

Anglo Company Limited For Solutions

Aal Othman Street, Al Aqariah Buildings,
Building #3, Entrance 1 - El Hay El-Asher,
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www.anglo-company.com

VAT#: 754-760-049

Com Reg.#: 212722



أنجلو كومبني المحدودة للحلول المتطورة

شارع آل عثمان، عمارات العقارية،
مبنى رقم 3، مدخل 1 - الحي العاشر،
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تسجيل ضريبي رقم: ٧٥٤-٧٦٠-٠٤٩

سجل تجاري رقم: ٢١٢٧٢٢

Anglo Company Limited
Tax Reg. No.
754-760-049

Company Policies

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Company Policies

1. Privacy Policy

At Anglo Company Limited for Solutions, we are committed to protecting and respecting your privacy.

Our privacy policy explains what personal information we collect, why we collect it, how we use it, the control you have over it and how we protect it. This privacy notice applies to personal information we collect through our Anglo Company websites, or which is provided by you in person (for example when you visit our offices, exhibition stands or events).

It is important you read this privacy notice, together with any terms and conditions we may supply or make available to you from time to time. This privacy notice supplements the other notices and is not intended to override them.

By sharing your personal information with us, or by continuing to use our website & app, you confirm that you have read and understood the terms of this privacy policy. We take responsibility for the personal information we collect about you, and we aim to be transparent about how we handle it, and give you control over it.

For details on Anglo Company's Privacy Policy, please check list below.

1. Contact Us

If you have any questions, comments, or concerns about any aspect of this privacy policy, how we handle your personal information, or would like to make a complaint, please contact our Privacy Team for email at info@anglo-company.com or in writing at C/O The Privacy Team, Anglo Company Limited For Solutions, Aal Othman Street, Al-Aqariah Buildings, Building #3, Entrance 1 - El Hay El-Asher, Nasr City, Cairo, Egypt.

2. Changes to this privacy policy and your information

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back often to see any updates or changes to our Privacy Policy. It is important that the personal information we hold about you is correct and current. Please keep us informed if your personal information changes during your relationship with us.

3. Who are we?

For over thirty-five years, and counting, Anglo Egyptian has been elcometer's sole distributor of the coating's inspection, & laboratory equipment, in parallel with concrete inspection, and metal detection equipment to the Egyptian market with leadership.

Anglo Egyptian Trading is one legal entity, details of which can be found here. This privacy policy is issued on behalf of this entity so when we mention "Anglo", "Anglo Company", "Anglo

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Company Policies

Egyptian", "Anglo Company Limited For Solutions", "us", "we" or "our", we are referring to Anglo Company Limited For Solutions. So Anglo is the controller of your personal information either in our website terms, or when you buy a product or service from us. If you are attending our offices, the controller of your personal information will be the company running out of such offices. Where you attend an event, it will be Anglo that is exhibiting at such event or that is responsible for your country.

4. What Personal Information do we collect?

Our main reason for collecting your personal information is to supply the products or services you have requested from us and to improve the services, products, and experiences that you expect from us.

Personal information is defined slightly differently across the world. To guarantee your privacy and the protection of your information, we define it as any information that could be used to identify you or another living individual.

Through your interactions with us, you may share with us, or we may collect the following personal information:

- **Identity Data** - includes full name and title, username or other similar identifiers, gender.
- **Contact Data** - includes your address, country of residence, E-mail address, telephone number, fax number.
- **Financial Data** - Bank details and payment card details.
- **Employment Data** - includes certificates, qualifications, and employment history.
- **Transaction Data** - includes your order history, the products you buy and anything else related to your account or orders.
- **Technical Data** - includes the Internet Protocol (IP) address, your login data, browser type, time zone, data and time of interaction, browser plug-in types, operating systems, platform, and other technology on the devices you use to access the website or app.
- **Profile Data** - includes your username, password, feedback, survey responses.
- **Usage Data** - includes information about how and when you use our products, services, website, or apps.
- **Marketing Data** - includes your preferences in receiving marketing from us and your communication preferences.

In some circumstances, we will need that information to be able to provide you with a product or service that you have asked for; for example, we need your payment information when you buy a product, and your address to deliver it to you. Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide the information requested, we may not be able to perform the contract and in which case we may have to cancel the product or services you have with us, but we will notify you of this at the relevant time.

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If you share details of other people with us (for example, if you have bought a product from us for another person or if you register another person for our app), then you will need to check with that person that they are happy for you to share their personal information with us, and for us to use it in accordance with this privacy policy.

We also collect, use, and share anonymous data and aggregated data such as statistical data or demographic data for any purpose. Although such data may be derived from your personal information, it is not considered personal information as it does not directly or indirectly reveal your identity.

We do not collect any special categories of personal data about you (this includes details about your race, ethnicity, religious or philosophical beliefs, sexual orientation, political views, trade union membership, information about your health and genetic or biometric data).

