



مصر الهندسة النظامية  
Systems Engineering of Egypt

**Code of Business Conduct**

# Table of Contents

<b>1</b>	<b>About this Document .....</b>	<b>4</b>
1.1	Revision History .....	4
<b>2</b>	<b>About SEE .....</b>	<b>5</b>
2.1	Introduction .....	5
2.2	Mission .....	5
2.3	Vision .....	5
2.4	Core Values.....	6
<b>3</b>	<b>Lines of Business .....</b>	<b>6</b>
3.1	SEE IT .....	6
3.1.1	SOLUTIONS.....	6
3.1.2	SERVICES .....	6
3.2	SEE E-Payments .....	6
3.3	SEE Airports .....	7
<b>4</b>	<b>Human Rights &amp; Fair Labor Practices.....</b>	<b>7</b>
4.1	Legal Age Labor.....	7
4.2	Forced Labor.....	7
4.3	Compensation & Working Hours.....	7
4.4	Diversity .....	7
4.5	Harassment.....	8
4.6	Personal Information Protection .....	8
4.7	Employees Protection.....	8
<b>5</b>	<b>Health &amp; Safety.....</b>	<b>9</b>
<b>6</b>	<b>Quality.....</b>	<b>9</b>
<b>7</b>	<b>Data Protection &amp; Disclosure of Confidential Information .....</b>	<b>9</b>
<b>8</b>	<b>Anti-Corruption, Anti-Bribery &amp; Improper Payments .....</b>	<b>10</b>
<b>9</b>	<b>Dealing with Government Entities &amp; Government Officials.....</b>	<b>11</b>
<b>10</b>	<b>Gifts, Entertainment &amp; Favors .....</b>	<b>11</b>
<b>11</b>	<b>Travel &amp; Lodging .....</b>	<b>12</b>

<b>12</b>	<b>Anti-Trust &amp; Competition Laws .....</b>	<b>12</b>
<b>13</b>	<b>Trade Regulation.....</b>	<b>12</b>
<b>14</b>	<b>Money Laundering &amp; Financial Records .....</b>	<b>13</b>
<b>15</b>	<b>Policy, Governance &amp; Compliance Bodies.....</b>	<b>13</b>
15.1	Policy Body.....	13
15.2	Governance Body .....	13
15.3	Compliance Body .....	14
15.4	Roles & Responsibilities for all Employees, Personnel & Resources .....	14
15.5	Roles & Responsibilities for Top Management, Directors & Managers .....	15
<b>16</b>	<b>Environment .....</b>	<b>15</b>
<b>17</b>	<b>Business Continuity Planning.....</b>	<b>15</b>
<b>18</b>	<b>Personnel &amp; Employee Conduct.....</b>	<b>15</b>
<b>19</b>	<b>Conflicts of Interest .....</b>	<b>16</b>
<b>20</b>	<b>Outside Activities, Employment &amp; Directorships.....</b>	<b>16</b>
<b>21</b>	<b>Relationships with Clients &amp; Suppliers .....</b>	<b>16</b>
<b>22</b>	<b>Kickbacks &amp; Secret Commissions.....</b>	<b>17</b>
<b>23</b>	<b>Organization Funds &amp; Other Assets.....</b>	<b>17</b>
<b>24</b>	<b>Organization Records .....</b>	<b>17</b>
<b>25</b>	<b>Dealing with External People &amp; Organizations.....</b>	<b>18</b>
<b>26</b>	<b>Prompt Communications .....</b>	<b>18</b>
<b>27</b>	<b>Privacy &amp; Confidentiality .....</b>	<b>18</b>
<b>28</b>	<b>Commitment to Compliance .....</b>	<b>19</b>
<b>29</b>	<b>Corruption Reporting System &amp; Investigation Process .....</b>	<b>19</b>
<b>30</b>	<b>Annual Policy Review &amp; Process Enhancement.....</b>	<b>20</b>
<b>31</b>	<b>Awareness and Training .....</b>	<b>21</b>
<b>32</b>	<b>Corruption Risk Assessment Handbook .....</b>	<b>21</b>
<b>33</b>	<b>Adding New Suppliers &amp; Third Parties Process.....</b>	<b>22</b>

# 1 About this Document

## 1.1 Revision History

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1.0	25-02-2010
2.0	25-02-2012
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4.0	25-02-2016
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7.3	13-11-2022
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***This document is revised & discussed at least once annually during the “Annual Policy Review & Process Enhancement Meeting” hosted by the Governance Body, along with the Compliance & Policy Bodies & is then updated & modified accordingly upon the updates & modifications being carried out by the Policy Body, the Governance Body reviews & approves the updated version of the document prior to being disseminated to all employees & organization resources.***

## 2 About SEE

### 2.1 Introduction

Systems Engineering of Egypt (SEE), a pioneering force in the Egyptian and MENA IT sector, operates across IT, E-Payments, and Airport solutions. Established in 1984 by industry visionaries, SEE has cultivated a reputation for exceptional service and systems integration. Our commitment to maintaining the highest professional standards in customer support and implementing cutting-edge technologies has driven the transformation of numerous Egyptian entities and organizations over the past three decades.

