

Anti-Corruption and Anti-Money Laundering

GROUP COMPLIANCE



Document Approval

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1. Definitions

Corruption	The Misuse of entrusted power for private gain.
Bribery	Any payment, facilitation of payment, or acceptance of anything of value for the purpose of being given an improper advantage in the conduct of business
Conflict of Interest	Any situation that puts an employee in a position whereby their personal or business circumstances/interests would affect their judgement to pursue the best interest of the organization
Facilitation Payment	A “facilitation payment” is the payment of a relatively small amount of money or the granting of any other benefit to usually low-ranking government officials, for their own personal benefit, with the aim of speeding up the performance of an official act to which the person making the payment/granting the benefit is entitled. This means that the government entity concerned would perform the official act in the same form and in any event, without payment to the government official (including, for example, granting approval where all preconditions are satisfied).
Gifts	Anything of value given or received as the result of a business relationship.
Money Laundering	The movement of cash or other assets generated from illegal activities through legitimate businesses to conceal the source of the funds or make it appear that the source of funds is legitimate.
Smuggling	The illegal movement of goods/objects/people, into or out of a country, that are subject to customs/ taxes/ visas without paying/obtaining them in order to gain a financial or other material benefit.
Human Trafficking	The act of recruiting and transferring people with the use of threat, abduction, fraud, deception, abuse of power, or any other act of coercion for the purpose of exploitation.
Third Parties	Any Strategic business partners, Contractors, Sponsors, Suppliers, Distributors, Clients, Consultants, Government Entities, Charitable organizations, Brokers engaged during business acquisitions, and any investor/bank providing a source of funding.

2. Scope and Responsibility



2.1. Introduction to the Policy

2.1.1. The purpose of Elsewedy Electric's anti-corruption & anti-money laundering policy (hereafter: the "Policy") is to outline and explain the prohibitions against bribery, corruption, and money laundering in all business operations, to highlight compliance requirements related to these activities, to reinforce the organization's commitment to conducting business ethically, to serve as a point of reference for all Elsewedy Electric staff to ensure unity and application, and finally to assist management in addressing corruption and money laundering related issues.

2.1.2. Elsewedy Electric board members and executives will demonstrate leadership and set the tone from the top to ensure that, at every level of the organization, employees do not tolerate, participate in, or condone corrupt behavior.

2.1.3. The main objectives of this policy include, but are not limited to the following:

- Ensure that all employees of Elsewedy Electric Group comply with all applicable anti-corruption and anti-money laundering laws and regulations.
- Ensure all business conducted on behalf of Elsewedy Electric Group and its subsidiaries is always conducted in a highly ethical and honest manner.
- Establish a framework to fight against money laundering and corruption through the implementation of controls.

2.1.4. Definitions in this policy are used only in instances where they provide the necessary background, within the context of this policy; this means that this policy does not necessarily contain all definitions.

2. Scope and Responsibility



2.1. Introduction to the Policy

2.1.5. Each company within the group must comply with the groups' policy and the local countries' laws and regulations that they are operating in. The list below provides an example of the laws and regulations in various jurisdictions governing anti-corruption and money laundering:

- The Foreign Corrupt Practices Act (FCPA) is a US law that prohibits the payment of anything of value to a foreign official with the intent of obtaining a business advantage. The US law also requires companies to refrain from conducting business with sanctioned countries, companies, individuals, (ports and vessels for supply chain and logistics), as per the regulations published by the Office of Foreign Assets Control (OFAC).
- Regulations in the European Union require companies to refrain from conducting business with sanctioned countries, companies, individuals, (ports and vessels for supply chain and logistics), as per the regulations published by the European Union.
- The law in the United Kingdom requires companies to adhere to all applicable regulations as per the UK Anti-Bribery Act of 2010, and refrain from conducting business with sanctioned countries, companies, individuals, (ports and vessels for supply chain and logistics), as per the Sanctions and Anti-Money Laundering Act of 2018.
- All Elsewedy Electric employees and its subsidiaries must adhere to all applicable regulations and refrain from conducting business as per the regulations published by the United Nations, local laws and regulations of each country, and the organization's internal policies.

2. Scope and Responsibility



2.1. Introduction to the Policy

2.1.6. Violating applicable anti-corruption and anti-money laundering laws potentially exposes the organization, its employees, and any third-party intermediaries (regardless of nationality or location of residence) to significant criminal and civil liability, fines, and penalties.

