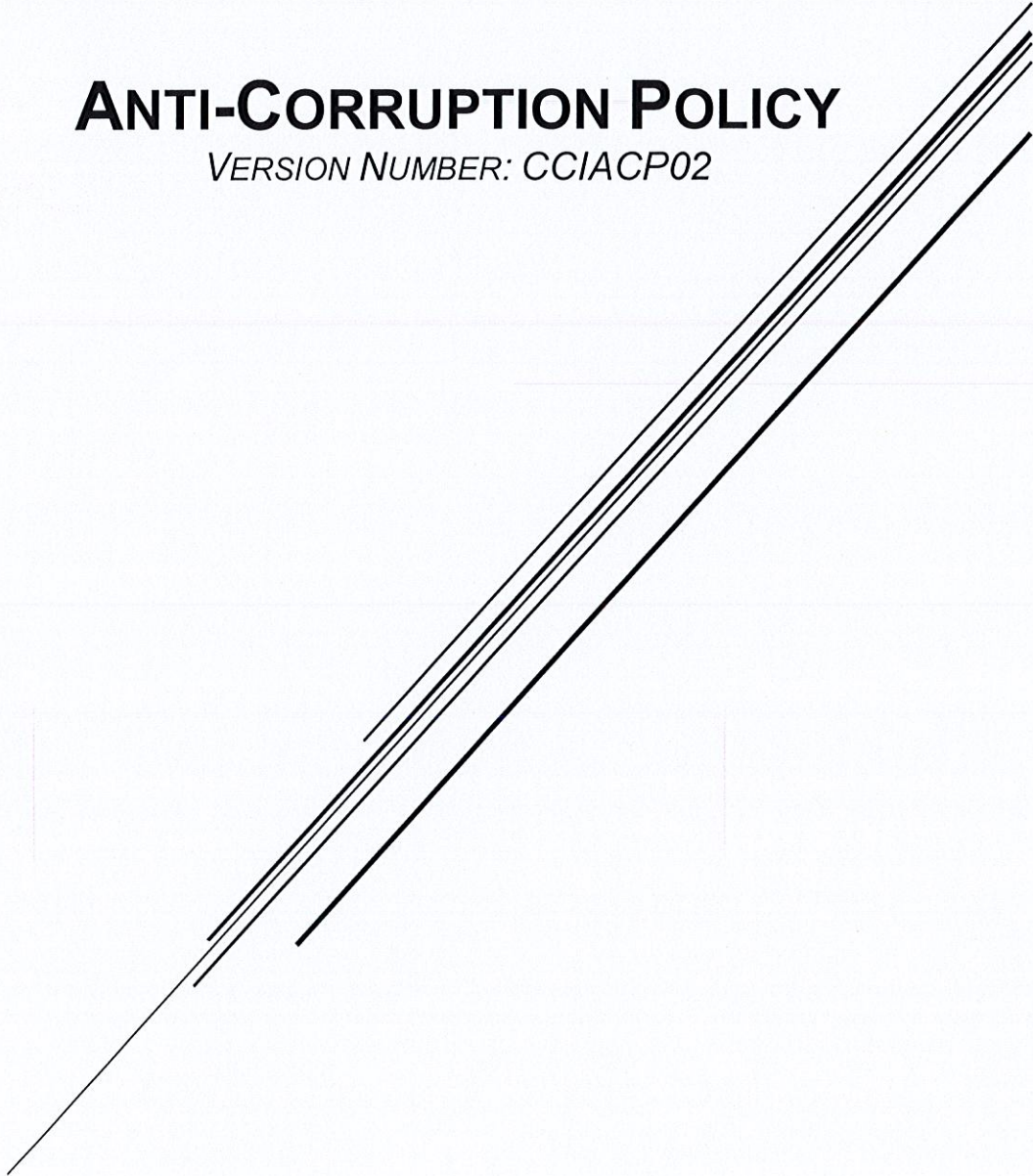
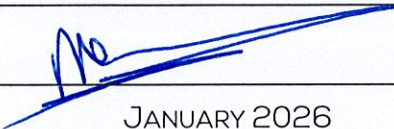


ANTI-CORRUPTION POLICY

VERSION NUMBER: CCIACP02



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

LETTER FROM THE CEO

CCI Holding with all companies within its umbrella including CCI Sal has been conducting business for over 34 years. During that time, our people all over the Mena Region have worked hard to create and protect our most important business asset—integrity.

