



NSCE

C O D E O F C O N D U C T

NORTH SOUTH CONSULTANTS EXCHANGE

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Foreword

Acknowledging that 'the earth is what we all have in common', it is the corporate responsibility of North South Consultants Exchange (NSCE) to contribute to her sustainability today and for future generations. Sustainable development is only possible when we also foster decent labouring ethics, environmental protection, and a safe, healthy environment, that is free from fraud and corruption.

The actuality of sustainable impact on prosperity, economic growth, and the well-being of life and planet earth requires accountability to affected populations in our external actions from the standpoint of intersectionality but also demands to enhance our internal capacity, structures, and processes towards the cultivation of a sustainable reflex. Cross-cutting principles of ensuring social protection, fair power relations, non-discrimination, participation, equity as well as environmental-consciousness are always on the radar of NSCE's working ethics.

The NSCE Code of Conduct outlines the Sustainable Development Consulting firm's set of corporate values, ethical standards, procedures, and policies that are embedded within its thirty-five-year track record in Sustainable Development Cooperation.

NSCE assigns to the private sector a pivotal role to exert efforts to enhance innovative solutions in shared challenges and goals. Business responsibility is foundational for achieving a peaceful, equitable, secure, stable, affluent, resilient and sustainable lifeworld. NSCE conducts business in accordance with the laws and regulations and follows international guidelines and recognized principles for corporate responsibility.

NSCE integrates its ethical standards into existing policies aiming to implement them in our daily operations, management, and activities. The ethical standards can be seen in this Code of Conduct, our business strategy, operation manual, and policies. The following Code of Conduct provides an overview of the ethical principles across our business and service lines.

Dr. Zohra Merabet
Executive Director
North South Consultants Exchange



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1. Ethical Standards

LABOUR ETHICS

Principle 1: All forms of forced and compulsory labour and child labour are not tolerated within NSCE.

Principle 2: All employees should respect their colleagues' differences regarding race, ethnicity, nationality, sexual orientation, gender identity and expression, economic status, disabilities, religion and beliefs. Any kind of discriminatory behaviour, harassment, or any form of violence won't be allowed.

Principle 3: Employees should conform to the company's equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Principle 4: Protection of company property should be ensured at all times. All employees should treat the company's property, whether material or intangible, with respect and care. Employees should use them only to complete their job duties.

Principle 5: NSCE upholds high standards of professionalism and integrity. All employees must show integrity and professionalism in the workplace.

Principle 6: All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority, mentoring is encouraged.

Principle 7: Employees should follow their schedules, be punctual when coming to and leaving work, and avoid illegitimate absenteeism and tardiness.

Principle 8: Collaboration is a core value of NSCE. Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

Principle 9: All employees must be open to communication with their colleagues, supervisors, or team members.



COMPLIANCE WITH THE LAW

Principle 10: All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. Employees are expected to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Principle 11: NSCE and its internal staff should support and respect the protection of internationally proclaimed human rights.

Principle 12: NSCE and its internal staff should uphold zero tolerance concerning complicity in any form of human rights abuses.



ENVIRONMENT

Principle 13: NSCE supports a sustainable reflex throughout its operational procedures and all employees should integrate environmental concerns across consulting services and organisational procedures.

Principle 14: NSCE encourages its staff to undertake initiatives to promote greater environmental responsibility.

Principle 15: NSCE encourages its staff to raise awareness of the development and diffusion of environmentally friendly technologies and to use these technologies whenever possible.



ANTI-CORRUPTION

Principle 16: NSCE and its staff uphold zero tolerance concerning corruption in all its forms, including extortion and bribery. Accepting gifts from clients or partners is forbidden. Briberies for the benefit of any external or internal party are prohibited.

Principle 17: Employees are expected to avoid any personal, financial or other conflict of interest that might hinder their capability or willingness to perform their job duties.





