

# Code of Conduct

Our company values and commitments

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# Code of Conduct

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## A message from our CEO

Dear fellow employees,

As Mobinil continues to grow, it is crucial that we maintain our leadership as the best and largest mobile service provider in Egypt offering the best quality service to our customers, the best working environment to our employees, top value to our shareholders, honest and transparent relationships with our suppliers, while proudly contributing to the development of our community. Our goal is to balance the needs of all stakeholders.

Our mission is what shapes our corporate culture. In turn, our culture should reflect an image of a company that acts with integrity with all of its stakeholders. Our image is one of our most valuable competitive advantages. To keep our competitive advantage we are committed to the highest standards of conduct in our dealings with all of our stakeholders: customers, employees, shareholders, suppliers, and our community.

To fulfill our mission, we must commit to responsible business practices. We are also committed to abiding by all laws and regulations. The way we conduct day-to-day business should be guided by our commitments, values, principles, and standards, which are presented in this code. The Code of Conduct is a tool that helps us continue to develop our desired corporate culture.

In conclusion, to remain a winning-team, we need to do the right thing, which is to be committed to the highest standards of conduct in all our dealings. To maintain our success we need to nourish an environment of trust and teamwork between all employees. As we continue to trust each other and to work together as one team, we will be able to continue building the future of our company while setting the standards for Egyptian Telecommunications and contributing to a better quality of life for our extended community. I count on each and every one of you to uphold Mobinil's values.

Yours sincerely,  
Yves Gauthier  
Chief Executive Officer

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## Objectives

The Code of Conduct outlines the shared set of values that should guide each and every Mobinil employee at any level, from the most junior to the most senior, in their day-to-day work and conduct. This set of values should be adopted individually by employees and collectively by teams, departments, and the company as a whole. Our company values are based on human values such as devotion to service, honesty, trust, cooperation, transparency, respect, and tolerance.

Objectives of this code are

1. To guide all Mobinil employees on how to incorporate our company values, commitments, and standards of behavior into their day-to-day work and into individual and corporate decision-making.
2. To align our behavior, actions, and decisions with our corporate culture; which is our shared set of values, expectations, standards and policies.
3. To create awareness of the Code through clear and accurate communication of our values, commitments, and standards, which would help improve organizational effectiveness and overall performance of our employees.

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## A message from our Vice President, HR

Dear Colleagues,

The Code of Conduct illustrates our values and the proper business conduct we are expected to embrace as employees working at a company seeking to maintain continuous success and leadership. The Code promotes a set of professional standards and behavior set to ensure a healthy, ethical, firm, and productive work environment.

We can all add value in what we do for our company if we comply with our standards of conduct, policies, and procedures that support our commitments and values. We should act with integrity and go beyond the bare moral minimum.

We need to nourish a company culture that emphasizes values and ethics when making a decision in order to always reach the best possible outcome for the company and its customers, employees, shareholders, suppliers, and the community as a whole. We strive to create a culture that encourages our employees to be proactive. This culture has no fear of raising legitimate issues, because it advocates doing the right thing and rewards honesty and integrity. Everyone should be approachable. This includes managers being receptive to their teams' concerns and employees accepting constructive direction and assessment.

Finally, I believe we all share the desire to maintain our company's success. Our hardworking employees who contribute every day to the success of our company deserve a warm thank you. By working together as one team, we will be able to continue to reach successful results. I encourage every employee to keep a high level of productivity, to always do the right thing, and to maintain a high standard of conduct in all dealings, actions and decisions.

Regards,  
Sherif Hanna  
VP, Human Resources & Administration

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## Mobinil's vision and mission

### **our vision statement**

Become the preferred communication services provider in Egypt.

### **our mission statement**

Providing the best customer experience, being a desired employer, creating value for our shareholders and proudly contributing to the development of our country.

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## Our 5 brand values

Mobinil is a reflection of our desire to be part of people's daily lives. The way we do things internally impacts our services and customers. Our values do not only reflect Mobinil's identity, but also shape our corporate culture.