With the world heading towards a novel era of digitization, SEE offers state of the art integrative solutions through a conglomerate of technology partners, while meeting & surpassing market demands, instigating advancements in a variety of market segments.

Catering to the business ideal of digitalization, SEE has rigorously worked on its vision to stand as one of the leading organizations serving digital transformation as the pinnacle of its ambitions. The company thus stands to mitigate businesses to reach their utmost potential, headlining quality service at the highlight of its drive.

By participating in building the infrastructure of several strategic projects in the Egyptian market, SEE also serves Egypt's 2030 vision with fastidious steps, garnering its stable positioning & reputation by capitalizing its expertise in a diverse range of sectors, mastering an amalgam of technologies centralized around customer satisfaction & remarkable end user experiences.

### 2.2 Mission

As a leading premier provider of Information Technology and data communication solutions in Egypt and the MENA region, SEE consistently introduces, promotes, and implements comprehensive, integrated systems that significantly enhance business operations. Our mission is to create sustainable, innovative, and profitable technology solutions.

### 2.3 Vision

SEE envisions empowering organizations and businesses to achieve their full potential by leading the market with innovative, state-of-the-art integrated solutions across all business lines. We aim to drive a new era of development, growth, and productivity, enhancing customer experiences and fostering industry sustainability.

SEE's Vision is to unlock the full potential of organizations through market leadership in modern, advanced integrated solutions.

## 2.4 Core Values

At SEE, our core values are the guiding principles that shape SEE's daily operations, organizational culture, and business practices across all employees and teams.

At our organization, we are driven by four core values:

- **Speed:** Being competitive in a fast-paced environment.

It goes beyond simply moving quickly. It encompasses a broader set of related concepts, including: (Agility- Efficiency, Responsiveness)

- **Active Engagement:** Promoting collaboration across all teams.
- **Transparency:** Communicating openly and honestly.
- **Accountability:** Taking responsibility for actions and decisions.

## 3 Lines of Business

### 3.1 SEE IT

Offering customized end-to-end, fully-fledged solutions to serve a variety of business needs across a variety of partners, SEE utilizes the latest technological verticals as part of an arsenal that promotes professional expertise & leading industry teams, focusing on customer satisfaction & distinct end user experiences, methodically progressing its IT solution offerings since 1984.

#### 3.1.1 SOLUTIONS

With increasing market demands, complicated IT environments & new technology trends, SEE continues to focus on serving customers with adaptable business solutions, giving way to easier & simpler processes by planning, implementing & monitoring comprehensive systems & solutions.

As one of the leading founders of the IT industry in Egypt & the region, our DNA relies on offering diversified, tailor-made, powerful end-to-end total integrated solutions to serve different business needs through our technology partners across different technology verticals.

#### 3.1.2 SERVICES

Providing a wide range of end-to-end distinguished services through our professional expertise & industry-leading teams, our team of experts maintains mission critical business uptime with an intent focus on customer satisfaction & end user experience. Define setup, manage & maintain KPIs relevant to your business & industry, as our offerings are limitless & serve every practical business need.

### 3.2 SEE E-Payments

Considered as the oldest provider of electronic payment solutions in Egypt, operating since 1989; SEE E-Payments continually develops & supplies state of the art e-payment terminals, peripherals & software applications for m-Commerce, e-Commerce, smart cards & mag-stripe traditional payment applications.

Contributing to almost 50% of all developed electronic payment software solutions in the Egyptian market with more than 200,000 active payment terminals implemented.

### 3.3 SEE Airports

Providing facility infrastructure solutions for the aviation sector through a diversified & rich portfolio of vendors serving Lighting Systems, Luggage Services, Intralogistics Solutions, E-Gates, Digital Display systems & Furniture.

SEE Airport has been operating since 1995 & has expanded its business to serve other sectors such as sports' stadiums, hospitals & offices with a goal for further expansion to cover theatres, educational institutions & conference halls. In addition to priority & utility vehicles solutions such as Fire Trucks, Medical Intervention & Police patrol vehicles.

## 4 Human Rights & Fair Labor Practices

### 4.1 Legal Age Labor

In adherence to the Egyptian Labor Law, the employment of minors is strictly forbidden; Hiring individuals below the legal working age is strictly prohibited

### 4.2 Forced Labor

It is not allowed & strictly forbidden to use any form of forced, bonded or involuntary labor. Employees must be allowed to maintain control over their identification documents (e.g. passports, work permits, military permits or any other personal legal documents). Employees shall not pay fees or make any payment connected to obtaining employment throughout the hiring process & the employment period.

The organization will be responsible for payment of all fees & expenses (e.g. licenses & levies) relating to workers, where legally required. Punishment, mental &/or physical coercion are prohibited.

### 4.3 Compensation & Working Hours

The organization complies with all applicable national laws & mandatory industry standards regarding working hours, overtime, wages & benefits. The organization pays workers in a timely manner & clearly convey the basis on which employees are being paid.

### 4.4 Diversity

The organization promotes an **inclusive work environment** that values the diversity of its employees & **shall not discriminate or tolerate** employees with respect to, but not limited to, gender, race, religion, age, disability, national origin, political direction or any other characteristic protected under law.

