

**EGYTRAFO Group**

**Code of Ethics and  
Conduct**

Maintaining the Highest Ethical  
Standards

## *A Message from Our Group Chairman*



*For many years, EGYTRAFO Group has been demonstrating a deep commitment to business integrity. Integrity is at the core of who we are. It's one of our foundational values and a crucial factor in establishing the trust that underlies our relationships with customers, suppliers, community and other business entities. For us, to be successful in our industry, we must make sure that EGYTRAFO brand is synonymous with trust, integrity, quality and the highest ethical standards.*

*We recently have decided to work on writing a clear ethics charter that will become a benchmark for everyone on issues of group or individual behavior and action. This does not mean that the Group is now discovering the need to act ethically in its businesses; rather, the Group is again formalizing and re-affirming principles that are already well known and respected within its organization, and applying them in a broader framework.*

*Each of us is accountable for living up to these high standards every day, in all our actions. In a complex business environment, however, it is not always obvious what the right course of action is. That's why we have EGYTRAFO Code of Ethics and Conduct as a resource on ethical business practices. It is a guide for navigating the kinds of business situations we confront every day and arming us with the tools we need to make good decisions as we do our jobs.*

*I urge you to review the Code thoroughly. Of course, no one document can cover every situation that will arise in the course of your job. Therefore, you can and should take up any questions or concerns with your department manager and the HR Department. I hope that everyone will fully respect the ethical principles that this Code reaffirms.*

**Eng. Atef Abd El- Moniem**

**Group Chairman**

# We Act Ethically in Business

**EGYTRAFO is highly committed to the ethical standards and we ensure its compliance. Any unethical acts are unacceptable**

**Our Code of Conduct is highly communicated with all employees in all levels to which each and every one is highly committed to it**

# EGYTRAFO Core Values

## Caring

*The Company cares about people: EGYTRAFO people, customers, suppliers, distributors and community. We are committed to act with compassion, integrity, honesty and high ethics in all situations, to listen with respect to others and to value differences. The Company is also committed to protect the global environment, to enhance the communities where EGYTRAFO people live and work, and to be compliant with all government laws and regulations.*

## Maintaining Customer Satisfaction and loyalty

*Customer satisfaction and loyalty are gained by clearly identified factors: availability, imagination, innovation, continuous improvement of quality and of traceability.*

## On Time Delivery with Assured Quality

*We are committed to deliver products on time, with the highest quality required.*

## Teamwork

*All EGYTRAFO people are team, committed to work together. Only by sharing ideas, technologies and talents can the Company achieve and sustain profitable growth.*

## Team Commitment

*Create a commitment to common goals; resolve conflict in a positive way.*

## Pro-activity

*In a Dynamic Environment, we think proactively rather than reactively. We Lead others and take the Initiative.*

## Creativity

*We promote creativity in addition to free and out of the box thinking and new ideas.*

# Table of Contents

Our Relationship with Each Other .....	7
Our Relationship with Our Company .....	9
Our Relationship with Other Business Entities. ....	14
<i>Suppliers</i> .....	14
<i>Customers</i> .....	15
<i>Competitors</i> .....	15
Our Relationship with the Government and the law .....	17
<i>The Government</i> .....	17
<i>Political Contributions</i> .....	17
<i>Importing and Exporting</i> .....	18
Our Relationship with Our Society .....	19
<i>Global Business</i> .....	19
<i>Inhumane Labor Practices</i> .....	19
<i>EGYTRAFO commitments to Human Rights</i> .....	19
Our Relationship with Our Environment .....	20
Responsibility for Compliance .....	21
FREQUENTLY ASKED QUESTIONS.....	23
Non-Retaliation Policy .....	24

# About the Code of Ethics and Conduct

Our Code of Ethics and Conduct reflects our daily typical dealings and interactions. It highlights our standard behavior and our corporate values. The code conveys that, the manners of achieving a goal are as importance as achieving them. This code is applied to all EGYTRAFO people, including directors.