Seek Excellence	<ul style="list-style-type: none"><li>Our passion to excel makes our customers at the heart of our business, offering them the best services and the best value for money.</li><li>We work professionally, push for quality, value loyalty and never settle for anything less.</li><li>We adopt the highest standards of service to each and every customer, internally or externally.</li><li>We continuously advance our professional knowledge and capabilities to maintain the competence required to provide top-quality results.</li></ul>
Friendly	<ul style="list-style-type: none"><li>We enjoy working and succeeding together by building good working relationships in a friendly and positive work environment.</li><li>We enjoy serving our customers and we are delighted when we make them happy and satisfied.</li><li>We treat everyone with the respect and dignity we desire for ourselves.</li></ul>
Dynamic	<ul style="list-style-type: none"><li>We are passionate about our business and we are committed to meeting the changing needs of our customers.</li><li>We are trend-setters in everything we do and we work passionately to bring the future to the hands of our customers in a fast-moving, high-tech telecommunications market.</li></ul>
Simple	<ul style="list-style-type: none"><li>We communicate with clarity and simplicity.</li><li>We are always straightforward and easy to understand.</li><li>We satisfy our customers in the most simple and convenient style.</li><li>We are committed to ensuring utmost efficiency in all our processes, to ensure we work smoothly and effectively.</li><li>We say simply and clearly what we do and we ensure that we do what we say.</li></ul>
Humane	<ul style="list-style-type: none"><li>We genuinely believe in our role to help create a brighter reality for our community.</li><li>We are proud to be a responsible corporate citizen caring for the public good.</li><li>The aim of our Corporate Social Responsibility programs is to give back to our community, provide a sense of hope, and bring out our humane side.</li><li>We have a responsibility to balance the needs of our stakeholders as well as meeting our social, ethical and environmental obligations.</li><li>Corporate responsibility is an integral part of our strategic planning and daily activities.</li></ul>

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## Commitment to our customers

Our business objective is to maintain our leadership in providing the best quality service and best value for money to our customers. We are committed to the highest levels of customer satisfaction by meeting our customers' needs, providing superior network quality and the widest network coverage, and offering a great customer service experience.

Respecting and satisfying customers	Mobinil promises to serve all customers who choose it as their preferred operator regardless of their age, gender, religion, ethnic background, or political affiliation. Aligning with our mission statement, we provide top quality service to our customers and achieve customer satisfaction. In meeting all our customers' needs, we treat them fairly and with respect. We serve our customers within the framework of our policies, procedures, and standards of conduct.
Being customer oriented	Our ultimate aim is not only to increase revenues but also to build long-term relationships and create a loyalty bond with our customers in order to sustain our success in the future. To do so, we provide customers with accurate, truthful, complete and consistent information concerning our products and services.
Protecting customer information	Customer information is strictly confidential. We safeguard customer information stored in our records and information systems in compliance with the Telecommunication Law no (10) for the year 2003 provided that it does not conflict with our national security and the strategic interests of our country. Customer information includes personal data and all details concerning their personal mobile transactions such as calls and messages. Failing to protect customer information not only reflects our inability to protect the trust given to us by our customers, but also damages our reputation as a company committed to providing quality customer service. Passing confidential customer data to any person other than the customer or any other party that is not specified by law is considered an invasion of the customer's privacy, which is illegal and unethical. Violations of confidentiality could subject the employee to formal disciplinary action including dismissal.

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## Commitment to our employees

Our employees are our most valued asset. Our ability to succeed depends on the integrity, knowledge, skills, diversity, and competent teamwork of our employees. We are shaping a challenging, fair, firm, and productive work environment, which emphasizes mutual respect and teamwork. We strive to reward high performance and we promise to be responsive to the needs of our employees. The company is committed to providing equitable compensation, excellent working conditions, and a fair atmosphere with great opportunities for professional growth.