**Any breach will be subject to a strict & adequate disciplinary action in accordance & complying with the Work Law of the Arab Republic of Egypt as per the mentioned in our employment contract.**

**Any incident, breach or suspicious incident or even a potential incident should be reported immediately (please refer to article #29).**

## 4.5 Harassment

It is not allowed & strictly forbidden for all employees to practice **any sort of harassment**, including but not limited to, sexual, verbal, bullying, isolation, dismissal, victimizing or conduct themselves in a way that could be construed as such, for example, by using inappropriate language, keeping or posting inappropriate materials in their work area, or accessing inappropriate materials.

**Any breach will be subject to a strict & adequate disciplinary action in accordance with the Work Law of the Arab Republic of Egypt as per the provisions in our employment contract (article #11).**

**Any incident, breach or suspicious incident or even a potential incident should be reported immediately (please refer to article #29).**

## 4.6 Personal Information Protection

The organization **guarantees & ensures** the **confidentiality & secrecy of employees' personal information** as per the mentioned in the employment contract.

The organization also **guarantees & ensures** the **confidentiality & secrecy of the investigations** as well as the **personal information of the reporting party (whistleblower), involved parties & witnesses**.

Having said that; the organization **encouraging** all employees & personnel to **report confidently** any breach, incident or suspicious incident including the ones related to anti-corruption, anti-bribery & non-ethical business **(please refer to article #29 for how to report)**.

## 4.7 Employees Protection

The organization **encourages** all employees & personnel to **report confidently** any action taken against them that can be considered as a form of discrimination, reprisal or disciplinary action **(please refer to article #29 for how to report)**.

The organization **guarantees & ensures** the **rights protection from any form of discrimination, reprisal or disciplinary action & protects employees & personnel** for refusing to participate in any activity that can be assessed as having a significant potential risk that has not yet been reported, mitigated & updated in our Corruption Risk Assessment Handbook. It also **protects the reporting party (whistleblower)** who reports any concerns & reporting made in good faith of attempted, actual or suspected corruption incidents, by monitoring & following up the reactions & counter actions of the participating parties in the investigation.

In case it is proved that there is **any form of discrimination, reprisal or disciplinary action**, an appropriate disciplinary action (according to the severity) will be taken that includes, but not limited to, freeze promotions, demotions, terminations, etc.



## 5 Health & Safety

The organization strives to implement the standards of occupational health & safety at a high level by applying a health & safety management approach appropriate for the business in accordance with the ISO45001 certificate.

The organization complies with applicable occupational health & safety regulations & provides a work environment that is safe & conducive to good health, to preserve the health of employees, safeguard third parties & prevent accidents, injuries & work-related illnesses. This includes regular workplace risk assessments & the implementation of adequate hazard control, precautionary measures & mitigation methods. Employees are to be adequately educated & trained in health & safety issues.

## 6 Quality

The organization strives to implement, maintain & present all its documents in accordance with standard templates & forms that help us to maintain a presentable representation for the organization's work.

The organization also strives to follow sets of good management practices, methods, systems, requirements & specifications established by industry advisory groups to help us achieve & demonstrate consistent delivery & implementation to our customers in accordance with the ISO 9001 certificate.

## 7 Data Protection & Disclosure of Confidential Information

The organization adheres to relevant data protection & security laws as well as to respective regulations, in particular with regard to confidential information of customers, consumers, employees & shareholders. The organization also complies with all said requirements when confidential information is collected, processed, transmitted or used.

The organization also has multiple running Non-Disclosure Agreements with our customers, vendors & suppliers. Employees shall safeguard & make only appropriate use of such confidential information. Employees shall not disclose any information that is not known to the public.

**Confidential Information**, by definition, shall refer to any information furnished & disclosed by the discloser to the recipient & **shall include, but not limited to:**

- Data & information of all types & in whatever form including, but not limited to, verbal, written, graphic, electronic, visual, digital, etc.
- Marketing material, strategies, plans, financial information, projections, sales estimates, prices, business plans, performance results, achievements, profitability figures, customers' or suppliers' lists, operation data, organization structure, etc.
- Customers' designs, layouts, projects' details, concepts, personal information, etc.
- Any other information that should reasonably be recognized & considered as confidential information.

## 8 Anti-Corruption, Anti-Bribery & Improper Payments

The **objective** of this policy (reviewed & approved by the **Governance Body**) is to have a **common ground understanding** of the organization's main goal in doing our day-to-day business across all levels, functions & departments by **tracking & monitoring** the following:

- **Policy Dissemination & Acceptance:** All policies, procedures, code of business conduct, corruption risk assessment, etc. are disseminated by email to all employees & personnel & **shall include a Google form link to sign & accept.**
- **Training & Assessments Completion:** through onboarding & induction trainings for newly hired employees monthly, awareness campaigns for all employees on a quarterly basis, annual online training (generic or vendor specific), annual assessment on COBC & annual assessment on Anti-Corruption Policy.
- **Annual Review Meeting:** All policies, procedures, code of business conduct, corruption risk assessment, corruption KPIs, etc. will be assessed & reviewed **at least annually** in an **"Annual Policy Review & Process Enhancement Meeting"** that will be conducted in Q4 of every year however some or all of the documents might be reviewed prior to that especially if any breach or suspicious incident is reported & investigated positively that needs a further earlier enhancement.