NSCE governance is in accordance with the [Egyptian Labor Law #12/2003](#) and its amendments and the ministerial decrees. The Quality Management System of NSCE adheres to the seven principles of leadership, customer focus, relationship management, evidence-based decision making, engagement of people, process approach, and improvement for which it is awarded the ISO 9001:2015 Certificate. To ensure the Quality of the Management, NSCE has developed an Office Manual of the Company and Management Procedures Manual.

The **Health & Safety Policy** and **Anti-Harassment policy** aim to provide a safe working environment for all employees and persons of concern who might be affected by the Company operations. These policies have the purpose of safeguarding the health and welfare of employees according to the human rights principles under the responsibility of the NSCE Operation Support Unit (OSU).

NSCE has accelerated its efforts to environmental responsibility by developing a **Corporate Environmental Policy** to integrate efficient, environmentally friendly green solutions and technologies in combination with promoting responsible and efficient use of office materials, equipment, and resources at the company. Monitoring and evaluating the compliance with the policy falls under NSCE OSU's responsibilities.

In addition, the Company has in place an **Anti-Corruption Policy** to ensure compliance with all applicable anti-bribery and corruption regulations and freedom of all forms of corruption including extortion and bribery, aiming to conduct business in a socially responsible manner. The policy stipulates the referral mechanisms of the company, the monitoring and evaluation mechanisms and corporate responsibility. It is applied to NSCE's own operations, but also to the value chain considering clients, consortium partners, communities and other business relationships. NSCE OSU is responsible for following up on the implementation of this policy.

The Company has formalised the process to assess, review, and monitor the risk of violating the company's principles at the overall operational and project implementation level through weekly staff meetings. Results-based Management at NSCE is informed by the Collaborative Governance Model to enhance the participation of the value chain (employees, clients, communities, stakeholders, partners, etc.). This model is based on sustaining an effective and collaborative participatory and consensus-oriented management mode whereby communication is at the heart of this model. The model implies the values of direct personal face-to-face interactions, trust building, commitment, and mutual understanding and adheres to the principles of broad-based application, efficiency, effectiveness, accountability, participation, transparency, and learning.

Instructions:

All employees should read and follow NSCE's company policies. If they have any questions, they should ask their managers or Human Resources Officer at the NSCE Operation Support Unit.

Disciplinary actions:

NSCE may have to take disciplinary action against employees who repeatedly or intentionally fail to follow the company's code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include: Demotion | Reprimand | Suspension or termination for more serious offenses | NSCE may take legal action in cases of corruption, theft, embezzlement, or other unlawful behaviour.



2. Health & Safety Policy

It is the policy of North South Consultants Exchange (NSCE) to provide a safe working environment for all employees and persons who might be affected by Company operations. It is also our policy to safeguard the health and welfare of all employees. The standards of safety, health, and welfare practices will meet, and may well exceed, the minimum standards specified by the statute and codes of practice.

The responsibilities and arrangements for carrying out this policy are detailed below and failure to comply will result in disciplinary action which may lead to dismissal.

2.1. RESPONSIBILITIES

The overall responsibility for the Health & Safety Policy lies with the Executive Director, whose particular responsibilities are:

- (1) to authorise Company Health & Safety Policy Statements and revisions;
- (2) to authorise the allocation of financial, material and manpower resources for the implementation of the Health & Safety Policy.

2.2. IMPLEMENTATION

2.2.1. Operation Support Unit Manager

Responsibility for implementing the Policy within the Company lies with the Operation Support Unit (OSU) Manager who is the Health & Safety Officer for the Company and reports to the Executive Director. Their specific responsibilities are:

- (1) to ensure implementation of the Health & Safety Policy within the Company and at all locations;
- (2) to ensure workable monitoring systems are in place and routinely used;
- (3) to ensure safety procedures, practices and rules are regularly reviewed and updated;
- (4) to ensure that all staff, consultants, and subconsultants take all actions required for the implementation of this Policy at all locations;
- (5) to monitor the Health & Safety performance of all the staff and consultants.