It is the employee's responsibility to demonstrate and reflect this code by complying with the company policies and all the applicable laws. By fully including ethics and integrity in our ongoing business relationships and decision-making, we demonstrate a commitment to a culture that promotes the highest ethical standards.

It is easy to comply with the code by seeking guidance when questions arise. Each employee is responsible for our company compliances with the code. If you are uncertain, before you proceed with a specific action, ask yourself the following:

- Is this under my authorization to do it?
- Is my action the right thing to do?
- Is this action legal and applicable to the company policies and values?
- Would I be proud to report this action to my manager?
- Is this action supports EGYTRAFO ethical code?
- Am I representing the highest ethical standards?

If any question answer is NO, or if you need any illustration and guide about EGYTRAFO standards you should discuss it with your manager or the HR Department.

EGYTRAFO assures that all complains will be confidential. No adverse action will be taken against anyone who is complaining, reporting or assisting in the investigation of a suspected violation of the Code of Ethics and Conduct, unless the information provided is found false.

The Code is available online. EGYTRAFO requires from its people to read, understand and comply with the code.

# Our Relationship with Each Other

*EGYTRAFO respects diversity and privacy and considers the qualifications of its employees above all else; discrimination of any kind is prohibited. We are responsible for treating each other with respect and dignity.*

We as a team in the company should create a climate of harmony and trust under the umbrella of policies, regulations and laws. Our commitment with the code will help in maintaining high standards of ethics in everyday dealings.

Your relationship with your supervisors should show a perfect example of decency, fairness and integrity. You are responsible with them in achieving the goals and in ensuring communication between you is open and honest. As a leader, you are responsible for clearly defining standards of performance and creating an environment that promotes teamwork and ethical behavior. You should encourage innovative and creative thinking. As a supervisor, you should support your subordinates with the freedom necessary to do their jobs.

EGYTRAFO is committed to provide a safe and healthy workplace for all employees. As part of this commitment, all facilities must comply with workplace safety laws. Employees are expected to perform their duties in a safe manner at all times, including wearing the appropriate gear, operating machinery only according to instructions, and taking appropriate action when a safety hazard arises.

## *Do What's Right!*

- Follow the safety guidelines in place at each of our locations.
  - You are accountable for maintaining an environment free of safety risks or health hazards.
- When a risk or an unexpected danger emerges, act quickly and safely to get it under control and seek help right away.

- It is the policy, practice and desire of EGYTRAFO to provide employment opportunities to all qualified persons on an equal basis.
- We do not use child labor. Child labor is defined as employing any person younger than the minimum age allowed by law.
- We provide training, education and promotional opportunities that permit development and career advancement for all EGYTRAFO people.
- We conduct performance appraisals that provide candid and accurate feedback. This process encourages two-way comments and discussion.
- We prohibit any kind of harassment and any act that could be perceived as violent or threatening.

**Q:** *One of my co-workers e-mailed an inappropriate joke to me and some other colleagues. I found it offensive, but don't know if I should approach my co-worker with my concern.*

**A:** *At EGYTRAFO, we are committed to maintaining a professional work environment in which all EGYTRAFO people are treated with respect and dignity. Therefore, offensive or inappropriate behavior is not acceptable. If you feel uncomfortable speaking with your co-worker directly, please contact your Manager or Human Resources for assistance.*

As part of their employment with EGYTRAFO, employees may provide certain personal information to the Company, such as home and e-mail addresses, family information for benefits purposes, and other personal information. We use such information only for the reasons it was supplied to us as necessary for business purposes and consistent with local laws.



# Our Relationship with Our Company

*We, as EGYTRAFO employees, must adhere to the company policies, laws and regulations. We must preserve all the company private information. Moreover, we should all work to improve the company performance in a way full of integrity and honesty.*

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Our judgment is one of our most valuable assets. We should avoid any activity, interest or association that conflicts with the Company's best interests. Conflicts can arise in many situations. It will not always be easy to distinguish between proper and improper activity. When in doubt, consult your manager or Human Resource Department.

