

## 1. PURPOSE

The purpose of this Anti-Bribery Policy is to establish clear standards and procedures to prevent bribery and corruption in all business activities conducted by the Company. This Policy demonstrates the Company's commitment to conducting business with integrity, transparency, and in compliance with all applicable laws and ethical standards.

This Policy supports the Company's Code of Conduct, Anti-Corruption Policy, and Corporate Governance Framework and forms part of the Company's overall compliance and risk management system.

## 2. SCOPE

This Policy applies to:

- All employees, officers, and directors of the Company
- Temporary employees, contractors, consultants, and interns
- Business partners, agents, representatives, and intermediaries
- Vendors, suppliers, and service providers acting on behalf of the Company
- Subsidiaries and affiliated entities

All individuals and entities covered by this Policy are required to comply with its provisions regardless of location or business function.

## 3. POLICY STATEMENT

The Company adopts a zero-tolerance approach to bribery and corruption.

The Company strictly prohibits offering, giving, requesting, receiving, or authorizing any bribe or improper payment, whether directly or indirectly, to any individual, organization, or government official in order to:

- Obtain or retain business
- Gain an unfair advantage
- Influence a business decision
- Secure licenses or approvals
- Avoid penalties, taxes, or regulatory requirements
- Influence procurement or tender processes

Bribery is prohibited regardless of the amount involved.

## 4. LEGAL AND REGULATORY COMPLIANCE

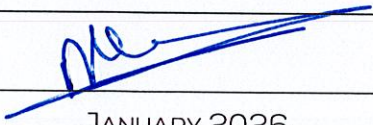
The Company complies with all applicable anti-bribery and anti-corruption laws and regulations.

Employees and business partners must comply with the strictest applicable legal requirements.



# ANTI-BRIBERY POLICY

VERSION NUMBER: CCIABP02

PREPARED BY	RESEARCH & DEVELOPMENT DEPT
NAME & TITLE OF APPROVER	MOHAMAD KARAKI – CCI GENERAL MANAGER
SIGNATURE OF APPROVER	
DATE APPROVED	JANUARY 2026

## 5. DEFINITIONS

➤ **Bribery** is the offering, promising, giving, requesting, or receiving of anything of value to improperly influence a decision or obtain an advantage.

➤ **Anything of Value**

Anything of value includes, but is not limited to:

- Cash or cash equivalents
- Gifts
- Travel or accommodation
- Entertainment or hospitality
- Discounts or rebates
- Donations or sponsorships
- Employment opportunities
- Services or favors
- Confidential information

➤ **Government Official**

A government official includes:

- Government employees
- Public officials
- Political candidates
- Employees of state-owned enterprises
- Regulatory authorities
- Customs or tax officials

## 6. PROHIBITED CONDUCT

The following activities are strictly prohibited:

- Offering or accepting bribes
- Facilitation payments
- Kickbacks
- Improper commissions
- Undocumented payments
- Payments to secure contracts or approvals
- Using third parties to make improper payments
- Concealing transactions or falsifying records
- Providing gifts or hospitality intended to influence decisions

Employees must not engage in any activity that could create the appearance of bribery or corruption.

## 7. GIFTS, HOSPITALITY, AND ENTERTAINMENT

Gifts and hospitality must be reasonable, transparent, and related to legitimate business purposes.

Employees must comply with the Company's Gifts and Hospitality Policy.

The following principles apply:

- Gifts must be modest and infrequent
- Gifts must not influence business decisions
- Gifts must be properly recorded
- Cash gifts are strictly prohibited
- All gifts above approved thresholds require management approval

## 8. FACILITATION PAYMENTS

Facilitation payments are small payments made to expedite routine government actions. The Company strictly prohibits facilitation payments, except where an employee's health or safety is at risk.

Any such payment must be:

- Reported immediately
- Documented accurately
- Reviewed by the Compliance function

## 9. THIRD-PARTY DUE DILIGENCE

Before engaging any third party, the Company shall conduct risk-based due diligence to assess integrity and compliance risks.

Due diligence shall include:

- Verification of legal registration
- Background screening
- Conflict of interest assessment
- Sanctions and watchlist screening
- Review of business reputation
- Evaluation of financial stability

High-risk third parties require approval from senior management or the Compliance function.

Third parties must agree in writing to comply with this Policy.

## 10. CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS

Charitable donations and sponsorships must:

- Serve legitimate business or community purposes
- Be properly documented
- Be approved by management
- Not be used to influence business decisions

Political contributions using Company funds are strictly prohibited unless permitted by law and approved by the Board of Directors.

## 11. RECORD KEEPING AND FINANCIAL CONTROLS

The Company maintains accurate and complete records of all financial transactions. Employees must ensure that:

- Transactions are properly documented
- Expenses are supported by receipts
- Payments are authorized and approved
- Financial records reflect actual business activities

Falsification or manipulation of records is strictly prohibited.

## 12. CONFLICT OF INTEREST

Employees must avoid situations where personal interests conflict with the interests of the Company.

Employees must disclose:

- Financial interests in suppliers or competitors
- Family relationships with business partners
- Outside employment
- Personal benefits related to Company business

All conflicts must be declared in accordance with the Conflict of Interest Policy.

## 13. REPORTING AND WHISTLEBLOWING

Employees must report any suspected or actual bribery or corruption immediately.

Reports may be made through:

- Direct manager
- Compliance function
- Human Resources
- Internal reporting channels
- Whistleblowing system

The Company strictly prohibits retaliation against individuals who report concerns in good faith.

Anonymous reporting is permitted where allowed by law.

## 14. TRAINING AND AWARENESS

The Company provides anti-bribery and ethics training to employees and relevant third parties.

Training requirements include:

- Training upon hiring
- Annual refresher training
- Role-specific compliance training
- Awareness communication campaigns

Training participation shall be documented and retained.

## 15. MONITORING AND AUDIT

The Company monitors compliance with this Policy through:

- Internal audits
- Risk assessments
- Transaction reviews
- Compliance monitoring
- Incident investigations

Audit findings shall be reported to senior management and the Board of Directors. Corrective actions shall be implemented as necessary.

## 16. DISCIPLINARY ACTION

Violations of this Policy may result in disciplinary action, including:

- Written warning
- Suspension
- Termination of employment
- Contract termination
- Legal action

Disciplinary measures shall be applied consistently and fairly.

## 17. ROLES AND RESPONSIBILITIES

### ➤ Board of Directors

The Board is responsible for:

- Oversight of the anti-bribery program
- Approval of policies
- Monitoring compliance performance

### ➤ Chief Executive Officer

The CEO is responsible for:

- Ensuring implementation of this Policy
  - Promoting ethical leadership
  - Allocating compliance resources
- ### ➤ Compliance Manager / Head of Compliance

Responsible for:

- Policy implementation
- Risk assessments
- Training programs
- Investigations
- Compliance reporting

### ➤ Managers and Supervisors

Responsible for:

- Enforcing compliance within departments
- Monitoring employee behavior
- Reporting suspected violations

➤ **Employees**

Responsible for:

- Complying with this Policy
- Reporting concerns
- Completing required training

*This document will be reviewed, updated, and communicated with related Employees at least annually.*

**A- CHANGE CONTROL**

<i>Version Number</i>	<i>Effective Date Month. Year</i>	<i>Changes Applied (Brief Description)</i>
<i>CCI</i>	<i>2023</i>	<i>N/A</i>
<i>CCI</i>	<i>2026</i>	<i>N/A</i>

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