Corruption is a threat to our business and Employees, and is counter to our culture. We owe it to our customers, our communities, our shareholders, our partners and ourselves to conduct our business pursuant to high ethical standards and to denounce corruption.

To state it simply: *We do not pay bribes.*

It is more important than ever that we have clear company policies against corruption and take steps to ensure that we always comply with those policies. This Code represents a key part of CCI's commitment to comply with the anti-corruption laws around the world. This Code embodies our values and demonstrates our firm commitment to being a leader in the global fight against corruption. CCI is always competitive when the playing field is level, so combating corruption is very much in our best interest.

Sincerely,

Mohamad Karaki
CEO
CCI Holding

I- INTRODUCTION

At CCI, we have a simple rule: **WE DO NOT PAY BRIBES**

CCI considers a “bribe” to be anything that has value and is given to influence a decision to do business with or to give an unfair advantage to CCI. This includes bringing in new business, keeping existing business, or gaining some improper advantage. It also includes obtaining licenses or regulatory approvals, preventing negative government actions, reducing taxes, avoiding duties or customs fees, or blocking a competitor from bidding on business.

Bribes do not just involve cash payments. Lavish gifts, improper campaign contributions, scholarships, luxury goods, charitable donations, tickets to sporting events, business opportunities, and jewelry or gems have all been found to be bribes.

Not only are bribes prohibited by CCI policy, but bribes to government officials and commercial business are also illegal in every country in which we do business. Many countries also make it a crime to bribe Employees of commercial enterprises. CCI is committed to complying with the anti-corruption measures.

II- SCOPE

The scope of this Policy and Procedure applies to every CCI employees, including senior executive and financial officers, and to members of our Board of Directors, and reflects the standard to which the company expects its business associates, partners, agents, contractors, and consultants to adhere when acting on the company’s behalf.

This Policy is intended to supplement all applicable laws, rules, and other corporate policies.

III- COMPLIANCE WITH THIS CODE

The Management of CCI adopted this Code to promote compliance with ethical standards, policies, and applicable law related to corruption. While it is true that everyone is required to comply with the law, this Code goes beyond that and sets a higher standard for us to follow.

Each Employee is responsible for conducting himself or herself in compliance with this Code, policies, and applicable local laws and regulations. In addition, joint venture partners and certain third parties who represent CCI in front of others are contractually bound to follow relevant sections of this Code.

IV- COMPANY RISK ASSESSMENT

On a quarterly basis, the Anti-Corruption Risk Assessment is conducted to ensure CCI and all its Employees are complying with this Code. This Risk Assessment is completed by the General Manager, should it yield a Medium or High score, it is communicated with the Group CEO. In addition, further training will be conducted with all CCI Employees.

V- CONTENTS

This Code provides you with CCI anti-corruption compliance policies as well as guidance on how to address corruption risks. It requires you to adhere to CCI's high ethical standards in situations that could occur in conducting our business.

VI- CHANGES

This Code is subject to review at any time, and it may be revised from time to time. The most current version of this Code will always be available on CCI's SharePoint webpage and will be communicated with all Employees via email.

VII- COMPLIANCE IS MANDATORY

It is your responsibility to read and understand this Code. Anyone who violates the standards in this Code will be subject to appropriate disciplinary action, including termination of his or her relationship with CCI. He or she could also be subject to criminal prosecution by governmental authorities.

VIII- RESPONSIBILITY & ACCOUNTABILITY

It is the responsibility of the Top Management and the designated officer to ensure the following Procedure is adhered to. The Management shall review this Policy on an annual basis for appropriateness, compliance internally with the company and for compliance with all applicable standards, acts, legislation, etc.

Requests for additional guidance or interpretation regarding this Policy can be directed to the Management or designated officer.