Activities that may harm the company are hard to be mentioned all, but here are some highlighted actions that may affect the company in negative ways:

- Do not work for a competitor of EGYTRAFO's while working for EGYTRAFO or do any work for or provide assistance to any third party (customer or supplier) that may affect your performance or judgment on the job.
- Do not use Company time, facilities, and materials, resources (PCs, printers, internet, fax, photo copies machines) brands or logos for outside work that is not related to your job at EGYTRAFO.

**Q:** *I recently obtained my manager's approval to join night voluntary work in a non-profit organization. May I use my desk phone to contact my voluntary group members or use the copy machine to make copies of information during work hours?*

**A:** *No. Your intended use of Company property is strictly for your personal benefit, is not related to the conduct of Company business, and may be perceived as interfering with your ability to perform your work-related responsibilities. While intermittent personal use of Company property is permitted, it must be limited and not interfere with the performance of your work-related responsibilities.*

- Notify your manager and obtain an approval from the top management before doing business on EGYTRAFO behalf with any company in which you or a close family member has an interest such that you may in any way benefit from your or their actions.
- EGYTRAFO respects the rights of its people to freely associate with those they encounter in the work environment, but it must also be ensured that those relationships do not negatively impact job performance, the ability to supervise others or the work environment.
- In any work place, friendship between employees may arise. Favoritism or making business decisions based on friendships rather than the best interests of the Company is prohibited



## **WE PROTECT EGYTRAFO CONFIDENTIAL INFORMATION**

EGYTRAFO manufacturing secrets and other confidential information may consist of any formula, design, device or information that is used in our business and that gives EGYTRAFO an opportunity to obtain an advantage over our competitors. EGYTRAFO manufacturing secrets and other confidential information are not always of a technical nature. They can also include business research, new product plans, strategic objectives, any type of marketing or sales material or information, any unpublished financial or pricing information, employee, customer and vendor lists, and information regarding customer requirements, preferences, business habits and plans. While not complete, this list suggests the wide variety of information that needs to be safeguarded. Trade secrets and other confidential information need not be patentable, but cannot be publicly known.

### *Do What's Right!* ✓

- Never share non-public information with someone who doesn't have a business need to know it and isn't authorized to have it.
- Prevent accidental disclosure by keeping your devices password-protected and safely securing any sensitive files in a locked drawer or cabinet.

If you leave EGYTRAFO, your obligation to protect the manufacturing secrets or any confidential information continues until the information becomes publicly available or no longer considered confidential. You should also remember that correspondence, printed matter, electronic information, documents or records of any kind, specific process knowledge, procedures, special EGYTRAFO ways of doing things — whether confidential or not — are all the property of the Company and must remain at EGYTRAFO. Of course, personal skills acquired or improved on the job are the personal assets of the person who leaves.





## WE MAINTAIN RELIABLE FINANCIAL RECORDS AND REPORTS

The financial position of our Company and the results of its operations must be recorded in accordance with the requirements of the law. Company policy, as well as the law, requires EGYTRAFO to maintain books, records and accounts that accurately and fairly reflect the nature of the business transactions and the disposition of assets of the Company.

The integrity of the Company's accounting and financial records is based on the accuracy and completeness of the basic information supporting entries to the Company's books and accounts. Everyone involved in creating, processing and recording such information is held responsible for its integrity. Every accounting or financial entry should reflect exactly what is described by the supporting information. There must be no concealment of information from (or by) management, or from the Company's internal or independent auditors.

No payment on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment. No false or misleading entries should be made in any books or records of the Company for any reason, and no fund, asset or account of the Company may be established, acquired or maintained for any purpose unless such fund, asset or account is properly reflected in the books and records of the Company. No corporate funds or assets should be used for any unlawful or improper purpose.