Equal employment opportunity	Mobinil is an equal opportunity employer, we are committed to complying with the anti-discrimination law, and we pride ourselves with the Equal Employment Opportunity policy. All employment applications are considered on merit basis without regard to age, gender, religion, disability, marital status or political orientation.
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Tolerance and diversity	We respect others; tolerate our differences; and believe in the power of diversity. We strive to create a culture where tolerance and respect exist between employees. The diversity of people brings strength to our Mobinil team. Regardless of our differences in backgrounds, roles, age, gender, religion, or physical ability we all bring value to our company through our work. We shall tolerate and respect our differences and treat each other fairly.
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Respect	<p>We respect each and every person we interact with during our business dealings including customers, employees, suppliers, and all parties that have a business relationship with the company. We consistently treat others with the respect and dignity which we desire for ourselves.</p> <p>Mobinil employees should work in an atmosphere of mutual respect, participation, and trust, where their personal information remains confidential. We should be fair to our colleagues and avoid any conflict of interest that would result in benefits to one's self, while harming our fellow employees. In addition, open discussions are encouraged with our managers yet should be done in a respectable manner. However, we should not be forced to follow instructions that are unethical. The definition of unethical includes anything that is deemed illegal or against the company's best interest.</p> <p>We are also committed to protecting our customer-interface employees against the exceptionally rare exposure to unacceptable behavior on the part of customers. Tolerating illegitimate offence against our people not only hurts our employees' self-esteem but also jeopardizes the integrity of our employment practices.</p>
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Trust	Trust is what keeps people together. Integrity, competence, respect, consistency of performance and attitude, loyalty and open communication are what build and strengthen trust between people in the workplace.
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# Code of Conduct

Accountability	We carry out our responsibilities diligently. We are all accountable for the results of our performance, actions, and decisions. Accountability requires following all the standards, processes, procedures, and our superiors' instructions in order to get things done promptly and satisfactorily. It also requires that people clearly recognize the boundaries of accountability by being aware of job duties and responsibilities of various roles within our organization whether in the same department or across different functions.
Effective teamwork	Success comes along with synergy. We think, work, and win together. Teamwork is a key to organizational effectiveness. It enhances individual efforts, collaboration between employees, and strengthens relationships. Team efforts raise the level of productivity and help in effectively achieving work objectives. We promote synergy by seeking and examining different perspectives in an open manner to reach mutual agreement that benefits the whole organization.
Roles of managers and people managers	Managers and people managers are expected to lead their teams by example and according to Mobinil's business conduct standards that are highlighted in this code. Managers are responsible for nurturing open communication by listening to their employees. Managers need to coach, develop the skills, and empower their people. They need to regularly communicate company goals and objectives and the overall status of the company. Managers and people managers at all levels should demonstrate fair and responsible leadership practices through conducting impartial and objective appraisals for their subordinates. Good management will reflect positively on the performance and behavior of team members. In turn, this will reflect on job satisfaction and customer satisfaction.
Transparency and effective communication	We are open and objective in all our dealings. In order to maintain a competitive edge in our market, we need to interact, exchange ideas and respond effectively in all situations. All employees need to communicate honestly, accurately and regularly to ensure information flow between all departments. Upward and downward communication creates a culture of open communication. Employees are encouraged to express their concerns, ideas, and suggestions in order to have a say in shaping management's decisions. Information between departments or colleagues is to be shared on a need-to-know basis. In reinforcing a transparent culture, management is also committed to announcing any necessary policy/procedure updates and amendments to all employees through appropriate internal communication channels.
Health and safety	We are committed to providing a safe and healthy work environment for the purpose of protecting the health and safety of our employees. We should all develop healthy work habits as part of our daily work lives.

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## Commitment to our shareholders

Our commitment to our shareholders is to maximize our earnings and build long-term success responsibly. Maintaining a strong financial position depends on providing the best service to our customers. It is our responsibility to provide our shareholders with honest and accurate information about our financial position based on the Egyptian Stock Exchange laws and regulations. All of us as Mobinil employees are committed to preserving our company's assets, information and resources.