**The above factors are measurable through the Corruption KPIs (please revert to article #31.4).**

**The organization Top Management is committed & pledged towards having zero-tolerance in regards to anti-corruption, anti-bribery & ethical business for the overall organization.**

The organization, including all departments, personnel & employees are committed to doing business with full integrity & the highest anti-corruption standards. All personnel & employees are expected to conduct themselves with honesty, transparency, fairness & follows high ethical standards as well as abide by all international & local anti-corruption/anti-bribery laws & regulations & at all times avoid even the perception of impropriety.

All personnel & employees including the high-risk teams where corruption may occur (**sales, procurement & project management**) shall not (**either directly or indirectly, inbound or outbound**) offer or promise to provide anything of value or make a facilitation payment to directly & improperly influence an official to act or to secure or to obtain an improper advantage in order to obtain or retain business.

**The organization including all departments, personnel & employees are committed to following & complying with all the policies, procedures, standards, rules & regulations regarding the anti-corruption & anti-bribery policies & practices of the Arab Republic of Egypt (as per the mentioned in our Employment Contract) in addition to the ones related to all our suppliers & vendors including the US Foreign Corrupt Practices Act, the UK Bribery Act & other similar anti-corruption laws around the world.**

**In case it is proved that there is/are any non-compliant employee(s) with the anti-corruption policy, an appropriate disciplinary action (according to the severity) will be taken that includes, but not limited to, freeze promotions, demotions, terminations, etc. (please revert to employment contract article #17).**

This policy is being **tracked & monitored** for execution by the relevant & assigned members from the **Compliance Body** to make sure that everything is in place towards achieving the top management commitment. **Any incident, breach or suspicious incident or even a potential incident should be reported immediately (please refer to article #29).**

This policy, which is part of the Code of Business Conduct, **is reviewed & updated** on an annual basis during an **“Annual Policy Review & Process Enhancement Meeting”** by the relevant & assigned members from the **Governance, Compliance & Policy Bodies**.

## 9 Dealing with Government Entities & Government Officials

When dealing with any governmental entity or any government official, employees are responsible for knowing & complying with the rules & regulations of contracting & interaction with this specific party, including but not limited to:

- Must not attempt to obtain, directly or indirectly, from any source, procurement sensitive data that is not publicly available.
- Must ensure the submission of accurate invoices & comply with the laws regarding invoicing & payments.
- Must not pay or promise to pay any amount of money or promise to give any gift or benefit or favor in return for influencing business decisions.

By definition, a **government official** or employee is, but not limited to:

- Any person holding an executive, legislative, judicial or administrative office job for a public sector entity or state-owned enterprise.
- Any public local organization such as political parties or the parliament.
- Any public international organization such as the United Nations or World Bank.
- Any person acting in any official capacity for or on behalf of a governmental body.
- Any political candidate, political party or any officer or employee of a political party.

## 10 Gifts, Entertainment & Favors

The exchange of gifts, entertainment, favors, facilitation payments (**inbound & outbound**) is strictly forbidden & not accepted that could, in any way, influence, or appear to influence, business decisions in favor of any person or organization with whom or with which the organization has, or is likely to have, business relationship.

Similarly, it is also strictly forbidden to accept any other preferential treatment under circumstances such as positioning within the organization that might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

However, the organization sometimes recognizes, that the exchange of gifts with either our customers or our business associates/vendors (especially in industry events, forums, seminars, workshops, tradeshow or new year) that is considered at sometimes an important part of building goodwill & developing/strengthening business relationships as well as being a part of the partner/customer or the partner/business associate/vendor development & engagement activities.

Putting into consideration that **it is not allowed & strictly forbidden** that neither the organization nor its employees **pay any expenses for gifts, entertainment or favors (to, but not limited to, government officials) on behalf of our business associates/vendors** & all those expenses should be covered directly by our organization itself.

The exchange of gifts must be conducted in a proper & appropriate manner while complying with this policy as well as the policies of all our suppliers & vendors regarding this subject & must be approved by the top management. Gifts must also be within the **approved budget limit** set forth in advance **by the top management, which is by maximum equal to \$100 USD**. This budget limit is reviewed annually according to the market value of gifts & economic inflation rates.

## 11 Travel & Lodging

The organization sometimes invite its own customers to attend industry events, forums, seminars, workshops or tradeshow or visit our business associates/vendors' facilities or executive briefing centers or technology excellence centers as part of building goodwill & developing/strengthening business relationships as well as being a part of the partner/customer development & engagement activities. Having said so, it is important to highlight that:

- As a rule, **official invitations** should be sent to customers inviting them to such activities & ask them to **nominate specific assigned names**.
- As a rule, **it is not allowed & strictly forbidden** that neither the organization nor its employees **pay any expenses (to, but not limited to, government officials) related to such activities on behalf of our business associates/vendors** & all those expenses should be covered directly by our organization itself.

However, in some cases, our business associates/vendors fund the expenses (partially or fully) covering travel & lodging for those industry events, forums, seminars, workshops, or tradeshow. In this case, it has to be officially communicated to & approved by our top management.

In both cases, travel & lodging are only restricted to:

- Being a business trip with no unreasonable or non-business-related side trips.
- No friends or family members are getting use or benefit from those expenses.

