



CODE OF BUSINESS PRINCIPLES AND CONDUCT

ORASCOM CONSTRUCTION LIMITED



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INTRODUCTION

ORASCOM CONSTRUCTION LIMITED and its subsidiaries (the “Company”) is committed to conducting all business activities responsibly, efficiently, transparently, and with integrity and respect towards all stakeholders. Our values underpin everything we do and form the essence of the Company’s Code of Business Principles and Conduct (the “CBPC”), which should be read in conjunction with our Code of Ethics.

This CBPC contains the policies and principles that govern how each director, executive officer and Employee (collectively: “Employees”) of the Company is expected to conduct his or her self while carrying out his or her duties and responsibilities on behalf of the Company. Compliance with these principles is a condition of employment or engagement with the Company.

The CBPC supports our vision and strategic objectives of value creation for all stakeholders while protecting the triple bottom line of People, Planet, and Profit, and holds every Employee to the highest standards of business conduct.

The Company’s management team is responsible for the implementation of the CBPC and Code of Ethics. We apply these codes through an assurance system, which monitors our compliance, ensures all Employees are committed to our codes, and provides a safe and confidential procedure to raise any concerns and breaches. Any breaches must be reported in accordance with our *Whistleblower Policy*, which is available on the corporate website

We place great value on the CBPC, which is fundamental to our continued success.

This Code was approved and adopted by the Board and is available on the corporate website.

STANDARD OF CONDUCT

We conduct our operations with the highest standards of honesty, integrity, and fairness. We foster a business environment that protects the rights and interests of all stakeholders.

COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The Company and all its Employees are required to comply with the applicable laws, rules and regulations of the jurisdictions in which we operate.

EMPLOYEES

Our people are fundamental to the success of our business. We are committed to:

- Creating a positive workplace environment where there is mutual trust and respect towards and amongst Employees, with a shared sense of responsibility for our reputation and success.
- Equal employment opportunities where Employees are recruited, employed and retained based on their qualifications and experience regardless of race, gender, or religion.
- Providing training and development for all Employees to foster professional growth and

enrichment.

- Providing a safe and healthy workplace for all Employees by implementing the highest international safety standards.
- Maintaining an open line of communication across the Company and respecting the right of Employees to freedom of association.

Accordingly, we hold every Employee accountable for their conduct when carrying out duties and responsibilities on our behalf. Employees are expected to:

- Treat all individuals with respect, tolerance, dignity and without prejudice to create a mutually respectful and positive working environment. We will not tolerate any form of harassment or bullying.
- Endeavor to deal fairly with our customers, suppliers, competitors and Employees. We have a zero tolerance policy for manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.
- Take pride in their work, their workplace, and their professional development to further both their individual and our collective continued success.
- Respect and protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. All Company assets should be used for legitimate business purposes.
- Be safety, quality and environmental stewards. We train all Employees to implement the best sustainable practices, striving to meet or exceed international health, safety, quality, and environmental standards.

POLICY ON BILATERAL CONTACT WITH SHAREHOLDERS

The Company's policy is to provide all shareholders and other parties in the financial markets with equal and simultaneous information about matters that may influence the share price.

The interim and annual financial results announcements, other important announcements, and corporate governance documents concerning the Company are published on the Company's website.

The Company may engage in bilateral contacts with shareholders or prospective shareholders with the main objective to maintain an open and constructive dialogue with existing and prospective shareholders. These bilateral contacts may be initiated by either the Company or a (prospective) shareholder either directly or through brokers. Any contacts shall be conducted in principle by the investor relations staff, the Chief Financial Officer and/or the Chief Executive Officer. Other Company employees may also be involved in conversations with shareholders but only if agreed by and in presence of one of the above mentioned. The Company reserves the right to determine at its sole discretion whether it will enter into a bilateral dialogue with a shareholder or its representative. In this context the Company may, in order to assess whether a conversation could be in its interest, request shareholders to inform the Company in writing prior to the conversation of the goal of the conversation, the matters to be discussed and the opinion of the respective shareholders. In addition, the Company is entitled to hold conversations with shareholders dependent on their willingness to inform the Company on their interest (including derivatives and short positions) in the Company.



The Company is bound by rules and regulations on the disclosure of price-sensitive information and equal treatment of shareholders.

CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS

The Company strives to pursue mutually beneficial relationships with its customers, suppliers and business partners. We are committed to providing branded products and services at a consistently high level of quality to our customers. We seek to award business to suppliers and business partners who are committed to act fairly and with integrity towards their stakeholders, who have adopted and promote the implementation of our or equivalent business principles, and who observe the applicable laws of the country in which they operate.

FAIR COMPETITION

The Company is committed to the principle of free enterprise and seeks to compete fairly. The Company and our Employees adhere to laws and regulations which are designed to ensure effective competition.

COMMUNITY INVOLVEMENT

As a trusted corporate citizen, we strive to be a local company in each of its host communities, actively cultivating a local identity and employing local talent. We believe each community in which we operate plays an integral role in its success. Therefore, we have a vested interest in supporting the economic and social well-being of all stakeholders and communities by setting global good corporate citizenship standards, all while respecting local sensitivities.

The Company will regularly contribute to the economic and social development of our home and host communities, and expect all Employees to promote the observance of human rights in the countries where we operate. We endorse the principles set forth in the Universal Declaration of Human Rights (the "UDHR").

GOVERNMENT

The laws, rules and regulations applicable to contracting with government entities are complex and may impose different and special requirements on the Company. Failure to comply with these requirements may be a criminal offence. We strive to comply with these requirements and expect all Employees to do so. Questions regarding compliance should be referred to appropriate personnel or outside counsel as necessary.

PROTECTING THE ENVIRONMENT

The Company is committed to being an environmental steward by implementing the best technology available where applicable to minimise its environmental footprint and promote sustainable business best practices.

BUSINESS INTEGRITY

The Company conducts its business free from corruption and expects the same from its Employees and those with whom it does business. The Company and its Employees do not receive or offer tangible or



intangible bribes in any form. Any incidence of corruption in any form must be reported to the immediate or next higher level manager or the reporting officer in accordance with the Company's *Whistleblower Policy*.

Employees should avoid conflicts of interest between themselves and the Company and should declare possible incidences to their immediate or next higher level manager or the reporting officer in accordance with the Company's *Whistleblower Policy*. A "conflict of interest" can occur when the private interest of an Employee interferes in any way - or even appears to interfere - with the interests of the Company as a whole.

We reflect all business transactions accurately and fairly in its accounts in accordance with international established accounting standards.