2.1.7. Elsewedy Electric encourages all stakeholders to report suspected corruption or violations of the law and guidance is provided herein on how to raise concerns.

2.2. Responsibility of Group Compliance

2.2.1. Elsewedy Electric's Group Compliance is responsible for taking the appropriate measures to make it easier for the employees to report corruption, so that situations or behaviors that violate the company's policies or applicable regulations can be identified and remedied.

2.2.2. Group Compliance will ensure compliance with this policy and investigate any breaches in relation to this policy.

2. Scope and Responsibility



2.2. Responsibility of Group Compliance

2.2.3. Group Compliance is the custodian of this policy and is expected to ensure that this policy is a true and accurate representation of the applicable policies and that it is kept up to date at all times.

2.2.4. Group Compliance, in coordination with the Human Resources Department, will communicate the policy and provide the necessary training to relevant employees.

2.2.5. This policy will be reviewed on an annual basis by Group Compliance to ensure that it is consistent with the objectives of the Elsewedy Electric Group.

2.2.6. Group Compliance will monitor the implementation of this policy throughout the organization and report on anti-bribery, anti-corruption, and anti-money laundering compliance adequacy and effectiveness to Executives and the Board.

2.2.7. Group Compliance will keep a record of all received claims, all investigations, and all evidence to support claims. Records will only be accessible by employees in Group Compliance to allow for the maintenance of confidentiality.

2. Scope and Responsibility



2.3. Responsibility of the Legal Department

2.3.1. The Legal Department will not approve any contract with a third party unless the proper due diligence procedures have been completed by Group Compliance and the third party has been authorized to be pursued for the purpose of establishing a business relationship.

2.3.2. The Legal Department, in coordination with the Compliance and Human Resources Departments, will investigate alleged or suspected breaches of the policy or the law.

2.4. Responsibility of Business Owners

2.4.1. All business owners are required to follow up on their employees' awareness and completion of all the required anti-corruption and anti-money laundering training.

2.4.2. The relevant business owner is responsible for ensuring that any third party with which the organization deals has passed the due diligence and screening process, prior to initiation of any business activities.

2. Scope and Responsibility



2.5. Scope

2.5.1. This policy applies to all Elsewedy Electric entities, subsidiaries, employees (including permanent and temporary employees, interns, volunteers, etc.) and third parties acting on behalf of Elsewedy Electric (including representatives of the company).

2.5.2. In addition, Elsewedy Electric joint ventures (including joint-ventures that Elsewedy Electric is a non-controlling shareholder), third parties with which Elsewedy Electric does business, and business partners must be aware of the policy and comply with it.

2.5.3. This policy covers the following sections:

- Corruption and bribery,
- Money laundering,
- Reporting corruption and money laundering, and
- Sanctions and penalties.

2. Scope and Responsibility



2.6. Purpose

2.6.1. Elsewedy Electric seeks to conduct business in an ethical manner by ensuring all employees are in full compliance with the applicable anti-corruption and anti-money laundering laws by providing the knowledge and support necessary to identify and combat corruption.

2.6.2. Even the appearance of impropriety in giving or receiving anything of value is inconsistent with the commitment to this policy and jeopardizes Elsewedy Electric.

2.6.3. Elsewedy Electric is committed to helping detect and reduce suspicious activity including offenses related to money laundering and terrorist financing.

2.6.4. Elsewedy Electric takes on a zero tolerance approach to any form of corruption or money laundering by any internal or external stakeholder.

2.7. Distribution

2.7.1. This policy will be made available to the employees in a non-editable version on Elsewedy Electric's intranet. All employees who are involved in business activities must have a thorough understanding of this policy.



WHAT IS BRIBERY AND CORRUPTION?

- 3.1. Recognizing and Avoiding Corruption and Bribery
- 3.2. Accepting and Offering Gifts
- 3.3. Facilitation Payments
- 3.4. Charitable Donations

Corruption

- 3.5. Sponsorships
- 3.6. Political Contributions
- 3.7. Interactions with Government Officials
- 3.8. Conflicts of Interest



BRIBERY AND CORRUPTION

3. Corruption



3.1 Recognizing and Avoiding Corruption and Bribery

3.1.1. Corruption and bribery are against Elsewedy Electric's values, are illegal, and can expose both employees and the organization to severe financial penalties, reputational damage, and imprisonment. The organization and all of its subsidiaries are committed to acting professionally and with integrity in all business dealings and relationships.