Managers and others responsible for the preparation of financial information should ensure that EGYTRAFO financial policies are followed. Revenue and expenses should be properly recognized on a timely basis.

**Q:** *What do I do if I am asked to delay accruing certain expenses until the next period? For example, if someone explains to me that "as long as we get them recorded this fiscal year, we are not doing anything wrong," is that true?*

**A:** *No, delaying the accrual of expenses would be a misleading, unacceptable and possibly unlawful practice. Every business and financial transaction, however immaterial, must be reported accurately and honestly. Falsification of any Company document or record is a serious offense and could result in termination of employment.*



## WE PROTECT EGYTRAFO'S ASSETS

EGYTRAFO assets, equipments, system and facilities must be used for proper and authorized purposes. Any theft or misuse is totally prohibited. They must use for conducting EGYTRAFO business or for purposes authorized by management. You are personally responsible not only for protecting EGYTRAFO property entrusted to you, but also for helping to protect the Company's assets in general.

### *Do What's Right!*



-You should be alert to any situations or incidents that could lead to the loss, misuse or theft of Company property and you must report all such situations to your manager or the HR Department as soon as they come to your attention.

### *Information Technology and Social Media Usage*



EGYTRAFO's Information Technology Resources include all current and future equipment, software and services that gather, store, communicate and process data that is owned, or provided by EGYTRAFO.

EGYTRAFO's Information Technology Resources, as well as Social Media, should be used in a respectful, professional manner for EGYTRAFO business purposes. We must use EGYTRAFO's Information Technology Resources and Social Media responsibly and in a manner consistent with the Code. The following uses are prohibited:

- To send harassing, discriminating, offensive, or threatening messages.
- Unauthorized distribution of EGYTRAFO confidential information or unauthorized discussions of Company business or internal processes on any external site.
- To reveal your user ID or password to others or to allow others to use your user ID or password.

The Company has the right to monitor, access and review all Company Information Technology Resources extends to business as well as personal information created, stored or transmitted using Company Information Technology Resources, and also includes Social Media sites visited via Company Information Technology Resources. Employees should have no expectation of privacy with respect to such business or personal information.

EGYTRAFO reserves the right to restrict or terminate any user's access to or use of EGYTRAFO's Information Technology Resources at any time, for any reason, with or without advance notice.

**Q:** *I often visit facebook when relaxing at home, and last week, I noticed comments from a former employee describing his experience with our Company in a very negative manner. This upset me very much. May I respond to these comments?*

**A:** *You may not respond to comments on behalf of the Company. However, you are free to respond on a personal basis, as long as you are not violating the Company's guidelines on using Information Technology Resources and Social Media and are not disclosing the Company's confidential or proprietary information. You are also strongly encouraged to bring this matter to the attention of your manager or Human Resources.*

**Q:** *My daughter recently asked if she and a friend can use my computer while I am out. Is it okay to give them my log-on and password?*

**A:** *No. Log-ons and passwords help to keep our Information Technology Resources secure. You should not disclose this information to anyone. In addition, you can better protect company data from unauthorized users by changing your passwords periodically. Moreover; family members should not use your company laptop for personal use.*

# Our Relationship with Other Business Entities.

*EGYTRAFO image is our responsibility. How others perceive our company is depending on how we deal in an honest and transparent way. It is important to maintain our ethical values in our dealings with others .In addition; we should respect and adhere to customer or supplier policies to the extent that they don't contradict our own policies.*

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## Suppliers

We view our suppliers as partners. Decisions are based on objective criteria such as price and quality, as well as a vendor's reliability and integrity. Giving or receiving any kickbacks, bribes or similar payments of any sort is prohibited.

Moreover, EGYTRAFO suppliers and vendors should always be advised of the requirement to adhere to the Code when working with us or face the possibility of losing our business for failure to do so. It is unacceptable to give or receive gifts, payments or other personal benefits to influence or that may appear to influence, any business decision. However, items that are insignificant, small, incidental, and have no market value, such as logoed promotional items (e.g., pens or paper provided at meetings; product samples; publications; etc.) are reasonably permitted.

