

A- INTRODUCTION

CCI expects its staff (including temporary, agency, interim, contractor or consultant staff) to be scrupulously impartial and honest in all affairs relating to the Company and their job within it. All staff also bear a responsibility as Employees to act as ambassadors for the Company in terms of their general conduct both within and outside the organization. This policy outlines the responsibilities of staff working for the Company.

B- PURPOSE

The purpose of this code of conduct is to:

Demonstrate the company's commitment to the highest standards of ethical behavior.
Encourage proper ethical conduct and sanction misconduct within the company; and develop an ethical culture based on such standards and conduct, led by the company's shareholders, directors, and management, and followed by all employees.

By adopting, following, and updating this code of ethics on a regular basis, together with the company's corporate governance code and charters, the company confirms its desire to demonstrably lead and promote good ethical behavior and corporate governance. To foster the confidence of its shareholders, employees, investors and the general public, this code of ethics goes beyond the legal and regulatory framework prevalent in Lebanon today and embraces both national and internationally recognized principles and practices.

The company's governing bodies and employees understand this code of ethics as their obligation and set forth to ensure that its spirit and provisions are respected and acted upon throughout the company and its subsidiaries and its business partners.

This code of ethics is reviewed and updated on an annual basis and published internally in booklet form and via the company's intranet site, as well as on the company's internet site.

C- THE COMPANY'S VALUES

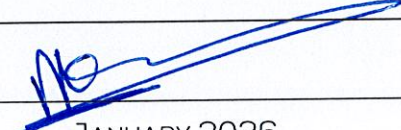
In all internal and external relationships, the company demonstrates its commitment to:

- Professionalism with all its business partners
- Customer orientation
- Employee empowerment
- Ethical practices with all stakeholders



CODE OF CONDUCT POLICY

VERSION NUMBER: CCICOCPO2

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NAME & TITLE OF APPROVER	MOHAMAD KARAKI – CCI GENERAL MANAGER
SIGNATURE OF APPROVER	
DATE APPROVED	JANUARY 2026

D- THE COMPANY'S ETHICAL PRINCIPLES

The company is committed to act ethically in all aspects of its business

The company's ethical standards are based on the following principles:

- Honesty
- Integrity
- Fairness
- Transparency

Similarly, the company expects the same in its relationships with all those with whom it does business.

The company's ethical standards focus on the following areas: employees, customers, relations with its business partners, government, society, and the wider community.

These ethical standards shall also apply to all business areas and for all subsidiaries both within and outside of LEBANON. All the company's ethical standards are based on:

- Respecting the rule of law, LEBANON laws and regulations, and showing respect for human rights.
- Managing the company's financial and operational performance to maximize the long-term value for its shareholders;
- Conducting business with integrity and fairness, renouncing bribery and corruption or similar unacceptable business practices, and not giving or accepting gifts and entertainment unless they fall under business custom, are immaterial and infrequent.
- Creating mutual advantage in all the company's relationships to build and foster trust; and
- Demonstrating respect for the community the company operates in, as well as for the natural

E- CODE RULES

1- ANTI-CORRUPTION:

- 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.

2- ANTITRUST AND COMPETITION:

- CCI is committed to the highest standards of business ethics, including fair competition and compliance with antitrust laws.
- When selling to public sector entities, CCI will support fair and open competition by complying with all laws and regulations related to government procurement, tenders, and bids. The company will not conspire with other partners, including but not limited to bid rigging, placing orders prior to tender finalization, price fixing, or other forms of collusion.

3- GIFTS AND HOSPITALITY

CCI requires its employees to ensure that gifts and hospitality offered by suppliers and potential suppliers of goods and services to the Company are declined. This applies, whether the gifts or hospitality are offered within, or outside normal working hours. All gifts must be politely refused or, if received through the post, returned to the donor with a suitably worded letter signed by your line manager.

4- TRADE COMPLIANCE LAWS & REGULATIONS

CCI is committed to protect its international trade business by complying with all applicable global export, import, and economic sanctions, laws and regulations. CCI transaction should be processed through the authorized channels and to follow the vendors trade process and regulations.