It is the responsibility of all Senior Management, Department Managers and Team Leaders/Supervisors to ensure the functionality and accuracy of this Procedure is adhered to.

It is the responsibility of every employee to ensure the functionality and accuracy of this Procedure is adhered to.

It is the responsibility of the Top Management and the designated officer to ensure that a risk assessment and due diligence are conducted prior to the appointment of a third-party intermediary.

a. CCI Legal Entities:

The Board of Directors at CCI, the Chief Executive Officer, as well as the rest of the Top Management of CCI and of Group Legal Entities are responsible for creating a general risk culture in the organization and ensuring the oversight of the desired conduct. In this regard, they play an active role to enforce the standards described in this Policy.

CCI and all Group Legal Entities must appoint a person responsible for its Anti-Bribery and Anti-Corruption Program - the Local Anti-Corruption Officer; Group Legal Entities which do not have a Compliance function - due to their size - may appoint a joint Anti-Corruption Officer shared among all such entities or the role may be performed by the parent entity's Anti-Corruption Officer.

b. Group Head of Anti-Corruption:

The Group Head of Anti-Corruption of the Holding Company is responsible for:

- the design and implementation of the Group Anti-Corruption Program.
- supporting and monitoring on the implementation of Group Rules setting minimum Group standards on this matter.
- advice on, co-ordination and oversight of the Anti-Corruption Programs of the Group Legal Entities.
- providing advice on and opinions related to major Anti-Corruption matters.

c. Local Anti-Corruption Officer:

- Defining and implementing, the execution and the oversight of the local Anti-Corruption Program in line with the Holding program.
- Coordinating the activities directed to the correct application of the Group Rules related to Anti-Corruption, and, in accordance with all relevant local legal and regulatory requirements, proposing of any supplements as required, as well as.
- Guidance regarding advice on the local Anti-Corruption Program.
- Guidance to assist Employees with the performance of due diligence on anti-corruption issues including assessment of material gained during the due diligence exercise and advice on red flags.
- Oversight regarding the investigation of any reported acts of Bribery and Corruption, involving the Group Head of Anti-Corruption, whenever deemed appropriate. For this purpose the Local Anti-Corruption Officer shall have the power to investigate any suspected or actual cases of acts of Bribery and Corruption, to ask for and review all documents and to escalate any such cases to the local Chief Executive Officer or other relevant Board member and, if necessary, to the relevant Authorities.
- Translate into local language (when needed) and make publicly available/publish/communicate this policy through their official communication channels.

d. All Employees at the Group:

- All Employees are responsible for complying with this Policy, any corresponding local internal rules and procedures and all applicable anti-corruption laws in the performance of their duties.
- All Employees shall report to the Local Anti-Corruption Officer or the Local Head of Compliance any instances of actual or attempted acts of Bribery and Corruption they become aware of, whether the act of Bribery and Corruption is offered, given or received.
- Employees should be aware of Red Flags and, where they are seen, should be alert to the potentially increased risks, and contact the Local Anti-Corruption Officer or the Local AML Officer for advice. Any issues or concerns regarding an act of Bribery and Corruption should be brought to the immediate attention of the Local Anti-Corruption Officer according to the established internal process.
- Any report must be made according to the established internal process but in any case in the first instance to the Local Anti-Corruption Officer and, where actual or suspected money laundering is involved. Failure to make such a report may give rise to individual criminal liability on the part of the relevant Employee in certain jurisdictions, as well as exposing the Group to potential legal or regulatory action.

- Potential acts of Bribery and Corruptions may be reported also under the Global Policy – Whistleblowing.

IX- DEFINITIONS

Corruption: Corruption is the abuse of entrusted power for private economic gain. This Policy will refer to both as “bribery.”

Bribery: Bribery is the giving, offering or agreeing to provide benefits to others in order to improperly influence an outcome to obtain or retain an advantage. Bribery can take many forms, including the provision or acceptance of:

- cash payments
- phony jobs, shell companies, or “consulting” relationships
- kickbacks
- political or charitable contributions
- social benefits, or
- gifts, travel, hospitality and reimbursement of expenses

CCI employees are strictly prohibited from offering, paying, promising or authorizing, directly or indirectly, any financial or other advantage or benefit to foreign officials, candidates or parties for the improper performance (whether it be an act, omission, use of influence or otherwise) of a relevant function or activity.