### *Do What's Right!*

- Never accept a gift or service if it will compromise you or could appear to compromise you.
- Make product quality and safety your personal responsibility. We act and think like owners.

Employees are generally prohibited from giving gifts of any value to a business partner. Exceptions must be approved in advance by a responsible manager under the umbrella of EGYTRAFO policies. The gift given also should be in compliance with gifts policies established by the receiving party.

## Customers

We strive to consistently deliver products that meet customers' expectations and our own high standards and seek continuous improvement and innovation in our operations to meet those standards. We treat all customers on the same business basis. No personal favoritism is accepted in either price or quality. All customers are equal for us in receiving the best quality with the best price. We are committed to ensuring that customers can trust EGYTRAFO products for their reliability, quality and outstanding performance. Our reputation has been built upon the quality and safety of our products. Our commitment to quality and safety is essential to the continued growth and success of our Company.

We provide professional, well trained after-sale technical support for customers. They follow and help customers and answer any questions arise after purchasing our product. When a customer expresses dissatisfaction, we address the problem promptly, courteously and fairly, and make every reasonable effort to sustain or regain the customer's goodwill and trust in our products.

## Competitors

Our company respects the rules of the free market. Accordingly, we comply with the rules of competition and with those of regulated markets by behaving honestly and prohibiting defamation or denigration of competitors.

### *Do What's Right!*

- Follow all applicable competition laws.
- Do not enter into any agreement or understanding with any competitor regarding price.
- Do not discuss with any competitor our Company or such competitor's past, present or future prices, markets promotional, programs or sales items.



## **WE RESPECT THE SECRETS AND CONFIDENTIAL INFORMATION OF OTHERS**

Our Company policy is to respect the trade secrets or other proprietary information of others. This is particularly important if you have knowledge of trade secrets and proprietary information of a former employer. We use only legal and honest means for collecting information useful for entering into markets or contracts.

**Q:** *I recently left a competitor company and joined EGYTRAFO. I thought it might be helpful to my new team for me to draft a summary document outlining everything I can recall about my former employer's business plans and strategies. Is this the right thing to do?*

**A:** *It would be highly unethical, and possibly unlawful, for you to share the confidential or proprietary information of your former employer. You should not reveal any non-public information you were privy to while working for a competitor, and if you are ever asked to do so, you should immediately report the situation to either the next level of management or Human Resources Department*



# Our Relationship with the Government and the law

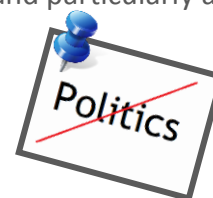
*We obey all laws that regulate EGYTRAFO's business. It is our policy to go beyond the letter of the law and comply with its spirit.*

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## The Government

We have a zero tolerance anti-corruption policy and employees must never offer, give or accept bribes to get business done. We are strictly prohibited from directly or indirectly giving, offering, promising, or authorizing anything of value – no matter how small – to any government official or agency (including a national or local government official or employee, a political candidate, or an official or employee of government-owned or controlled entity) or any other individual to corruptly secure a business advantage, influence business or governmental decision making in connection with any of our activities, or otherwise induce the recipient to abuse his or her power or official position.

Always be direct and honest in dealings and communications with government employees. Any knowing or willful false statements to government employees (oral or written), and particularly any false statement, can expose the Company and its people to substantial penalties.



## Political Contributions

We do not make any political contribution. No funds or assets of the Company may be used for contributions to any political party or candidate. The Company is prohibited from compensating any EGYTRAFO person or individual associated with the Company (including outside Entities), directly or indirectly, in any form, for political contributions that the person intends to make or has made.