F- ETHICAL STANDARDS FOR THE COMPANY'S RELATIONSHIP WITH THE STAKEHOLDERS

1- EMPLOYEES AND OFFICERS

The company values its employees as the keystone to success. The company is thus committed to treating all employees with dignity, trust and respect, and to building a long-term relationship based on Lebanese labor law and the respect of human rights. The company will not employ child labor.

The company fosters teamwork, believing that diversity in talent, perspectives and opinions stimulate new and creative business opportunities and innovation. Similarly, the company renounces all forms of bureaucracy and excessive hierarchical structures that impede operational efficiency. CCI has an open-door policy for all employees to access and communicate with management and HR.

It is the company's policy to provide for and regularly improve upon a healthy, safe, and secure working environment for its employees. All employees are covered by the workmen compensation insurance policy, during working hours, for any accident that might occur.

Conflicts of interests can, or appear to, compromise the judgment or objectivity of the company's employees and officers. An appropriate policy and disclosure thereof have been developed to this extent.

The company is an equal opportunity employer. Its recruitment, promotion and compensation policy is based on merit and free of discrimination. Clear and transparent policies to this extent have been developed and put into practice.

Any kind of discrimination or harassment at the workplace will not be tolerated and contrary behavior properly investigated and dealt with through the human relations manager.

Employees are recognized and rewarded for their performance, based on performance objectives, and constructive and regular feedback through face-to-face meetings.

Rewards are given both at the team and individual level. The company has in place a training program, accessible to all employees, which encourages individuals to formulate personal development plans and provides for coaching, mentoring and formal skill-enhancing trainings.

The company sanctions the illegal use of confidential and insider information by all officers and employees and has developed a detailed procedure to effectively deal with this matter.

A regular consultation process between the company's employees and managers has been put in place to effectively deal with employment conditions and other issues that affect the employees work environment. A yearly survey is done by HR to all employees to collect their feedback on several aspects about their jobs, the management, Customer satisfaction is essential to the

company. Safe and quality products and services, fair pricing and appropriate after-sales service shall define the company's relations with its customers.

The company always seeks to deliver what it promises and the company.

These principles do not limit the right of the company to enforce discipline or to terminate workers in accordance with Lebanoni legislation.

2- CUSTOMERS

Customer satisfaction is essential to the company. Safe and quality products and services, fair pricing and appropriate after-sales service shall define the company's relations with its customers.

The company always seeks to deliver what it promises.

3- RELATIONS WITH ITS BUSINESS PARTNERS

The company believes that a long-term relationship with its business partners is founded on respect, trust, honesty and fairness is vital to its success.

The company will put forth its best effort to only cooperate with those business partners that share the company's ethical standards.

The company will respect the sanctity of contracts and business relations.

- Contractual negotiations shall be conducted based on mutual advantage.
- Business relations shall be based on high performance standards, delivering in a timely and qualitative manner and prompt settling of bills.
- In case of a commercial dispute, the company will strive to negotiate and compromise in good faith to reach an amicable solution.

The company is committed to complying fully with the Lebanon law(s) on anti-money laundering and only conducts business with reputable suppliers, business customers and other partners who are involved in legitimate business activities and whose funds are derived from legitimate sources.

4- GOVERNMENT

The company will pay all taxes that are owed and due, fully and in a timely manner.

The company abides by all federal and local regulations, including voluntary codes and guidelines, in both spirit as well as letter.

The company has also legally obtained all licenses required to do business.

The company seeks to build and manage a sound relationship with governmental authorities on an arm's length basis. No attempts to improperly influence governmental decisions shall be made, and the company will not offer, pay, solicit, or accept bribes in any form or shape, either directly or indirectly, in its dealings with the government, administration or courts. Transparent procedures regarding transactions engaged in by the company with any government agency or official, or in dealings with any company owned or controlled by a government agency or official, shall be established to this end.

The company will never make political contributions whether in cash or in kind.

The company should abide from any act of lobbying of Government Officials to cover sales and business development activities.

5- SOCIETY, ENVIRONMENT AND THE WIDER COMMUNITY

The company views itself as an integral part of the community in which it operates and is committed to a sound relationship built on respect, trust, honesty and fairness.

The company is committed to creating jobs and developing local talent when this is economically sustainable.