## 12 Anti-Trust & Competition Laws

Compliance with anti-trust or competition laws is required at all times. Therefore; you must not agree with any competitors to fix or control prices, by either agreeing directly with the competitor or by any other method such as through a third party.

## 13 Trade Regulation

The organization complies with all applicable trade & import regulations including sanctions & embargoes that apply to their activities.

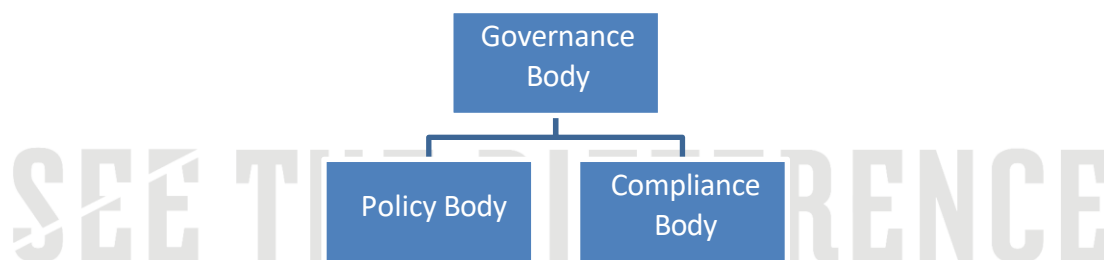
## 14 Money Laundering & Financial Records

The organization complies with applicable laws & regulations of the Arab Republic of Egypt designed to combat money-laundering activities. The organization maintains financial records & reports according to international laws & regulations.

## 15 Policy, Governance & Compliance Bodies

**The organization Top Management is committed & pledged towards having zero-tolerance in regards to anti-corruption, anti-bribery & ethical business for the overall organization.**

The organization has established the **“Policy, Governance & Compliance Bodies”** with the aim to create, establish, update, modify, review, approve, enforce the execution, monitor & audit the compliance of the policies, procedures & standards in order to maintain a healthy business environment which in turn is a **commitment from the top management to having zero-tolerance in regards to anti-corruption, anti-bribery & ethical business** across all the organization personnel & resources.



### 15.1 Policy Body

By definition, the “Policy Body” is a member(s) (selected by the “Governance Body”) given the power and authority to create, establish, update, and modify the policies, procedures, and standards of the overall organization. The “Policy Body” includes the following member(s) and directly reports to the “Governance Body.”

- Member(s) from the Channel & Development Department (Karim Miniesy– Channel & Development Manager)
- Member(s) from the HR Department (Noha Fathy – HR Manager)

### 15.2 Governance Body

By definition, the **“Governance Body”** within the organization is essentially the group of people who hold the authority and responsibility for overseeing the organization's direction, policies, and overall performance.

They also have the ownership & being accountable to **review & approve** the created, established, updated, modified policies (including the anti-corruption policy), procedures & standards by the **“Policy Body”** prior to communicating them with all the organization personnel & resources **at least on annual basis**.

The **“Governance Body”** include the following member(s) & does not share member(s) with the other two bodies (**“Policy Body”** & **“Compliance Body”**).

- Dr. Sameh Nagy (CEO)

The **“Governance Body”** conducts an **“Annual Policy Review & Process Enhancement Meeting”** to review all our policies & procedures with the relevant members from the **“Compliance & Policy Bodies”**, discuss potential updates & modifications needed. Afterwards, the **“Governance Body”** reviews & approves the updated policies & procedures.

### 15.3 Compliance Body

The **“Compliance Body”** by definition, is a/are member(s) (selected by the **“Governance Body”**) given the power & authority to enforce the execution, monitor & audit the compliance of all the organization personnel & resources with the policies, procedures & standards created by the **“Policy Body”**. The **“Compliance Body”** includes the following member(s) & directly reports to the **“Governance Body”**.

- Member(s) from the HR Department (Noha Fathy – HR Manager)

The **“Compliance Body”** will conduct regular monthly meetings to assess, track & monitor the execution & compliance of employees & personnel with our set policies & procedures towards achieving the top management commitment towards zero-tolerance by checking the parameters set in article #8 (Policy Dissemination & Acceptance as well as the Training & Assessment Completion) in addition to discussing if there was any detected or suspected or potential corruption incidents that was not reported for investigation but still require modifications in our **“Corruption Risk Assessment Handbook”**.

This monthly meeting will be changed to a quarterly meeting if it is found that no major edits or modifications are needed on monthly basis for three consecutive months. All those meetings will be summarized & discussed in the **“Policy Review & Process Enhancement Meeting”** that will be held on annual basis (Q4 of every year) with the **“Governance Body”**.

Additionally, the **“Compliance Body”** meets at any point of time for investigation whenever there is a reported incident or breach. If the investigation results are confirmed a case, the **“Compliance Body”** along with the **“Policy Body”** meets for re-evaluation & modification in our **“Corruption Risk Assessment Handbook”**.

### 15.4 Roles & Responsibilities for all Employees, Personnel & Resources

All the organization employees, personnel & resources are committed to comply with all the created & established policies, procedures & standards by the **“Policy Body”** that are reviewed & approved by the **“Governance Body”**.