Protecting company resources and assets

We should treat and handle all of our assets, tangible and intangible, and resources with extreme care as if they were our own. We are all expected to make every effort to ensure that intellectual property and Mobinil's know-how are protected. We are accountable to our shareholders for safeguarding our company's assets.

Accurate financial reporting

As part of our commitment to accuracy in communication, we record all financial transactions according to the proper accounting rules and standards as required by Egyptian laws and regulations. Mobinil employees must refuse to engage in any arrangements with suppliers or intermediaries, such as over-invoicing, that might enable a sum given to another party to be hidden. All of our financial books and records properly account for all assets, liabilities, revenues, and expenses. Our financial statements reflect our financial position accurately and honestly. Mobinil complies with the rules and regulations of the Capital Market Authority and The Egyptian Stock Exchange.

To strengthen transparency in managing and protecting our financial resources, employees who have observed falsified financial data or behavior involving violations of financial reporting / accounting standards such as, illegally overstating or understating certain accounts, are encouraged to report those practices to the Internal Audit and Fraud dept or through any of our whistle-blowing channels. Reported allegations of misrepresentations and infringements in our financial records have to be substantiated with material evidence that supports the credibility of these allegations.

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## Commitment to our suppliers

We are committed to following the highest standards of purchasing and contracting practices that are based on quality, service, timeliness, and cost when selecting our suppliers, contractors, agencies, and consultants. The purchase of supplies, materials, and services must preserve the integrity of Mobinil's procurement process. We adopt no favoritism when selecting a vendor or any third party with whom we establish a business relationship. We should even avoid the appearance of conflict of interest by refusing to accept any gift, hospitality, entertainment, or favor since accepting any form of gift, hospitality, or entertainment could either influence or appear to influence the selection decision. Our employees are forbidden from engaging in practices involving conflict of interest such as receiving commissions. Our goal is to develop a long-term relationship with our suppliers, contractors, and consultants. This relationship should be built on honesty and fairness in all of our dealings.

Selection of suppliers	We follow the highest standards of purchasing and contracting practices, as described in our procurement process, which are based on quality, timing, price, trust, capability, and strategic fit when selecting our suppliers, contractors, and consultants. We encourage fair competition between suppliers of goods and services and we do not offer any preferential treatment.
Payments to suppliers	We are committed to honoring all payments for services rendered made for the amounts and in accordance with the terms specified in the approved contracts. We expect our suppliers and contractors to treat us similarly by delivering the requested services according to the agreed upon price, timing, and quality standards.
Protecting vendor information	It is our ethical and legal responsibility to protect our vendors' and contractors' information. It is unethical to pass competitive information regarding a specific vendor to the vendor's competitors, whether directly or indirectly through a third party or through implied indications. A vendor could mean a supplier, an agency, a contractor, a service provider, or a consultant.

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## Commitment to our community

We are a responsible corporate citizen not only in creating job opportunities, and contributing to the growth of the national economy, but also by adhering to the highest standards of business practices, and abiding by all laws and regulations in Egypt. We believe Mobinil plays a leadership role in our community by acting as a role model in its commitment to excellent customer service, and to a comfortable and healthy work environment. In addition, we are committed to following all Egyptian health and safety, and environmental standards, which are set in accordance with international standards. We are certified as an ISO 14001 company that is committed to providing maximum environmental protection to the local community. Mobinil promises that it will remain active in supporting many social and cultural activities in Egyptian society.