The preservation of the environment is of the utmost importance to the company. The company thus strives to minimize any disruption to the environment arising from its activities by reducing waste, emissions, and discharges, and by using energy efficiently. All unwanted paper at CCI is given to local organizations for recycling purposes.

All operations and activities will be carried-out according to the highest standards of care and in-line with internationally recognized principles.

G- IMPLEMENTATION

1- MEANS TO OBTAIN ADVICE

Many business decisions involve ethical dilemmas and require complex judgments to make the right choice. In cases of uncertainty, all officers and employees are expected to act responsibly and raise the ethical dilemma with their managers. Should this not lead to a satisfactory solution, the ethical issue is to be raised with a designated officer to obtain clarification. All officers and employees have the right to make confidential reports directly to the designated officer who in turn shall decide whether to report the matter to the audit committee to recommend appropriate action against any director or employee who acts in a manner inconsistent with this code of ethics.

2- PROCESSES AND RESPONSIBILITY

Each individual is responsible for his or her ethical behavior. The company has implemented a procedure for all officers and employees to regularly state that they understand and apply the provisions of this code of ethics. Adherence to this Code is further made obligatory as it is referenced in all employee contracts and linked to disciplinary procedures. A copy of this code of ethics is given to every employee on his or her first working day.

Department heads are accountable to the CEO and/or executives for implementing this code of ethics within their departments, ensuring that all officers and employees understand it, and for

providing assurance on compliance. The CEO and/or executives are in turn accountable to the Board.

The principles and provisions in this code of ethics have been integrated into the company's system of internal control. Rigorous and objective processes to measure performance, identify gaps and implement measures to address ethical gaps are regularly reviewed and modified. Willful or careless breach or neglect of this code of ethics will be treated as a serious disciplinary matter and can lead to the termination of employment.

The Board's audit committee periodically reviews and updates compliance with these principles and formulates proposals for the Board's approval.

3- TRAINING PROGRAM

The company offers an introductory ethics-training course once per year for all new officers and employees. This course offers practical examples of this code of ethics in action.

Periodic and specialized training courses are further offered to the company's officers and employees, as well as to the company's other stakeholders such as suppliers and other business partners, as part of the company's continuous professional education program.

4- ACCOUNTABILITY

CCI has standards and procedures for accounting and financial controls designed to ensure that records, books, and accounts are not used to conceal corruption or influence peddling. Incorrect or manipulated documents can be incriminating evidence against a company prosecuted for these offences.

To ensure that they are accurate, reference should be made to the list of accounting controls. These specific controls concern patronage operations, mission and reception expenses, the granting of discounts, purchases of services and image partnerships.

In any event, it is the responsibility of any employee who, during his or her duties, agrees to the payment of a service or the delivery of goods to ensure that the service or goods have been provided.

5- NON FINANCIAL CONTROLS:

Internal control is defined as a process, affected by an entity's board of directors (trustees), management, and other personnel, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations
- Reliability of financial reporting
- Compliance with applicable laws and regulations

They include a wide range of activities that occur throughout the organization, by supervisory and personnel. Typically, management is responsible for developing an appropriate system of internal controls, but every employee is responsible for following and applying these practices.

However, internal control system changes over time, once existing procedures become less effective, or perhaps are no longer applicable. Management must determine whether to make the necessary changes to the internal control system through updating the policies and procedures to be relevant and able to address newly identifies risks.

Below is a list of internal control activities adopted by the Company.

- Organizational Structure: the line of authority and responsibility is clearly defined so that employees know where to go to report performance of duties, problems and questions related to position and the organization.

- Segregation of Duties: A hierarchical structure of authority and responsibility has been developed at CCI. Tasks are divided and allocated to guard against one individual having the ability to make an accounting error (either knowingly or unknowingly). This protects the organization from any potential fraud or misappropriation of funds. In situations where there are an insufficient number of employees (due to budget constraints) a compensating control has been created.
- Authorization and Approval: Transactions should be authorized and approved to help ensure the activity is consistent with the company objectives which confirms that the person who approves transactions must have the authority to do so and the necessary knowledge to make informed decisions.
- Reconciliations: Performance reviews of specific functions or activities may focus on compliance, financial or operational issues. Reconciliation involves comparing transactions or activity recorded to other sources to help ensure that the information reported is accurate.
- Security: Security may be physical, information system or both. Equipment, inventories, cash, checks and other assets should be secured physically and periodically counted and compared with amounts shown on control records.