The commitment is done by accepting all our policies, including the ones related to Anti-Corruption at each time it is disseminated to employees & personnel through a Google form link to click to sign/accept the policies.

## 15.5 Roles & Responsibilities for Top Management, Directors & Managers

All Top Management, Directors & Managers are obliged to maintain & guarantee the implementation of the created & established policies, procedures & standards across their teams.

**The maintaining & guaranteeing is done by monitoring any non-compliant employee. He/she will be subject to a strict & adequate disciplinary action in accordance & complying with the Work Law of the Arab Republic of Egypt as per the terms in our employment contract. It will also affect the evaluation criteria rating outlined in article #31 especially the ones related to the Corruption KPIs.**

## 16 Environment

The organization complies with all applicable environmental laws, regulations & standards as well as insuring the elimination of potential hazards to the environment. We also expect our employees to follow the same regulations & standards.

## 17 Business Continuity Planning

The organization strives to be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases) & to facilitate the resumption of critical operations, functions, and technology in a timely and organized manner to ensure a viable & stable organization. This preparedness especially includes disaster plans to protect both employees as well as the environment as much as possible from the effects of possible disasters that arise within the domain of operations. In doing this, it is critical to ensure the safety & well-being of employees, customers & guests.

The primary objectives of the plan are to:

- Maintain Critical Business Functions (Succession Plan)
- Most critical departments/business functions.
- Ensure employees are able to access an alternate facility
- Protect vital records
- Ensure that they are accessible under all conditions

## 18 Personnel & Employee Conduct

The organization expects its personnel & employees to conduct themselves in a businesslike manner. Drinking, gambling, fighting, swearing & similar unprofessional activities are strictly prohibited while on the job.

**Any breach will be subject to a strict & adequate disciplinary action in accordance & complying with the Work Law of the Arab Republic of Egypt as per the terms in our employment contract.**

## 19 Conflicts of Interest

The organization expects that employees will perform their duties conscientiously, honestly & in accordance with the best interests of the organization. Employees must not use their positions or the knowledge gained because of their positions for private or personal advantage, **internally or externally**. Regardless of the circumstances, if employees' sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with their employer, they should immediately report all the facts. A conflict of interest arises when an individual has a private/personal interest that could appear to influence their decisions.

**Any incident, breach or suspicious incident or even a potential incident should be reported immediately (please refer to article #29).**

## 20 Outside Activities, Employment & Directorships

All employees share a direct & serious responsibility for the organization's good public relations, especially at the community level. Their readiness to help with religious, charitable, educational & social activities brings credit to the organization & is encouraged.

However, employees must avoid acquiring any business interest or participating in any other activity outside the organization that would appear to:

- Create an excessive demand upon their time & attention, thus depriving the organization of their best efforts on the job.
- Create a conflict of interest - an obligation, interest, or distraction - that may interfere with the independent exercise of judgment in the organization's best interest.

It is also important to mention & highlight that the organization does not have & is not involved in any political direction or forced to take part in any political direction. The organization also does not accept or offer political donations.

## 21 Relationships with Clients & Suppliers

Employees should avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with the organization, or that provides goods or services, or both, to the organization if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of the organization.



## 22 Kickbacks & Secret Commissions

Regarding the organization's business activities, employees may not receive payment or compensation of any kind, except as authorized & approved under the organization's business & payroll policies. In particular, the organization strictly prohibits the acceptance of kickbacks & secret commissions from suppliers or others.

## 23 Organization Funds & Other Assets

Employees who have access to organization funds in any form must follow the prescribed procedures for recording, handling & protecting money as detailed in the organization's policies & procedures or other explanatory materials, or both. The organization imposes strict standards to prevent fraud & dishonesty. If employees become aware of any evidence of fraud & dishonesty, they should immediately report it or seek appropriate legal guidance so that the organization can promptly investigate further.

**Any incident, breach or suspicious incident or even a potential incident should be reported immediately (please refer to article #29).**

When an employee's position requires spending organization funds or incurring any reimbursable personal expenses, that individual must use good judgment on the organization's behalf to ensure that good value is received for every expenditure.

Organization funds & all other assets of the organization are purposed for the organization only & not for personal benefit. This includes the personal use of organizational assets, such as computers.

## 24 Organization Records

Accurate & reliable records of many kinds are necessary to meet the organization's legal & financial obligations & to manage the affairs of the organization. The organization's books & records must reflect in an accurate & timely manner all business transactions. The employees responsible for accounting & recordkeeping must fully disclose & record all assets, liabilities, or both & must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports & statements.
- False advertising, deceptive marketing practices, or other misleading representations.

## 25 Dealing with External People & Organizations

Employees must take care to separate their roles from their organizational positions when communicating on matters not involving organizational business. Employees must not use the organization identification, stationery, supplies & equipment for personal or political matters.

When communicating publicly on matters that involve the organization's business, employees must not presume to speak for the organization on any topic, unless they are certain that the views, they express are those of the organization & it is the organization's desire that such views be publicly disseminated.

When dealing with anyone outside the organization, including government officials, employees must take care not to compromise the integrity or damage the reputation of either the organization, or any outside individual, business, or government body.