2.2.2. Technical Unit Management

Within their areas of individual authority and responsibility, Technical Unit Managers and the Technical Unit staff, consultants and their subconsultants have a crucial part to play in implementing this policy. Their specific responsibilities are:

- (1) to monitor and support with guidance and training the Health & Safety performance of their teams;
- (2) to recommend specific safety procedures, practices and rules within their operation;
- (3) to investigate personally all serious incidents;
- (4) to liaise with NSCE where a joint response to safety is required;
- (5) to operate monitoring systems for Health & Safety performance.

In most instances, the Main Contractor on each location is responsible for providing a healthy and safe working environment and for advising NSCE and their location supervisors, of any barriers that prevent the successful implementation of this Policy.

2.2.3. All Employees

All employees have the following responsibilities:

- (1) to observe all Health & Safety Rules and Procedures;
- (2) to take responsibility for their personal safety and the safety of others through the adoption of safe working practices;
- (3) to report all accidents, hazards, near misses and dangerous occurrences and diseases;
- (4) to co-operate with all consultants and subconsultants in the implementation of this Policy.

2.3. ARRANGEMENTS FOR PROVIDING A SAFE WORKING ENVIRONMENT

2.3.1. Attitudes

Positive attitudes are fostered by a management style based on praise and encouragement from the directors of NSCE to all Consultants working for the Company. For each location, it is the responsibility of the consultant and any subconsultants to display all necessary Health & Safety announcements prior to commissioning and handover to ensure that all the required health and safety notices for safe operation are in position omissions from the Contract do not exempt the Contractor from this responsibility.

The importance of safe working attitudes is part of the induction training of all employees. Where unsafe attitudes to working persist on any location despite positive management initiatives NSCE has the right to take disciplinary action to correct the unsafe behavior.

2.3.2. Training

- (1) The training needs of all employees and consultants are identified through a formal and recorded appraisal process which highlights the needs of either the training skills or the technical knowledge necessary to implement the Health & Safety Policy.
- (2) Courses on safety and hygiene topics are developed or sourced by the Officer responsible for Health & Safety and implemented by trained personnel. A combination of internal material and external courses will be available.
- (3) Written Standard Procedures are available at all locations which specify Health & Safety requirements and standards.
- (4) All employees receive induction training covering all safety procedures in operation at each active construction location and each completed operational location.
- (5) Consultants and subconsultants and any employees of NSCE are responsible for ensuring that their teams attend any regular emergency drills in place at each location.

2.3.3. Consultation

- (1) NSCE will hold regular meetings with their staff and all consultants at each operational location, providing a forum for discussion and consultation on Health & Safety matters.
- (2) Safety specific notices are displayed at all locations.

2.3.4. Instructions

- (1) Manufacturers' safe usage, storage and disposal instructions for potentially hazardous products exist in locally held manuals.
- (2) Similarly, safe operating instructions for machinery and equipment are available for local inspection and eligible staff are trained before using machinery or equipment.

2.3.5. Safety Equipment & Materials

Where inspection requires special skills not available within the Company e.g. routine inspection of firefighting equipment, NSCE will engage appropriate external agencies.

2.3.6. Compliance

- (1) Insurance certificates are distributed to each project location for display in the location office or other appropriate location.
- (2) The designated Health & Safety Officer for all consultants is responsible for obtaining necessary statutory notices, record books, report forms etc., for each Branch.
- (3) The designated Health & Safety Officer for NSCE is responsible for obtaining necessary statutory notices, record books, report forms etc., for each commissioned plant that relates to its ongoing operation.

2.3.7. Hazards

- (1) Guidance on potential hazards in operation is available in the safe usage instructions available on location.
- (2) The Executive Director of NSCE will specify safe usage procedures where some element of hazard remains unavoidable. Such procedures will be based on manufacturers' instructions and industry best practices.
- (3) The skills of hazard spotting are an integral part of our approach to safety.

2.3.8. First Aid

All the necessary first aid facilities, equipment and arrangements required at any location will be provided as part of the contract. Consultants are responsible for maintaining adequate supplies.