Relations with government	We are committed to adhering to the highest standards of business practices, and abiding by all laws and regulations in Egypt in all dealings with government personnel at all levels. Any employee should not offer any gifts or mementos, unless they are in the form of promotional or printed material and carry our Company's logo or brand names. Providing reasonable hospitality or modest entertainment in conjunction with business discussions is also considered acceptable as long as it does not exceed EGP 400. (Check the "Guidelines for Offering and Receiving Gifts" section). However, a Mobinil employee should never offer any gift in any format with the aim of encouraging an official to ignore his/her responsibilities or encouraging an official to exercise authority beyond his/her official role. What applies to Mobinil employees also applies to any intermediary contracted by Mobinil. In all cases, providing nominal gifts, hospitality, entertainment, or mementos will be done in the name of the company. Our courtesy should never influence the decision of the recipient and should not even imply asking for a special favor or treatment. If in doubt on what action to follow, please contact your Director.
Community activities	Mobinil plays a profound role in serving the community in which it operates. We have sponsored many charitable events to aid and empower the disabled and disadvantaged in Egypt. As part of our constant efforts to portray our true Egyptian essence, we fund social activities in order for us to attain a positive change in the community. We partner with local NGOs to address serious challenges faced by under-privileged communities. Our responsibility expands its reach to cover issues that truly matter to Egyptians in their day-to-day lives. Our enthusiasm not only has been evident through our engagement in the funding of education, health and environment related projects, but also through our efforts of spreading the spirit of volunteerism. Through volunteerism Mobinil was able to give our employees a chance to directly engage into the development of the community, and hence create a spirit of belonging and a sense of responsibility.
Environment	We are committed to producing high quality and safe services that comply with Egyptian regulations as well as international telecommunication standards. We work to understand people's concerns about the environment and health. We are committed to responsibly managing and minimizing our impact on the environment. We are committed to the ISO 14001 standards by establishing, implementing, and maintaining an environmental management system that complies with its requirements. We are keen to provide maximum environmental protection for the local community and we consider it one of our main responsibilities.

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# Code of Conduct

Healthy competition	We compete and win on the strength of our services and quality output of our people. We should neither disclose nor discuss confidential or competitive information at industry meetings. In case a Mobinil employee participates in a conference attended by representatives from our competitors, then he/she should not discuss matters of a competitive nature such as pricing, commercial plans, product launches, and potential or existing customers. Mobinil employees should never use improper means to gather information about our competitors.
Mobinil's non-involvement in politics & regulations on employee participation in the political process	Mobinil as an Egyptian operator does not endorse any specific political party or political organization. The company does not provide any financial contribution or in-kind donations to political causes or political parties. However, it is the individual's choice of Mobinil employees to engage in political dialogue outside our company premises and outside working hours.
Responsible Use of Corporate e-mail	Corporate e-mail facilities are intended to facilitate internal and external communication for business operations and to fulfill the company's business objectives. It is unacceptable to use company e-mail for sending inappropriate personal messages embracing political, religious, racist, or any other themes of controversial/sensitive nature that could be offensive, harassing, or otherwise unethical.

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## Conflict of interest

A situation involving a conflict of interest arises when an employee's personal interest competes with his/her professional obligations toward the company to the degree that the employee's ability to perform his/her duties in a fair, independent, and objective manner would be undermined. We should avoid such situations and be committed to performing our responsibilities with integrity and objectivity. If any employee faces a situation involving potential self-interest that conflicts with Mobinil's interest, he/she must seek guidance by reporting the matter to management. Our responsibility is to ensure personal interests do not jeopardize our commitment to our corporate values.