3.1.2. Any form of corruption or bribery is prohibited. Employees of Elsewedy Electric and its subsidiaries are prohibited from influencing others, directly or indirectly, by promising, offering, paying, or receiving bribes, kickbacks, anything of value, or by any other means that is considered unethical or illegal.

3.1.3. Providing or accepting the following for the purpose of influencing any act or decision, is considered bribery:

- Cash or cash equivalents (such as gift cards, vouchers, shares, or cheques)
- Gifts
- Facilitation payments
- Political contributions
- Charitable donations

3.1.4. Elsewedy Electric employees are required to be aware of the risks associated with any acts of corruption. The organization is responsible for any corruption carried out by third parties who conduct businesses on behalf of Elsewedy Electric.

3. Corruption



3.1 Recognizing and Avoiding Corruption and Bribery

3.1.5. Employees are responsible for understanding how this policy relates to their daily job duties and complying with it. To prevent corrupt conduct, employees must follow these guidelines:

- Recognize the signs of corruption and bribery,
- Comply with the anti-corruption and bribery policy,
- Know the Stakeholders and the business with whom the organization is doing business,
- Know the applicable laws and seek guidance from Group Compliance and Legal Departments; and,
- Report any corruption or bribery incidents directly to your business leader or through the whistleblowing reporting mechanism.

3.2. Accepting and Offering Gifts

3.2.1. Gifts can be benefits offered by or to third parties that might include, but are not limited to:

- Goods and services,
- Promotional products, or
- Transportation, meals, and entertainment.

3. Corruption



3.2. Accepting and Offering Gifts

3.2.2. Employees are permitted to accept and offer gifts or hospitalities that are:

- Reasonable in value and within the approved financial threshold (Refer to Appendix A),
- Related to a legitimate business reason,
- Appropriate to the occasion,
- Designed so as not to influence any third party nor would it be perceived as influencing any third party,
- Occasional, the frequency of accepting a gift must not raise any conflicts of interest,
- Received in an honest and transparent manner,
- Contest prizes and awards may be offered if part of an Elsewedy Electric approved event or campaign.

3.2.3. Employees are required to obtain approval from Group Compliance when accepting gifts, by filling out the Gifts Disclosure Form (Refer to Appendix B), above the value specified in this policy (Refer to Appendix A).

- If Group Compliance approves the gift, the employee may keep it.
- If Group Compliance informs the employee to return the gift, the employee is not allowed to keep the gift. If the gift is not returned by the employee, this will be considered as an act of bribery.

3. Corruption



3.2. Accepting and Offering Gifts

3.2.4. Approval for offering gifts is based on the value according to the approved financial authority matrix, along with Group Compliance.

3.2.5. Employees are prohibited from offering cash or cash equivalents, such as gift cards, vouchers, shares, or checks, as a gift, whether directly or indirectly (through a third party), even if such gifts are permitted under local laws or acceptable according to local culture.

3.2.6. Employees must never offer or accept gifts that are extravagant and make them susceptible to influence.

3.2.7. All third-party meals or entertainment offered or accepted by employees must have a business purpose, be restricted to the direct business stakeholders, and always in accordance with local culture.

3.2.8. All transportation and accommodation offered or accepted must serve a legitimate business purpose.

3.2.9. Employees must be transparent with their superiors with regards to offering and accepting gifts in order to avoid any possibility of suspicion of violating Elsewedy Electric's policies.

3.2.10. All gifts offered or accepted by employees must be in line with Elsewedy Electric policies. The level of appropriate business expenditures may vary from country to country, therefore before offering or accepting any gift during the course of business, employees are required to obtain consent from Group Compliance.

3. Corruption



3.3. Facilitation Payments

3.3.1. Facilitation payments can include, but are not limited to, the following:

- Making a payment to an officer to expedite work permits and licenses in order to begin operations for a project.
- Making payments to secure a governmental service that the company is legally entitled to.
- Receiving a payment from a third party to expedite contract signing.

3.3.2. Although facilitation payments can be considered the cost of doing business in some cultures, employees must be aware that providing or accepting facilitation payments may be illegal and are strictly prohibited by Elsewedy Electric.

3.3.3. In the case where an employee is offered a facilitation payment, the employee must act as follows:

- Refuse the facilitation payment, and
- Immediately inform their direct manager and Group Compliance.

