

Anti-Bribery & Corruption Statement

ADCB-Egypt is committed to high standards of ethical behavior and have zero tolerance towards bribery and corruption. ADCB-Egypt requires compliance with all anti-bribery and corruption laws that may be applicable in all markets and jurisdictions in which it operates. The policy incorporates the results of regular risk assessments and emphasizes that books and records must be fair, accurate, and kept in reasonable detail. ADCB-Egypt requires all employees, Directors and Associated Persons, to comply with the principles in the policy in the performance of their services for or on behalf of ADCB-Egypt.

ADCB-Egypt Program includes the following statement of overarching key principles: - All activity:

- Must be conducted without intent to bribe or corrupt;
- Must be reasonable and transparent;
- Must not be considered lavish or disproportionate to the professional relationship;
- Must be appropriately documented with business rationale; and
- Must be authorized at an appropriate level of seniority.

Furthermore, it is unethical, illegal, and contrary to ADCB-Egypt principles and good corporate governance to bribe or corrupt others, including to:

- Offer, promise, give or authorize others to give or agree with anyone else to offer, promise, give or authorize others to give, anything of value, directly or indirectly, to any party, or to influence any Public Official; or
- Solicit or receive anything of value, directly or indirectly, from any party; or
- Offer or provide a facilitation in order to obtain or retain business or otherwise gain an unfair advantage in business.

Third Party Risk: Third Party risk is the risk that a third party who provides services on behalf of ADCB-E engages in bribery or corruption while performing those services. ADCB-E prohibits bribery committed by third parties and joint ventures acting on its behalf.

As part of the prevention, identification and remediation of ABC issues, mandatory training is conducted throughout ADCB-Egypt, in addition to targeted training tailored to the roles of the individuals.