Transactions with suppliers or any third party	<p>Pursuing personal interests at the expense of professional and ethical behavior is deemed unacceptable. We should completely avoid favoritism in the selection of a supplier or any third party that engages in business with Mobinil. Our selection and business practices with third parties are expected to reflect integrity and fairness and conducted in compliance with our procurement standards and policies.</p> <p>Interacting with suppliers and contractors should be based on objective measures rather than subjective inclinations in order to curb any perception or appearance of favoritism and conflict of interest. Accordingly, we should refuse any gift, favor, or commission that might influence or would appear to influence our decisions. In case of doubt, the employee should discuss the matter with his/her manager and seek approval before any decision is made.</p>
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Confidential information	<p>Intentional or unintentional disclosure of confidential information in pursuit of private benefits and at the expense of the company's best interest is considered a conflict of interest. For instance, it is unethical for any employee who possesses restricted or confidential corporate information to use it in trading stocks (buying or selling) or to communicate the information to others who trade stocks. Company information, including that of customers or suppliers, is deemed confidential and is for use in the business domain only. Non-public information includes, but not limited to, Mobinil finances, changes to management, the Board of Directors, or shareholders of Mobinil, and information about signing or terminating major contracts. Thus, release of internal information that is not officially communicated to the public is strictly prohibited.</p> <p>Leakage or unauthorized disclosure of company information to the public in the course of academic research, press interviews, or any sort of social interactions especially with people employed by our competitors is deemed a breach of confidentiality and will be severely disciplined. Any desired use of Company information for non-business purposes entails authorization from your Department Director. We are all considered our company's ambassadors. Thus, we are expected to speak objectively and accurately about our company within these guidelines of confidentiality.</p>
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Outside employment	As per employees' contractual obligations, obtaining additional employment outside Mobinil's capacity represents conflict of interest in that the employee would be dedicating part of his/her time, effort, know-how, skills, and energy to work which is unrelated to the employee's work at Mobinil. Employees are encouraged to dedicate part of their time and effort to participate in charitable activities on condition that it does not conflict with Mobinil's best interest.
Guidelines for offering and receiving gifts	<p>The first objective of these guidelines is to ensure that our employees do not participate in corrupt acts such as offering bribes with the aim of circumventing or breaking Egyptian laws, regulations and ethical standards. The second objective is to ensure that our employees do not receive gifts in return for illegal or illegitimate favors.</p> <p>These guidelines cannot cover all the situations that a person may encounter, so you are expected to follow the spirit of these guidelines. If you face any grey areas, please do not hesitate to consult the Director of your department.</p>

## Offering gifts, hospitality and entertainment

- a. It is an acceptable business practice to offer, in the course of conducting business, a modest gift which does not exceed four hundred pounds in value. A modest gift, as a business courtesy, should be in the form of branded, promotional or printed material, such as agendas, calendars, or mugs that display our company's logo or brand names such as 'ALO'. In addition to Mobinil promotional items, it is also acceptable to offer, in goodwill, a symbolic, nominal gift such as flowers or a box of sweets or chocolates which does not exceed EGP 400 in value.
- b. Offering corporate hospitality and entertainment is a legitimate part of reinforcing our business relationships and strengthening our corporate image. Thus, it is an acceptable business practice to invite our Corporate Customers, Distributors, Dealers, and Points of Sales to working conferences and business trips at attractive locations. These conferences and trips comprise not only of business meetings but also leisure activities and offer valuable opportunities to exchange information on needs and expectations as well as relationship-building.
- c. The providing of reasonable hospitality or modest entertainment in conjunction with business discussions is also considered acceptable as long as it does not exceed four hundred pounds per person.
- d. The cumulative value of any offered corporate gift or hospitality to any person must not exceed four hundred pounds over the course of a calendar year. In case of frequent business dining with the same person representing the same entity, then the employee must obtain approval from the concerned Department Director.
- e. Offering any gift or hospitality will be done in the name of the company.
- f. Offering hospitality or a gift in the form of a Mobinil product which exceeds the threshold value to any party that has a business relationship with the Company requires the approval of the concerned Department Director.
- g. Offering gifts that are not in the form of Mobinil products and which value exceed the acceptable threshold (EGP 400) necessitates the prior approval of the CEO.
- h. In all cases, the employee offering a gift must submit to the concerned Department Director accurate records of its cost, its recipient, and the circumstances in which it was offered. The expenses entailed in offering a gift will be subsequently subject to the review and validation of the Finance Department. Our internal auditors shall eventually check all the expensed corporate gifts in their regular course of financial audit.
- i. A Mobinil employee should never offer any gift in any form with the aim of encouraging an official or a decision-maker to ignore his/her responsibilities or inciting an

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official to exercise authority beyond his/her official role. What applies to Mobinil employees also applies to any intermediary contracted by Mobinil.