3.3.4. Facilitation payment can only be permitted in unavoidable situations where not making the payment may put an employee's safety at risk. Following the payment, an incident report (Refer to Appendix D) detailing the amount that was paid, to whom, and the reason for payment, must be submitted to Group Compliance immediately.

3. Corruption



3.4. Charitable Donations

3.4.1. Making donations to charities on behalf of Elsewedy Electric may represent significant risks of corruption to the organization as they can be a channel for corrupt payments.

3.4.2. A charitable donation can be in the form of cash, services, development aid support, and new or used goods. All payments made as charitable donations on behalf of the organization are required to be documented.

3.4.3. No employee/subsidiary conducting business on behalf of Elsewedy Electric is permitted to make donations under the name of the organization. Charitable donations on behalf of the organization can only be made by the following and as per the approved Financial Authority Matrix:

- The Corporate Social Responsibility Department of the holding company.
- Subsidiaries sending donations to the ElSewedy Technical Academy (STA) account.

3.4.4. It is never permissible to provide a donation to improperly influence a government official, or in exchange for any improper favor or benefit. It may, however, be permissible to make donations directly to a government agency (rather than to an individual government official) as part of a charitable effort, as per the approved Financial Authority Matrix. Prior approval of the Corporate Social Responsibility Department, Group Compliance, and the Group Chief Executive Officer is required before making such a donation (according to the Financial Authority Matrix).

3. Corruption



3.5. Sponsorships

3.5.1. Employees must adhere to the following guidelines when identifying sponsorship opportunities:

- Confirm the sponsorship opportunity is related to the organization and aligned with the corporate strategy.
- Assess the terms of the sponsorship agreement to ensure that they do not limit the company's ability to operate independently.
- Ensure that any products or services offered as part of the sponsorship agreement are:
 - a. Consistent with company objectives,
 - b. Within reasonable value,
 - c. Not intended to provide any improper advantage for the organization,
 - d. Do not influence any third party, and
 - e. Are not used to influence a decision in favor of the Elsewedy Electric.

3.5.2. Any employee who wishes to organize a sponsorship must request approval from the Corporate Social Responsibility, Group Compliance, and approvals as per the Financial Authority Matrix (based on the value of sponsorship).

3. Corruption



3.6. Political Contributions

3.6.1. Political contributions must not be made to acquire business or to provide any improper advantage for the organization. Elsewedy Electric prohibits the use of corporate funds or assets to make political contributions.

3.6.2. Elsewedy Electric prohibits all forms of corporate political contributions. Employees are prohibited from making contributions to organizations indirectly benefiting or controlled by politicians, public officials or their relatives.

3.6.3. Political contributions can include but are not limited to the following:

- Buying tickets for political fundraising events,
- Donations of products or services made to political figures, or
- Allowing the use of organization facilities by any political figure.

3. Corruption



3.7. Interactions with Government Officials

3.7.1. A government official can be any of the following:

- An individual elected or appointed to a governmental entity,
- An official or employee of a government,
- An official or employee of a company wholly or partially controlled by a government (such as state-owned companies),
- A candidate for political/government office, or
- A person acting in an official capacity for any of the above regardless of rank or position.

3.7.2. Employees of Elsewedy Electric must be careful when interacting with government officials, their family members, or close associates to avoid any act that could be misinterpreted as corruption. Any interaction with government officials is required to be communicated clearly and with supportive documents.

3.7.3. The policies for offering and accepting of gifts included in this document must be applied when considering accepting or offering gifts to government officials. Additionally, employees must obtain prior written approval from Group Compliance when offering a gift to a government official.

3.7.4. Gifts and hospitalities including donations, meals, travel, and entertainment offered to or accepted from government officials must be related to a legitimate business purpose, of a reasonable value, and designed not to influence business decisions.

3.7.5. Employees are prohibited from making hiring decisions based on recommendations from government officials, this will be considered an act of corruption.

3. Corruption



3.8.Conflicts of Interest

3.8.1.Conflicts of interest arise when an employee's personal interests conflict with the interests of Elsewedy Electric, leading to an impact on their judgement in performing work.