**It is also important to mention & highlight that the organization does not have & is not involved in any political direction or forced to take part in any political direction. The organization also does not accept or offer political or charitable donations.**

## 26 Prompt Communications

In all matters relevant to customers, suppliers, government authorities, the public & others in the organization, all employees must make every effort to achieve complete, accurate & timely communications - responding promptly & courteously to all proper requests for information & to all complaints.

## 27 Privacy & Confidentiality

When handling financial & personal information about customers or others with whom the organization has dealings, observe the following principles:

- Collect, use & retain only the personal information necessary for the organization's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable & reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

## 28 Commitment to Compliance

The organization, including all departments, personnel, resources & employees, are committed to comply with all our internal policies, procedures & standards as well as all the regulations & rules of the Arab Republic of Egypt including the ones related to **anti-corruption, anti-bribery & ethical business** as per the mentioned in our employment contract.

As mentioned earlier in article #15.2, The **“Governance Body”** representing the top management is **committed & pledged towards having zero-tolerance in regards to anti-corruption, anti-bribery & ethical business** for the overall organization.

**Any breach or non-compliant employee will be subject to a strict & adequate disciplinary action in accordance & complying with the Work Law of the Arab Republic of Egypt as per the mentioned in our employment contract. It will also affect the evaluation criteria rating set forth in article #31.**

## 29 Corruption Reporting System & Investigation Process

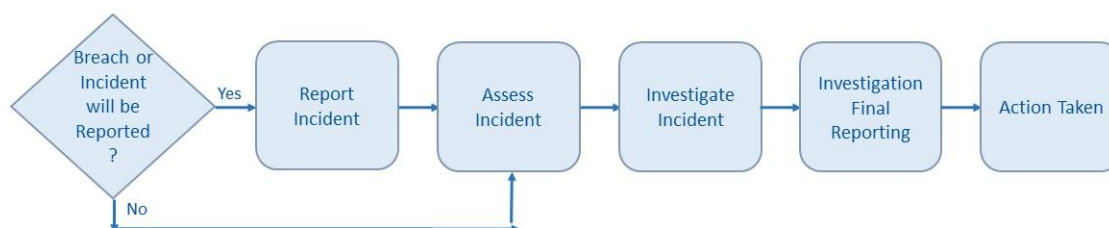
The organization **encourages** all employees & personnel to **report confidently** any breach, incident, or suspicious incident, including those related to anti-corruption, anti-bribery & non-ethical business. Reporting should be done by either **reporting directly to your manager, or to the HR Department, or by anonymous reporting by sending an email to [compliance@seegypt.com](mailto:compliance@seegypt.com), which is monitored by the assigned members of the Compliance Body (please revert to article #15.3) for carrying out the needed investigations.**

The organization **guarantees & ensures** the **confidentiality & secrecy of the investigations** as well as the **personal information of the reporting party (whistleblower).**

The organization **guarantees & ensures** the **protection of rights from any form of discrimination & protects the whistleblower** by monitoring & following up the reactions & counter actions of the participating parties in the investigation.

**All reported breaches or incidents as well as the detected, suspected or potential corruption incidents that were not reported will be assessed & investigated by the “Compliance Body”, where appropriate & applicable.**

Below is an illustrative figure of the process with a description of each phase:



- **Report Incident:** by either reporting directly to your manager, or to the HR Department, or by anonymous reporting by sending an email to [compliance@seegypt.com](mailto:compliance@seegypt.com) that is monitored by the assigned members of the Compliance Body (please revert to article #15.3) for carrying out the needed investigations. The reporting party (whistleblower) must include all details & evidence as much as possible to make it easier & faster for the investigating party to do the needed investigation. There is no specific fixed template to do the reporting.
- **Assess Incident:** all assessments & investigations must be conducted by members not involved in the issue, even if this member is in the investigating committee (Compliance Body). All assessments & investigations are carried out according to the Corruption Risk Assessment Handbook. This step takes a maximum 3 business days.
- **Investigate Incident:** all investigations must be carried out in confidence & confidentiality, including the investigation reports (as per the mentioned above). This step includes the collection of all adequate evidence, listening to the reporting party (whistleblower), listening to involved parties & witnesses as well validating the evidences. This step takes maximum 15 business days.
- **Investigation Final Reporting:** releasing the investigation status & results final report for review & action approval from the investigation committee (Compliance Body) to the HR Director, Governance Body &/or the top management, as appropriate & as needed. This step takes a maximum 5 business days.
- **Action Taken:** an appropriate & adequate action is taken, including but not limited to termination, as well as obtaining any written consents from the guilty party. Provide diligent follow-up with the informant (if known) on the outcome of the investigations & action taken.