## Receiving gifts, hospitality and entertainment

### Gifts of nominal value

- a. We can accept a nominal gift or memento, presented in goodwill on special occasions such as religious or national holidays or business events, only when it is provided in the form of branded, promotional or printed material, such as agendas, calendars, or mugs that display the logo of a corporation, supplier, dealer, or organization that has a business relationship with the Company. A nominal gift should not exceed four hundred pounds.
- b. We can also accept a symbolic gift in the form of flowers or a box of sweets and chocolates provided that its value does not exceed the four-hundred-pound threshold and is presented in goodwill.
- c. The accumulative value of all received corporate gifts from the same entity should not exceed four hundred pounds over the course of a calendar year.
- d. Receiving a nominal gift should not in anyway influence or appear to influence our decisions and actions when dealing with a customer, supplier, dealer, government official, or any external party engaging in a business relationship with Mobinil. We should not accept any gifts, regardless of their value, if they are perceived as bribes or implicit requests for favors, preferential treatment, or any form of illegitimate service. Thus, we are expected to exercise our common sense to reach a sound judgment regarding the motive for being offered the gift.
- e. Accepting an invitation to corporate hospitality that is associated with a business meeting is allowed only at the upper management level including Vice Presidents, Directors, and Heads of Departments.

### Gifts of substantial value

Accepting a gift of substantial value is totally prohibited. The employee should politely decline any offered gift of value that exceeds four hundred pounds regardless of its form in order to prevent the appearance of conflict of interest. Appliances, mobile handsets, discounts on products or services, lavish hospitality or any other privilege of financial value exceeding four hundred pounds are categorized as gifts of substantial value.

### Receiving invitations to events

Receiving corporate hospitality in the form of a trip, seminar, workshop, conference, symposium, or a training course requires the prior approval of the concerned Department Director since the value of such events normally exceeds the threshold of four hundred pounds. Therefore, if any supplier, dealer, agency, contractor, or any service provider directly extends an invitation to attend an event to an employee, either staff or managers, then the employee should notify in writing the Training and Development Deputy Director while copying his/her respective Department Director. The notification should explain the business reasons that make the event valuable for Mobinil to participate in.

The employee must report any invitation he/she receives for an event that is held in either Egypt or overseas, whether for free or at a discounted rate. In addition, the employee should report all costs associated with the extended invitation including accommodation and travel expenses.

The Head of the Training and Development department will jointly decide with the Vice President Human Resources and the concerned Director on whether or not to

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accept such an invitation, and who should attend in case of acceptance to ensure that the event is as beneficial as possible to Mobinil and that the business is not interrupted. All events either held in Egypt or overseas, are subject to the terms of our Training Policy.

## **Confidentiality of information**

We operate in a very competitive market and therefore we must all comply with our information security regulations in order to protect the business interests of our Company. Leaking information creates an atmosphere of distrust.

Our employees must use their common sense in protecting confidential information such as but not limited to corporate and departmental objectives and strategies, know-how, processes, information regarding our actual or potential customers, organizational structure, offers of employment, salaries, and all data related to employees, and undisclosed information such as corporate financial figures, proposals, projects, marketing plans, commercial data, and sales offers and promotions including prices and discounts.

We all should share information on a need-to-know basis. No one should share any confidential information with another fellow employee unless the latter is entitled to this information. Unnecessary or careless disclosure of confidential information can harm our company's best interests.

Disclosing confidential customer information is illegal and subjects the person who commits such a breach to legal liability; and consequently damages our reputation as a Company committed to protecting the trust given to us by our customers. It is our professional and ethical responsibility towards our customers to safeguard their personal and call information.

Only the Legal Department is authorized to supply customer data to official authorities upon receiving an official stamped letter indicating the District Attorney's decree or a court order.