3.8.2.Employees must be aware of situations that expose them to having a conflict of interest. The following are examples of potential conflicts of interest that may occur:

- An employee who has a direct or indirect personal relationship with any of Elsewedy's competitors, partners, or suppliers, when his/her job position includes interaction with external parties.
- An employee who engages or has interests, either directly or indirectly, in any other business activities or employment in a way that interferes with his/her job position at Elsewedy Electric or which may lead to a breach of labor laws.
- Serving on the Board of Directors of an organization that is a competitor of Elsewedy Electric.
- Taking personal advantage of a business opportunity that an employee has become aware of because of their work at Elsewedy Electric.
- Being an officer or director of any company not belonging to the Elsewedy Electric Group.
- An employee who has a political mandate that interferes with his/her job position.

3.8.3.Employees must never accept or perform favors that personally benefit themselves or subject them to influence by other persons. Employees must also refrain from participating in decision making activities related to their conflicts.

3.8.4.Employees at Elsewedy Electric must disclose any information regarding potential conflicts of interest they may have while conducting business in terms of relationships with business partners. Employees must fill out and sign an annual disclosure form declaring all conflicts of interest (Refer to Appendix E).

4. Third Party Due Diligence and Screening



4.1 Third Party Due Diligence and Screening.

4.1.1. Anti-money laundering due diligence reviews are required to be carried out before entering into any business relationship with any potential partner third party.

4.1.2. Third parties screening includes but not limited to:

- Strategic business partners,
- Contractors,
- Sponsors,
- Suppliers,
- Distributors,
- Clients,
- Government Entities,
- Consultants,
- Charitable organizations,
- Brokers engaged during business acquisitions, and
- Any investor/bank providing a source of funding.



LSEG World Check

4. Third Party Due Diligence and Screening



4.1 Third Party Due Diligence and Screening.

4.1.3. Elsewedy Electric will perform screening for all third parties that the holding company or any of its subsidiaries are planning to conduct business with, as early as possible (for example, after purchase request is approved), and before any project/contract/deal is made with the third party

4.1.4. Screening must be completed prior to contract signing or initiation of any business activities in order to identify the risks associated with conducting business with each third party.

4.1.5. Employees must not sign contracts with or engage in any business activities with third parties until authorization has been received from Group Compliance.

4.1.6. Due diligence is performed as the first phase of screening to ensure the third party is:

- A legitimate business entity; and,
- Maintains standards consistent with the legal and ethical standards of Elsewedy Electric.

4. Third Party Due Diligence and Screening



4.1 Third Party Due Diligence and Screening.

- 4.1.7. Third party due diligence is conducted by Group Compliance for all third parties. Third party due diligence measures must:
- Identify the third party and verify their identity based on documents or information that are obtained from a reliable and independent source. This is referred to as identification data and can include obtaining a copy of their ID and proof of address.
 - Identify the ultimate beneficial owner of the business, if there are any, and verify their identity to understand the ownership and control structure of the company.
 - Retrieve information and understand the purpose of the relationship or project in the framework of the third party's operations, including its business activities. This refers to knowing what Elsewedy Electric will do with or for the third party and why.

4. Third Party Due Diligence and Screening



4.1 Third Party Due Diligence and Screening.

4.1.8. In order to avoid becoming involved in any money laundering activities, business owners who plan to conduct business with potential third parties on behalf of or for Elsewedy Electric, must comply with the following:

- Business owners must fill out a due diligence questionnaire (Refer to Appendix C) detailing the name of the company, its shareholders, its location, whether it has subsidiaries, and all other required information for each expected third party.
- Business owners must submit the questionnaire to Group Compliance (Compliance-Int@ELSEWEDY.com) for screening.
- If a business owner receives authorization from Group Compliance to pursue a business relationship with the third party, contract negotiation may proceed.
- If a business owner does not receive authorization from Group Compliance, the business owner is prohibited from pursuing a business relationship with the third party and instead must look for an alternative third party.
- Due diligence expires on an annual basis. Third parties who have been previously approved by Group Compliance are required to be submitted for due diligence annually.

4.1.9. While opportunities for conducting business in sanctioned countries, companies, individuals, (ports and vessels for supply chain and logistics) is prohibited and will be rejected at the initial stage of the screening process, any third party known to have political affiliations or concerns will be flagged, and the decision for pursuing this third party for a business relationship will be up to the relevant senior management.



