

## Anti-Corruption Policy

### 1. Introduction, Purpose, and Definitions

Al Masrya GISI, including all its directly or indirectly owned and/or controlled entities, is committed to complying with Anti-Corruption laws, including but not limited to Egyptian regulations, the Foreign Corrupt Practices Act (US), and the UK Bribery Act (UK). This policy outlines the measures that Al Masrya GISI follows to identify, mitigate, and manage its corruption risks in the jurisdictions where it operates.

This policy establishes actions and procedures required by employees and anyone acting on behalf of Al Masrya GISI to ensure compliance with relevant Anti-Corruption laws and international best practices. This document forms part of the Anti-Corruption Compliance Program, along with the Guideline on the Anti-Corruption Compliance Framework.

Anti-Corruption is generally understood as actions to prevent bribery and corruption. Most countries where Al Masrya GISI operates have laws or are bound by treaties prohibiting bribery and corruption. Anti-Corruption laws prohibit both direct and indirect payments, as well as offers and promises to pay or give anything of value for corrupt purposes to obtain or retain a business advantage.

Bribery and corruption are against our Core Values and our Code of Conduct and are not permitted.

### Definitions

Term	Definition
Anything of Value	Includes cash, cash equivalents (e.g., vouchers), accommodation, travel, tickets to events, gifts, employment offers, scholarships, or donations.
Books and Records	All business records, such as invoices, receipts, financial statements, contracts, and other relevant documentation.
Corruption	The abuse of entrusted power for private or personal gain, including receiving, asking for, or giving anything of value to a government official or third party for corrupt purposes.
Employee	All employees of Al Masrya GISI (including officers, directors, permanent and temporary staff, trainees, and volunteers), regardless of location.
Entertainment	Activities designed to entertain beyond a reasonable business meal, including travel, accommodation, or events.
Facilitation Payment	A small payment to a low-level government official to expedite or ensure routine administrative actions.
Gifts	Cash, services, or anything of value given as a customary show of appreciation.
Donation/Charitable Contribution	Contributions made without expectation of return, often related to corporate social responsibility efforts.

Sponsorship	Contributions made to a third party in return for commercial benefits, such as brand visibility.
Government Official(s)	Includes politicians, employees of governmental bodies, and individuals in state-owned enterprises or international organizations.
Third Party	Any entity or individual not employed by Al Masrya GISI that engages in business activities on its behalf.

## 2. Instructions for All Employees

### 2.1 Expectations and Responsibilities

**All employees are responsible for ensuring that Al Masrya GISI and anyone acting on its behalf comply with Anti-Corruption laws and related standards and procedures.**

Employees should seek advice from the Compliance team if they have any questions or concerns regarding corruption. No employee may engage in or approve any conduct that violates Anti-Corruption laws or this policy.

**The Compliance team** is responsible for overseeing and implementing the Anti-Corruption Compliance Framework, which includes providing standards, procedures, training, and ongoing support.

**Employees in management positions** are accountable for their own actions and the conduct of their staff.

Regularly, Al Masrya GISI will require selected employees to sign a “Compliance Declaration” affirming their adherence to this policy.

### 2.2 The Policy

#### 2.2.1 Compliance Framework

The Guideline on the Anti-Corruption Compliance Framework is designed to address various corruption risks faced by Al Masrya GISI. All entities must implement this framework to protect the company and prevent corruption.

#### 2.2.2 Prohibition of Bribery

Al Masrya GISI prohibits accepting, offering, promising, receiving, giving, or authorizing anyone to give anything of value for corrupt purposes to obtain or retain business. This includes:

- Cash or cash equivalents
- Gifts
- Entertainment, meals, and travel
- Donations or sponsorships
- Business or employment opportunities

Facilitation payments are considered bribery and are strictly prohibited.

### 2.2.3 Gifts, Entertainment, Meals, and Travel

- a. Cash and Cash Equivalents: Not allowed.
- b. Gifts and Entertainment: Permitted only if not intended for corrupt purposes and approved by the Compliance team where required.
- c. Travel Costs: Al Masrya GISI may cover travel costs for third parties, provided they align with company policies.
- d. Employees should not accept travel payments from third parties without managerial approval.

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Required compliance approval (prior): gifts, entertainment and meals\*

Non-government		Government officials
<USD 50	Head of Department	
USD 50 – USD 100	Head of Department	
>USD 100	Board Members	>\$50 Board Members
All	Local internal approval process to be followed	

#### Compliance Team:

**Head of Department:** Each head of department that requires approval.

**Board Members:** CEO, COO, CCO, People and Culture Director.

All approvals must be in writing by email.

\* **Meals and hospitality** are acceptable if reasonable in value and if the cumulative annual value provided to or received from an individual is not excessive (local limits apply; consult your local Compliance team for guidance). Meals must not be lavish or extravagant.

Approval from a Compliance Team Member is required for meals costing USD 100 or more per person.

A practical benchmark is whether you would personally pay for such a meal without company or third-party funding.

### 2.2.4 Interacting with Government Officials

Interactions with government officials must be necessary and for legitimate business purposes. Employees must keep records of such interactions.

### 2.2.5 Donations and Sponsorships

Prior approval from the Compliance team is required for charitable contributions linked to government officials or entities.

### 2.2.6 Discounts and Payments to Government Entities

Prior approval is needed for discounts, rebates, or asset disposals to government entities or officials.

### 2.2.7 Hiring of Government Officials

Approval from the Compliance team is required to offer employment to government employees or their close family members.

### 2.2.8 Mergers, Acquisitions, and Joint Ventures

The Compliance team must be consulted for integrity screening prior to any mergers or acquisitions.

### 2.2.9 Joint Ventures

Al Masrya GISI may be held liable for corrupt activities in joint ventures. Compliance standards must be adhered to.

### 2.2.10 Cash Payments

Cash payments should be avoided to prevent improper conduct. Receipts must be requested for all cash payments.

### 2.2.11 Facilitation Payments

Facilitation payments are strictly prohibited.

### 2.2.12 Written Agreements

All engagements with third parties require a written agreement, including a Standard Compliance Clause.

### 2.2.13 Books and Records

Employees must ensure that all records accurately reflect the nature of transactions.

### 2.2.14 Third Party Engagements

Integrity screenings are required for third parties interacting on behalf of Al Masrya GISI.

### 2.2.15 Interaction with Regulators

All interactions regarding bribery or corruption inquiries must involve the Compliance team.

### 2.2.16 Communication Records

All business-related communications must be documented and made available during inquiries.

### 2.2.17 Consequences of Violations

Violations of Anti-Corruption laws may result in prosecution or disciplinary actions. Employees are not indemnified by Al Masrya GISI for such actions.

### 2.2.18 Reporting Obligations

Employees must report any suspected violations of this policy. No retaliation will be tolerated against individuals who report concerns in good faith.

Al Masrya GISI will not tolerate any dishonest or unlawful actions by employees, whether directly or through third parties. Violations of this Rule may lead to disciplinary action. Employees will not face penalties for refusing to pay bribes, even if it results in business loss. Any retaliatory actions should be reported immediately.

All violations or suspected violations of Anti-Corruption laws or this Rule must be reported to:

- Your manager
- Any member of the board.

Failure to report a violation is itself a violation of this Rule. If uncertain about reporting channels, the Ombuds Function can provide guidance. Retaliation against individuals reporting in good faith is prohibited. Compliance-related inquiries can be directed to the Compliance team by email and/or verbally.

Rule Category	Issue date	Revision Date
Business Ethic Rule	Jan - 2023	April - 2024
Owner	Approver	Al Masrya Function
People & Culture	CEO	Legal & Compliance