Individual EGYTRAFO people remain free to make personal contributions to candidates or parties of their choice. A personal contribution is the responsibility and burden of the individual person. EGYTRAFO will accept no responsibility for or obligation with respect to a personal contribution. Further, a personal contribution shall not be made with the intention of assisting EGYTRAFO in obtaining or retaining business.

### *Importing and Exporting*

We comply with international trading regulations in conducting both domestic and overseas operations; the Company fully complies with all applicable laws governing imports, exports and the conduct of business with non-Egyptian entities.

EGYTRAFO people must conduct Company activities so as to fully comply with the laws of the countries in which they operate. However, there may be a time when there is a conflict between the laws of one country and those of Egypt or Company policy. Should you become aware of such a conflict, you should notify your manager.

# Our Relationship with Our Society

*EGYTRAFO keens to support and participate in the society activities and development. We respect each item that protects human rights, health and education.*

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## Global Business

Our Company sells its products in many other countries. It is our policy to work cooperatively with local and national governments. From time to time, issues may arise that affect our operations. After careful consideration, the Company will offer opinions and recommendations to governments on particular issues to support our business goals and needs.

## Inhumane Labor Practices

EGYTRAFO opposes the illegal use of child labor, the exploitation of children, and all other forms of unacceptable treatment of workers. Moreover, it is our policy not to work with any supplier known to operate with unacceptable worker treatment, such as the exploitation of children, physical punishment, female abuse or other forms of abuse. No abuse of child or other labor laws is acceptable to the Company, and if any violation of our principles becomes known to the Company, it is grounds for immediately terminating the business relationship.



human rights

## EGYTRAFO commitments to Human Rights

Our company is committed to respect human rights and cooperate with entities that respect them and we together must promote the following standards:

- Equal opportunity for all employees at all levels regardless of race, religion, sex, gender identity, age, disability, marital status, or any other characteristic protected by law in any of the terms or conditions of employment.
- Safe and healthy workplace, which protects the human health and the environment.
- Paying employees a wage that enables them to meet at least their basic needs, and provides employees the opportunity to improve their skills and capabilities.
- Do business that improves the educational, cultural, economic and social well-being in the community.

# Our Relationship with Our Environment

*We deeply care about the environment. Our concern about doing our part to protect our planet focuses on operating in a manner that is safe for the environment and that protects our world for future generations.*

EGYTRAFO and all its employees are committed to protect the environment. No one is allowed to conduct any action or approve any operation that is against the environment protection laws and regulations. We are vigilant in preventing accidents, spills, and any other potential threats to the health and safety of our community and our planet.

The company makes use of methods and techniques that are most likely to promote sustainable development. It encourages research and innovation to develop know-how in the area of quality and safety, materials recovery and recycling, saving natural resources, reducing nuisances and protecting biodiversity.

## *Do What's Right!* ✓

- Make sustainability a personal goal: conserve electricity, recycle resources, and be conscious of your individual impact on the environment.
- Report any environmental health and safety hazards right away; spills, leak, and other potentially dangerous situations can't wait.
- Ensure suppliers and other business entities are committed to following environmental regulations



# Responsibility for Compliance

*Having a written code of conduct is not enough – the standards of conduct must be communicated to and complied with by those who are asked to follow them.*

In accepting employment with EGYTRAFO, each of us becomes accountable for compliance with these standards of conduct, with all laws and regulations. Moreover, everyone is committed to the company ethics that respects values. Managers are responsible for communicating these standards to those they work with, ensuring that they understand and abide by them, and creating a climate in which people can discuss ethical and legal issues freely.

We encourage you to contact the HR Department to ask questions about, or to report any suspected violations of, the Code of Ethics and Conduct. We take your concerns seriously and all reported violations will be promptly investigated. The management along with the HR Manager and the respective Head of the Department would have the right to call in for questioning for any and all violation of any of the Code of Ethics and Conduct.