4.1.10. If areas of non-conformance to Elsewedy Electric policies and standards are identified by Group Compliance during due diligence, the third party and the relevant Elsewedy Electric business owner may collaborate and agree on an action plan consisting of appropriate improvement measures in order to proceed with contract initiation, according to the below screening results:

Passed	No Red Flags were Identified
Passed With Control	1 or more red flags were identified and can be mitigated
Failed	1 or more red flags were identified and cannot be mitigated

4. Third Party Due Diligence and Screening



4.1 Third Party Due Diligence and Screening.

4.1.11. Third parties who take part in the following activities will not be authorized for partnership:

- Human trafficking,
- Smuggling, or
- Are owned by an individual or entity with frozen assets.

4.1.12. Business owners must monitor the business relationship and activities undertaken throughout the course of the relationship in order to ensure that the activities taking place are aligned and consistent with the company's knowledge of the third party, the third party's business and risk profile, including sources of funds.

5. Money Laundering



5.1 What is Money-Laundering

5.1.1. The purpose of money laundering is to make illegally obtained money or assets appear legitimate and hide their links to criminal activities.

5.1.2. Money laundering covers a wide variety of crimes from which individuals or companies derive a financial benefit, that include any of the following activities:

- Using illegitimate funds to conduct business activities on behalf of the organization,
- Concealing the true source of funds knowing that the funds are derived from criminal activity,
- Financing of terrorist activities, or
- Direct or indirect participation in, association to, or facilitating the commission of the above activities.

5.1.3. Money laundering is regarded as such even if the activities that occurred were carried out in another country. All employees are required to be alert against the financial crime and fraud risks that the organization faces.

6. Reporting Violations



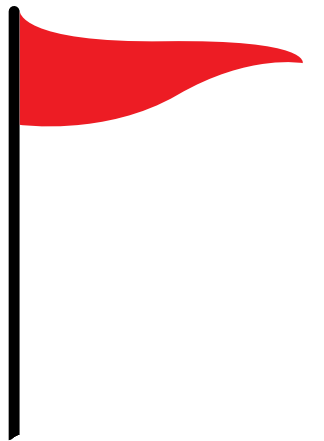
6.1 Red Flags.

6.1.1. Employees are required to be able to identify red flags that may indicate corruption or money laundering is occurring.

These may include but are not limited to the following:

- Payment methods inconsistent with contract terms,
- Services made but not accounted for by documents,
- Requests for bribes,
- Tax evasion,
- Third parties insisting business is conducted without a signed contract,
- Refusal by a third party to provide information you have requested without a legitimate explanation,
- Ambiguous “consulting fees” on invoices or invoices that have not been signed,
- Any request that has been made a condition for business to continue,
- The third party presented fake documents, false information, or is involved in suspicious or criminal activity,
- Demands from a third party to receive payment prior to contract signing,
- Unusual fund transfers to or from countries unrelated to business operations,
- Offers to pay in cash or overpayments followed by requests for refunds,
- Requests from a third party to make payments on their behalf or to a person who is not related to the transaction being discussed, or
- Inconsistent or unusual payments or purchases.

6.1.2. Employees must always proceed with caution in any situation that may be perceived as corrupt.



6. Reporting Violations



6.1.3. Employees must not proceed with any action until Group Compliance has provided consent.

6.2 Reporting Methods

6.2.1. If any employee has doubts as to whether a situation exposes them to corruption or money laundering or feels concerned that their involvement in a transaction may amount to a breach of law or this policy, the employee is required to reach out to Group Compliance before any action is taken.

6.2.2. If any employee recognizes a red flag or knowledge of corruption or money laundering activities, they are required to immediately report this information to Group Compliance or use any of the available reporting channels:

- **Online Portal - Speak Up (<https://compliance.elsewedy.com/>)**
- **Email (Compliance-Int@ELSEWEDY.com)**
- **Mail (Plot No. 13co3, Cairo Festival City- business Park, 5th Settlement, New Cairo, Egypt)**



6.2.3. Employees must include as much information as possible when reporting such as the details of the people involved, the dates of any transactions, details of the suspected transactions, and any other information that may aid Group Compliance during investigation.

6.2.4. The Board of Elsewedy Electric will not penalize business owners for any loss of business resulting from adherence to this policy. No employee will be reprimanded or face any employment consequences for bringing to the attention of the Group Compliance, in good faith, a known or suspected violation of this policy

7. Disciplinary Actions and Penalties



Company Penalties



Legal Penalties



Compliance is Everyone's Responsibility