X- DISCIPLINE

Any employee who violates the terms of this Policy will be subject to disciplinary action.

Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to company Management / the designated officer will be subject to disciplinary action.

Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action.

In all cases, disciplinary action may include termination of employment.

Any third-party agent who violates the terms of this Policy, who knows of and fails to report to Management / the designated officer potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

XI- TRAINING

All new employees will receive a copy of this Policy in their on-boarding packages.

All employees will receive an annual reminder and overview of the Policy during corporate training.

XII- IMPROPER PAYMENT PROVISIONS

Any payment or offer of payment to a foreign official for the purpose of influencing that official to assist in obtaining or retaining business or any other advantage for a company is strictly prohibited. A “payment” under the respective bribery and corruption laws is broadly interpreted to include not only the actual payment of money, but also an offer, promise or authorization of the payment of money, as well as an offer, gift, promise or authorization of the giving of “anything of value.” “Anything of value” may include not only cash and cash equivalents, but also

gifts, entertainment, travel expenses, accommodations and anything else of tangible or intangible value. Application of the law is not only to payments or offers to pay, but also to any act or event that is "in furtherance of" a payment to a foreign official. Even if an improper payment is not consummated, just offering it violates these laws. Likewise, it is a violation of these laws to instruct, authorize or allow a third party to make a prohibited payment on the company's behalf, or to ratify a payment after the fact, or make a payment to a third party while knowing or having reason to know that it will likely be given to a government official.

XIII- BRIBERY OF FOREIGN OFFICIALS

It is prohibited for the company and any of its employees, officers, directors and agents to directly or indirectly influence (with money, gifts, or promise) any foreign government, official, political party or political candidate in order to assist the company in obtaining or retaining business or in directing business to any other person. The company also proscribes the authorization or ordering of any practice which constitutes a violation of these prohibitions.

XIV- BOOKS & RECORD KEEPING REQUIREMENTS

In addition to its improper payment provisions, certain accounting requirements are imposed on a company. Specifically, it is required that a company maintains books, records and accounts that, in reasonable detail, accurately reflect the transactions and dispositions of that company. In order to comply with these requirements, it is imperative that company employees, officers and agents maintain complete and accurate records with respect to all transactions undertaken on behalf of the company. These requirements apply to transactions of any amount, not just sums that would be "material" in the traditional financial sense. "Records" include virtually all forms of business documentation, including accounts, correspondence, memos, tapes, discs, papers, books and other documents or transcribed information of any type.

XV- IMPROPER USE OF CORPORATE FUNDS OR ASSETS

The following uses of corporate funds or assets are prohibited:

- Direct or indirect payments, gifts, contributions or offers or promises of anything of value in bribes, payoffs or kickbacks or any other effort to buy favors, including but not limited to inducements to procure orders for the sale of company services and products. Any other direct or indirect payment, gifts, contribution or offer or promise of anything of value may be made only to the extent that it conforms with reasonably prudent practice in the industry, as approved in each specific case by a designated officer of the company. The giving of lawful customer discounts and allowances in the ordinary course of business is not prohibited, provided that such discounts and allowances are properly approved, documented, and accounted for.



Member of CCI Group

- Commissions, fees, or similar payments which are not reasonably related in value to the services rendered, or commissions, fees or similar payments made in exchange for services rendered which are illegal or in any manner violate this Policy.
- Direct or indirect contributions of money, property, or resources to the campaign of a candidate for office in the Government or in any national political party, other than as permitted by law.
- Use of assets, funds or resources of the company by employees or members of their family, which is personal, or not in furtherance of the business of the company.

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

CHANGE CONTROL

<i>Version Number</i>	<i>Effective Date Month. Year</i>	<i>Changes Applied (Brief Description)</i>
<i>CCIACP01</i>	<i>December 2022</i>	<i>N/A</i>
<i>CCIAP02</i>	<i>January 2026</i>	<i>Responsibility & Accountability</i>

END OF POLICY & PROCEDURES.