Dealing with vendors and contractors demands that we protect sensitive information including those relating to other vendors. It is unethical to pass, directly or indirectly through a third party or through indirect hint, competitive information regarding a specific vendor to the vendor's competitors.

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## Where to go with problems/complaints

Employees are encouraged to bring forth their complaints and discuss them without fear with their direct supervisor. If the problem you have persists and no resolution is reached then you should escalate the matter by writing and submitting a grievance to your manager or your manager's superior if the conflict is with your direct supervisor/manager. A copy of the grievance should also be sent to Human Resources for follow up purposes. If all attempts fail at this point, the matter should be raised to a higher management level at your department, up to the Vice President or Director. If you are not satisfied with the Director's/Vice President's action or decision, then you should contact the Human Resources Department, where they will conduct the necessary investigation to establish facts. The conclusion of the investigation will be discussed with you and all the concerned parties. If the issue still remains unresolved, it will be escalated and reviewed by the CEO, whose decision will be final.

## Reporting misconduct

Any employee who becomes aware of any misconduct or unethical behavior that goes unreported is encouraged to report the matter to the Director of his/her department, or to his/her relevant Vice President. The employee can also select from any of the whistle-blowing channels to report a gross misconduct that is covered up. The employee can contact the CEO, the Vice President of Human Resources, the Internal Audit and Fraud Department, or the Ethics & Employee Relations Department. Employees are encouraged to approach top management with concerns and participate in creating a fair organization that operates with integrity and honesty. Information submitted by the employee should be supported by material evidence. Cover-up for any misconduct represents a conflict of interest. If any employee is proven to have committed wrongdoing, he/she will be subject to disciplinary action according to our disciplinary policy.

## Whistle-blowing channels

Employees are encouraged to use any of the whistle-blowing channels to report, without fear of retribution, serious cases such as internal control breaches, accounting violations that may have material impact on Mobinil's financial statements, unethical action that conflicts with the company's values and best interest, or fraud cases such as presenting fraudulent financial reports, embezzlement of funds, or inflating expenses to name a few.

Independent reporting ensures that conflict of interest is avoided and that objectivity, fairness, and impartiality are maintained. You can report accounting violations or internal fraud to the Internal Audit & Fraud team. The **People Share** form on the Intranet (<http://myintranet>) is also a tool provided by the Ethics & Employee Relations function at the Human Resources Department for you to freely raise your concerns and suggestions to management. Revealing or concealing your identity is your choice.

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## Complying with laws, regulations, and shareholders' ethical principles

Mobinil is committed to adhering to the highest standards of business practices, and abiding by all laws and regulations that we are subject to. Mobinil is also committed to complying with all corporate governance and internal control rules that we are subject to as well as all legal obligations as required by our shareholders: France Telecom Orange Group, and Orascom Telecom Holding. Mobinil is committed to respecting fundamental human rights and the principles drawn up by the International Labor Organization especially in regards to the ban on child labor and forced or compulsory labor. The Mobinil Code of Conduct fulfils the principles highlighted in the France Telecom code of ethics, and is consistent with FT Orange and Orascom Telecom's ethical guidelines.

## Commitment to the code of conduct

Mobinil's Code of Conduct constitutes a formal document which explains and communicates Mobinil's ethical framework of core values and standards of professional behavior. Accordingly, all employees are expected to comply with the letter and spirit of this Code as well as Mobinil's policies, procedures and regulations. Proven violations of the directives of this code by any employee may establish concrete grounds for formal disciplinary action as per our Disciplinary Policy. The objective is to maintain proper employee conduct, performance, and attitude.

It is impractical to cover in this code all the issues, situations and dilemmas that we may encounter. There are grey areas that require ethical reasoning and some common sense in order to reach the right decision. So we all need to follow the spirit of those guidelines. Each person should ask the question; "Will my integrity be questioned" or "Will the company's image be negatively affected by my actions or behavior."

## How to get help

If any employee has a question regarding the application or interpretation of this code, he/she is welcome to contact his/her manager or any member of the Ethics and Employee Relations team.

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