**Should there be any confirmed case of corruption related to any of our vendors' deals, it must be reported as well to the relevant vendor respectively.**

**Should there be any confirmed case of corruption, the Corruption Risk Assessment Handbook will be re-evaluated for adequacy, effectiveness & to reflect the needed modifications in regards to objectives, risks, with their mitigation methods.**

## 30 Annual Policy Review & Process Enhancement

The “**Governance Body**” conducts a regular “**Annual Policy Review & Process Enhancement Meeting**” conducted in Q4 of every year with the aim to:

- Review all our policies, procedures & processes (including the Code of Business Conduct & Corruption Risk Assessment Handbook) with the relevant members from the “**Compliance & Policy Bodies**”.
- Discuss the outcome from the regular meetings of the “**Compliance Body**” in regards to corruption events, investigation outcomes, etc.
- Discuss potential enhancements, updates & modifications that needed to enhance the adequacy & effectiveness of our communication, training, awareness, employment process in support to anti-corruption system, all policies, procedures, processes & the whole practice.
- Set deadlines for the modifications & updates to be ready for final review & approval by the “**Governance Body**”.
- Set deadlines for disseminating the modified & updated policies to all employees & personnel with a google form link to sign/accept.
- Any other topic that will arise & will need to be discussed accordingly.

## 31 Awareness & Training

The organization is committed to **providing adequate & appropriate anti-corruption awareness & training for new hires & personnel** joining the organization as part of their **induction & onboarding process** that is conducted **on monthly basis** as well as **providing regular communication & awareness campaigns to existing employees on quarterly basis**.

The training & awareness includes but not limited to all our internal policies, procedures & standards, corruption risk assessment as well as all the articles of this document (Code of Business Conduct). It also includes the anti-corruption policies of our business associates/vendors, where applicable.

The organization is also committed to providing **at least one annual online anti-corruption training** to its employees & personnel, **either a generic training or vendor-specific training**.

Training agenda for onboarding also includes topics related to compensation & benefits, organization chart, facility tour, etc.

## 32 Corruption Risk Assessment Handbook

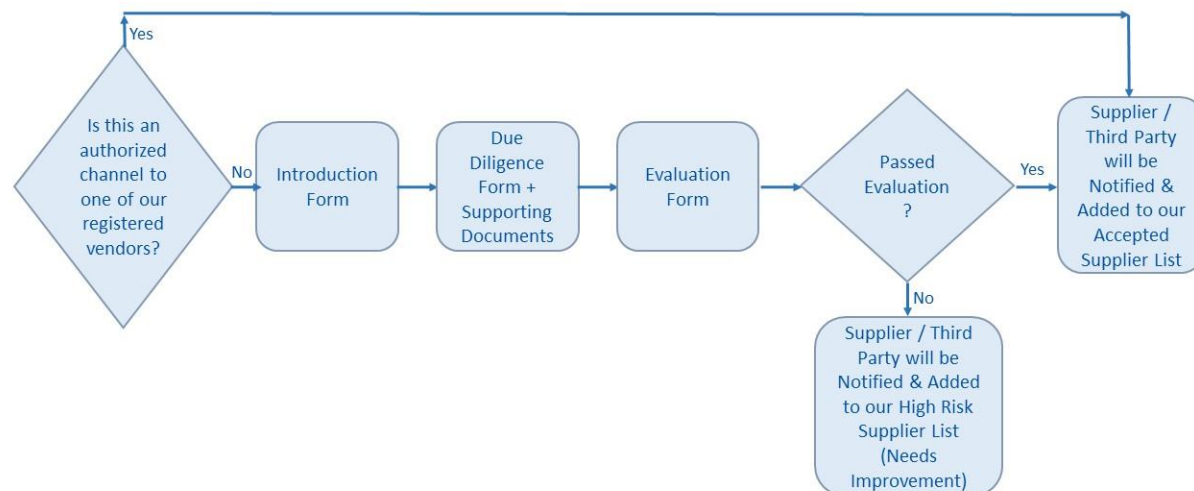
This handbook aims to evaluate & assess risks that are related to corruption, identify where they are likely to have the most significant impacts, direct the organization's resources to mitigate & control such threats, as well as promote ethical business throughout the organization with the aim to comply with the top management commitment towards having zero-tolerance in regards to anti-corruption & anti-bribery for the overall organization

**This document will also be evaluated, revised & modified at least annually (as part of the Annual Policy Review & Process Enhancement Meeting) as well as whenever needed earlier in case there are confirmed cases of breach or corruption investigations or even any detected, suspected or potential corruption incidents that were not reported & need to be reflected in this document & hence will be representing more accurate rating for the likelihood & severity of incidents as well as enhancing the control & mitigation methods. This document must also be reviewed if any significant change to the transactions/activities or structure of the business happens within the organization.**

It is important to highlight that the rating regarding the likelihood & severity of incidents is based on assumptions due to the fact that all previous historical incidents that might have occurred in the past were not recorded nor documented.

### 33 Adding New Suppliers & Third Parties Process

Adding & registering new suppliers & third parties is the sole responsibility of the Procurement & Logistics Department by following the process in the below illustrative figure.



At each time, this supplier/third party is assigned a job to deliver (delivery of goods or professional services), an official PO is issued mentioning all the needed details along with terms & conditions that includes articles related to anti-corruption, anti-bribery & doing ethical business as well as following all the rules & regulations of the Arab Republic of Egypt.

Upon completion of the service required, a re-evaluation is done to the supplier/third party to assess the eligibility to complete in the accepted supplier list or moving to the high-risk supplier list that needs improvement.

**It is important to note that this whole process is not a newly created one from scratch however it is newly combined in one consolidated practice with some modifications & enhancements that took place & is executed Since Q1 2023.**