It is imperative that reporting persons do not conduct their own investigations, as investigations may involve complex legal issues. Acting on your own may compromise the integrity of an investigation and adversely affect both EGYTRAFO and you. The major decision making power would be with the HR Manager and Head of the Department; only in matters of grave severity would it be escalated to the management.

EGYTRAFO people who violate the Code may be subject to disciplinary actions. The following acts below mentioned would also come under the ambit of violation of the Code:

1. Stopping work before time.
2. Constant late attendance.
3. Excessive absenteeism.
4. Offensive/abusive conduct and/or language.



5. Irresponsible handling of EGYTRAFO property.
6. Personal use of EGYTRAFO property without permission.
7. False expense claim.
8. Smoking in the prohibited area of the EGYTRAFO premises.
9. Accessing obscene sites on the Internet.
10. Violence and harassment to other employees.
11. Disturbing / distracting other employees.
12. Falsification of company records.
13. Theft of company property.
14. Intentional destruction of company property.
15. Intentional violation of company rules. Unauthorized possession of firearms or weapons.
16. Disclosing confidential / financial information to outsider.
17. Being under the influence of drugs, alcohol or narcotics while on duty.
18. Taking or giving bribes.
19. Arising arguments based on politics, religion or any personal believes. Personal concerns are forbidden to be involved in the company workflow or affect it under any mean or attitude.

## Conclusion

It is not possible to describe all unethical or illegal business practices in detail. The best guidelines are individual conscience, common sense and unwavering compliance with all company policies, applicable laws, regulations and contractual obligations. Seek guidance if you are unsure of what to do, ask questions and report wrongdoing. Company policy strictly forbids any retaliation against an employee who reports suspected wrongdoing.



## FREQUENTLY ASKED QUESTIONS

**Q: Where can I find EGYTRAFO Code of Ethics and Conduct?**

A: You can find it on [www.egytrafo.com](http://www.egytrafo.com). If you don't have Internet access, you can obtain a copy from the HR Department.

**Q: How do I know what standards apply in the workplace?**

A: EGYTRAFO complies with all laws and regulations everywhere we operate. You have to make sure to ask your manager or the HR Department, if you don't find the answer you're looking for.

**Q: To whom does this Code apply?**

A: All EGYTRAFO employees at all levels must adhere to the Code of Ethics and Conduct. There are no exceptions.

**Q: What if I violate this code by accident?**

A: All EGYTRAFO employees have a responsibility to ensure that their actions are consistent with the Code of Ethics and Conduct. This is why we ask you to review this code carefully. You are also expected to bring any questions or concerns to your manager or to the HR Department. If you take actions that are inconsistent with the behaviors described in the Code or other Company policies, stating that you had good intentions or that you didn't know your actions were inappropriate may not protect you from disciplinary action or legal consequences.

**Q: My manager told me to do something that I think might be against the law. What should I do?**

A: You should talk to your manager to make sure that you understand the request. If, after that conversation, you still have concerns, you should contact the Managing Director or the HR Department to report your concerns.

**Q: Is the Code of Ethics and Conduct confidential?**

A: No, we make our Code of Ethics and Conduct available on our website and provide copies upon request.

**Q: Do we expect our suppliers to follow EGYTRAFO's Code of Ethics and Conduct?**

A: We expect our suppliers to demonstrate the same high ethical standard that we adhere to within the company.

## Non-Retaliation Policy

It is EGYTRAFO's policy and practice to maintain the highest ethical standards and to create a workplace free of inappropriate or unlawful behavior in which people are encouraged to share their concerns with the Company without fear of retaliation. Consequently, at EGYTRAFO, no adverse action will be taken against any employee, former employee, or third party about, reporting, participating in or assisting in the investigation of a suspected violation of the Company's Code of Ethics and Conduct, Company policy or applicable law, unless the allegation made or information provided is found to be intentionally false. To the maximum extent possible, EGYTRAFO will maintain the confidentiality of all complaints. All allegations of retaliation will be investigated, and if appropriate, disciplinary action will be taken, up to and including termination.





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