

The Supplier's Conduct Toward Its Employees, Subcontractors, Contractors, Agents, and Representatives

The Supplier shall provide all persons acting for it or on its behalf with a healthy and safe working environment, in accordance with accepted standards, applicable law, and NTA's guidelines.

The Supplier shall act in accordance with all applicable legal provisions with respect to the employment of employees and/or the procurement of services from contractors, subcontractors, agents, and representatives.

The Supplier shall conduct its dealings with its employees, subcontractors, contractors, agents, and representatives in accordance with the principle of equal opportunity and without discrimination on the basis of religion, age, sex, sexual orientation, or social or political affiliation.

Implementation and Monitoring of the Code of Ethics by the Supplier

The Supplier shall act in accordance with this Code and comply with its provisions.

The Supplier shall ensure that it has, at all times, all the tools and resources necessary to comply with the standards of conduct expected of it.

The Supplier shall carry out communications and take measures to enforce proper conduct among its employees, suppliers, and all persons acting for it or on its behalf.

Monitoring by NTA

From time to time, and at its sole discretion, NTA shall be entitled to examine the Supplier's compliance with the provisions of this Code of Conduct by means of ongoing inspections and audits, whether conducted by NTA itself or by anyone acting on its behalf.

Where required, the Supplier shall provide NTA with any information requested by it in order to enable NTA to examine and verify the Supplier's compliance with and fulfillment of its undertakings as set forth in this document.

In any case in which NTA is of the opinion that the Supplier is not complying with the provisions of this Code, the Company shall be entitled to take measures to ensure such compliance, including termination of its engagement with the Supplier.

Where it deems appropriate, NTA shall conduct surveys among its Suppliers in order to receive their feedback regarding the implementation of NTA's values and the conduct of the personnel within NTA with whom the Suppliers interact.

NTA reserves the right to supplement, update, and/or amend the provisions of this document from time to time. The Supplier undertakes to cooperate fully with NTA, to comply with its instructions, and to adhere to its guidelines as aforesaid.