2.3.9. Reporting

- (1) Accident Forms are issued to each location by the Health & Safety Officer of the contractor. Upon commissioning an accident book will remain on location to highlight the risks encountered during construction for the benefit of the operational staff.
- (2) The need to report the following is covered in the induction training of each new employee of North South Consultants Exchange and is the responsibility of all consultants to implement: Accidents | Near Misses | Diseases | Dangerous occurrences | Hazards
- (3) Where investigations require special skills or knowledge NSCE will authorise the use of external agencies.

2.3.10. Monitoring

- (1) Apart from day-to-day monitoring by all consultants, Health & Safety Performance in all operations is subject to audit by the senior management of North South Consultants Exchange, usually based on written audit or self-audit questionnaires.
- (2) Each individual is also allowed direct access to the Executive Director of NSCE should s/he wish to report a breach of the Health & Safety Policy.



3. Anti-Harassment Policy

The policy of North South Consultants Exchange (NSCE) is to have a zero tolerance for any forms of harassment, discrimination, or violence in the work place. Should any employee be subjected to what they perceive as any form of harassment discrimination or violence in the workplace; that employee shall follow the same procedure for filing a complaint for sexual harassment. All sexual harassment cases will be dealt with in accordance with Egyptian laws.

3.1. INTRODUCTION

It is the goal of NSCE to promote a positive workplace that is free of sexual harassment. This policy applies to all employees at all levels of NSCE. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organisation. Further, any retaliation against an individual who has filed a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve this organization's goal of providing a workplace free from sexual harassment, NSCE will not tolerate the conduct that is described in this policy and has provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees. Because the Company takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

3.2. DEFINITION OF SEXUAL HARASSMENT

The legal definition of sexual harassment is this: "sexual harassment" means any unwelcome sexual advances, requests for sexual favours, and/or verbal or physical conduct of a sexual nature when:

- (1) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions;
- (2) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

The definition of sexual harassment also includes, but is not limited to:

Direct or implied requests by a manager or supervisor | Sexual advances – whether they involve physical touching or not | Sexual epithets, jokes, written or oral references to sexual conduct | Displaying sexually suggestive objects, pictures, cartoons | Leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments | Inquiries into one's sexual experiences | Discussion of one's sexual activities

3.3. COMPLAINTS OF SEXUAL HARASSMENT

If any of our employees believe that s/he has been subjected to sexual harassment, whether by a manager, a supervisor, a co-worker, or any other person in the work environment, that employee has the right to file a complaint with our organization. This may be done in writing or orally. If s/he would like to file a complaint s/he may do so by contacting his/her Company Branch Office.

3.4. SEXUAL HARASSMENT INVESTIGATION

When we receive the complaint, we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. We will strive to release information arising out of a complaint or investigation only on a need-to-know basis. Employees should be aware, however, that information must be shared for an effective investigation to be conducted. Our investigation will include (but is not necessarily limited to) a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed sexual harassment. When we have completed our investigation, we will, to the extent appropriate inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation. If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

3.5. DISCIPLINARY ACTION

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment and may include such other forms of disciplinary action, as we deem appropriate under the circumstances.



4. Environmental Policy

Affirming the earth as our most valuable resource for decent life in providing us with air to breathe, water to drink, and resources for food and energy, North South Consultants Exchange (NSCE) considers environmental protection and climate action as a core commitment and component of its work ethic and everyday practices. Climate concerns such as biodiversity loss, soil erosion, air and water pollution, deforestation, ozone depletion, and plastic pollution provide the backdrop for NSCE to redirect the human impact on the environment and ecosystems towards sustainable development.

Integrating natural and water resources management and energy-efficient solutions in the nexus of improving environmental and human resilience are central to NSCE's mission with the objective of contributing to a green transition. NSCE prioritises this exchange of expertise, knowledge, ethics, and values with an eye for the humanitarian principles of ensuring social protection, poverty reduction, food security, gender equality and women empowerment, equity, inclusion, and accountability to affected people and vulnerable populations.