The accounting software is accessible to Finance and Accounting Department and designated employees in other companies and divisions. User ID & Passwords are required.

- Document Control: Ensure that all documents are captured by the accounting system, all documents must be initiated and dated when recorded and then filed appropriately. All documents will be archived securely and accessed only after having obtained necessary approvals.
- Records Retention: Provide an accurate and auditable record of all financial transactions, accounts and records are maintained in conformity with the company policy.

A- Responsibility and Accountability:

➤ The Board of Directors of the Company is responsible for:

- Setting the company expectation of internal control
 - Ensuring management is aware of those expectations
 - Requiring the upward communications channels are open through all levels of management
 - Evaluating management's effectiveness toward practicing an effective control environment
 - Implementing effective control policies and procedures
- **Managing Director, General Managers, CFO, Finance Manager, Accounting Manager** with delegated approval authority are responsible towards establishing, maintaining, and supporting the internal controls within their respective areas of responsibility and for creating the control environment that encourages compliance with the company's policies and procedures.
 - **Employees** in leadership roles are responsible for the application, design, and development of this policy.

- **Managers and supervisors** are responsible for strengthening internal controls when weaknesses are detected. They should periodically review departmental procedures to ensure that the general principles of internal controls are being followed. Those have the responsibility to ensure that those who report to them have adequate knowledge, skills, and abilities to function within, and to contribute to an effective internal control environment.
- **Adequate supervision** is necessary to ensure that internal controls are operating as intended, and to ensure their liability of accounting and operational controls by pointing out errors, omissions, exceptions, and inconsistencies in procedures.
- **Auditors are responsible** for reviewing the adequacy of internal controls and for reporting any weaknesses to management.

B- Internal Controls – Vendor & Customer

With respect to Vendor & Customer management the company has adopted the below:

- Company will conduct business activities with qualified vendors and customers only; concerned parties will prepare the customer and vendor profile files and present it to the management for approval. The files will include.
 - Vendor/Customer general information
 - Nature/ type of business
 - Legal entity form
 - Contact person details
 - Annual turnover data (if available)
 - Summary due diligence performed.
- Annually a general review of Customers and Vendors will be performed by concerned parties and identified issues (if any) will be reported. Management will review the report and propose actions to be taken.

C- Internal Controls – Projects

With respect to Project management the company has adopted the below:

- The Project/Account Manager will conduct a full extensive research/due diligence on any material project to be performed by the Company. The due diligence report will include:
 - Qualified customer profile
 - Project timeline and milestones
 - Input received from sales and technical teams with respect to completion objectives and timelines.
 - Communication with Vendor(s) offers received and valuations.
 - Summary highlighting risks and mitigation processes
- The report will be presented to top management for discussion, input, and approval.
 - Approve the Project – initiation of work.
 - Select Vendor(s) and approve terms as per set contract.
- Periodically, the Project/Account Manager will draft the Project Progress report and highlight:
 - Achieved milestones.
 - Customer/Vendor(s) issues, mishaps (if any).
 - Project completion plan, adjusted timeline (if any) and updated risk evaluation.
 - Major adjustments and new risks identified will be discussed and approved by management.

D- General Conduct

Employees should at all times conduct themselves in such a way as to enhance the reputation of the Company.

The Company will support employees who become aware of and are willing to report breaches of this policy or who genuinely believe that a breach is occurring, has occurred or is likely to occur within the business.

Employees should raise the issue internally with their manager or supervisor or in accordance with the Company's Policy on Disclosing Information ('Whistleblowing').

These standards of conduct are intended to underpin and clarify standards required by the Company of its employees and form a fundamental part of the employment contract.

Staff who fail to comply with the guidance detailed in this Policy could be subject, following full investigation, to disciplinary action up to and including dismissal.

If through their actions or omissions staff are found to be in contravention of either this Policy or, indeed, their legal responsibilities then the Company reserves the right to take legal action if it deems it to be necessary to do so.

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

H- 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>Template design</i>

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