Based in Egypt, the company experiences first-hand the vulnerability of the region to the effects of climate change with rising temperatures, increasing timespans of drought and heat, and salination of water challenging the region's future needs. NSCE therefore considers the implementation of environmental-responsive actions and integrated management a vital necessity to limit the company's ecological footprint.

4.1. OBJECTIVES

NSCE identifies the following environmental objectives:

- (1) To integrate energy-efficient and environmentally green solutions in combination with promoting responsible and efficient use of office materials, equipment, and resources (including water, paper, electricity, etc.);
- (2) To encourage diffusion of environmentally friendly technologies;
- (3) To integrate environmental concerns in identifying business opportunities and decision-making practices;
- (4) To encourage the adoption of gender mainstreaming measures and the respect of humanitarian principles;
- (5) To promote environmentally responsible consultancy services such as integrated natural resources management, water resources management, integrated rural development and energy efficient and renewable energy management;
- (6) To promote environmental awareness on waste management according to the principles of recycle, refuse, reduce, reuse, repair, re-gift and recover and other waste reduction practices at the office and during project implementation;
- (7) To promote environmental awareness of fair trade products;
- (8) To promote digital solutions in place of physical transportation by providing means for video and internet conferences;
- (9) To purchase energy and power-saving appliances;
- (10) To enhance the eco-tourism sector.

4.2. MONITORING

Part of the scope of work of the Operation Support Unit (OSU) is to ensure that the employees' involvement, understanding, and implementation of NSCE's environmental policy objectives. This includes the Unit's responsibility to develop a manual on environmental-response instructions to employees. The company encourages the participation of employees in conferences and training on environmental issues to enhance their awareness.

5. Anti-corruption Policy



The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the consultancy business of North South Consultants Exchange (NSCE) is conducted in a socially responsible manner.

5.1. POLICY STATEMENT

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action that is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. NSCE takes a zero-tolerance approach to bribery and corruption. The Company is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

NSCE will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. Bribery and corruption are punishable for individuals, and a fine. If NSCE is found to have taken part in corruption, the Company could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore at NSCE take our legal responsibilities very seriously.

5.2. SCOPE

5.2.1 Who is covered by the policy?

In this policy, third party means any individual or organisation you come into contact with during the course of your work for NSCE and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

This policy covers: Bribes | Gifts and hospitality | Facilitation payments | Political contributions | Charitable contributions

5.2.2. Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

5.2.3. Gifts and hospitality

Employees must not offer or give any gift or hospitality: which could be regarded as illegal or improper, or which violates the recipient's policies; or to any public employee or government officials or representatives, or politicians or political parties;

Employees may not accept any gift or hospitality from our business partners if: it is in cash; or there is any suggestion that a return favour will be expected or implied.

Where a manager's approval is required above, if the manager is below the director level then approval must be sought from an appropriate Director. If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, the Company's Operation Support Unit (OSU) shall put in place a process to maintain a register of all such approvals.

5.2.4. Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.



Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- (1) Keep any amount to the minimum;
- (2) Create a record concerning the payment; and
- (3) Report it to your line manager.

In order to achieve our aim of not making any facilitation payments, each business of the Company will keep a record of all payments made, which must be reported to the Company Secretary, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

5.2.5. Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

5.2.6. Charitable Contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the compliance manager. All charitable contributions should be publicly disclosed.

5.3. YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your team leader OR the Company Secretary as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

5.4. RECORD-KEEPING

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. You must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

5.5. HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager OR the Company Executive Director.

5.6. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you tell the Company Executive Director or the confidential helpline as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.



5.7. PROTECTION

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

5.8. TRAINING AND COMMUNICATION

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

5.9. WHO IS RESPONSIBLE FOR THE POLICY

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Operation Support Unit (OSU) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries on its interpretation. Management at all levels is responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

5.10. MONITORING AND REVIEW

The Company Executive Director will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to NSCE OSU or the Executive Director. This policy does not form part of any employee's contract of employment and it may be amended at any time.



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