5. How do we collect your information?

We use different methods to collect personal information from and about you, including through:

Personal interactions - you may provide us with a variety of personal information, including: your identity, contact, employment, and financial data when you attend our events, offices or correspond with us by post.

Electronic interactions - you may typically provide us with your identity, contact, customer data, financial data, transaction data, technical data and profile data, when you contact us by: our website, email, telephone, when you order products or services from us, request a quotation, set up a user account, subscribe to our service or publications, request marketing is sent to you, provide feedback to us, register your warranty, complete a survey, update your account information, download Anglo App, or ask for technical support through our website.

Automated technologies - when you interact with our website, send us an email, or use our apps, we may automatically collect your technical data, usage data, the internet address of the website from which you link through to our website and information on how you use our websites or apps. We use this information so that we can see how well our websites and apps are working, how they are used and what users look at most and to prevent automated spam.

We track our emails to review how you engage with them; including whether they are delivered to you, whether you open them, whether you choose to learn more about what is happening at Anglo (for example, by clicking on a link in our e-mail).

Analytics providers - we use Google Analytics on our site for anonymous reporting of site usage. We use the collected information to compile reports to analyze and further improve our site. We only use this information for statistical analysis purposes and then the data is

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removed. Google analytics use cookies as part of their analytical process, please see our cookies policy for more information about this and other cookies that run on our website. We do not currently respond to Do Not Track (DNT) signals.

Social Media Sites - you may use social media to contact us about your branded products, or to leave a review. We review publicly available social media and online sites to get a better understanding of what people are saying about us, and our products, technology, and services and to help consumers who prefer to contact us through social media. We only collect information about you that you have made publicly available on such sites (Facebook, YouTube, Twitter, LinkedIn, Instagram). We make sure any information we use is properly credited to its source or is made anonymous.

6. How do we use your personal information?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to follow a legal or regulatory obligation.
- To supply and improve the service, products, and experiences that you expect from us.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending electronic marketing communications to you or where we are required to transfer your personal information outside of Egypt in order to deal with your enquiry or request. You have the right to withdraw your consent to marketing at any time by contacting us or [How can you change the way that we contact you about our products, services, and support?], see below for further information on how to do this.

We have set out below, in a table format, a description of the ways we plan to use your personal information, and which legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

To process and deliver your order including: (a) manage payments, fees, and charges (b) collect and recover money owed to us	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
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To manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy (b) asking you to leave a review or take a survey	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests (to develop our products/services and grow our business)
To assist in any disputes, claims or investigations relating to your product or warranty matters	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to ensure good customer satisfaction)
To detect and prevent fraudulent transactions	Necessary for our legitimate interests
To provide support with technical issues	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to ensure customers are aware of updates to our products and systems and help grow our business)

7. Anglo contact promise

We would like to keep you posted, whether it is on our latest product announcements, upcoming events, or opportunities to test new products.

We do this in many ways, including e-mail, post, via social media platforms, throughout our Anglo app and by phone, but only if you are happy for us to do so.

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Ultimately, we want to make sure you are happy with the communications you receive from us. We therefore promise to:

- Only send you marketing communications when you have told us it is ok to do so.
- Only allow Anglo Approved Distributor in your country to send you marketing communications if you have told us, it is ok to do so.
- Never pass your personal information to anyone outside the Anglo or our Approved Distributor network for them to use for their own marketing purposes; and
- Give you the choice to stop receiving support or marketing communications at any time.

8. How can you change the way that we contact you about our products, services, and support?

You can change the way that we contact you in the following ways:

Opt-In/Start Contacting Me

If you had not previously asked us to send you marketing communications, you can ask us to start contacting you (sometimes called an "opt-in") by:

- Contacting Anglo saying that you would like to receive communications from us.
- If you have an online trading account, logging into your account and changing your preferences.
- Completing and returning our online [General Support Form](#).

Opt-Out/Stop Contacting Me

If you want to stop receiving marketing or support communications from us (sometimes called "opting out"), you can do so at any time by:

- Contacting Anglo or our approved distributor in your country saying that you no longer wish to receive such communications.
- Using the unsubscribe choice included in all our e-mail marketing and support communications.
- If you have an online trading account, logging into your account and changing your preferences.
- Emailing our privacy team at info@anglo-company.com

9. What personal information does Anglo share with third parties?

Most importantly, we never sell your personal information to anyone and only share it as outlined in this privacy policy or when you ask us to. In addition to the specific third parties set out below, we may share your personal information with third parties whom we may sell, transfer or merge parts of our business or assets to. If any change happens to the Anglo, the

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new owners or entities may use your personal information in the same way as other members of the Anglo.

10. Sharing within the Anglo Company

Most of Anglo's processes, procedures and systems are shared across Anglo Company offices, which means that we may need to share your personal information between us. We make sure that access to your personal information is limited to those of our staff who need it, and that all staff understand how and why we protect your personal information.

11. Third party service providers

We share your personal information with certain third-party service providers. They only have access to the personal information they need to perform those services. They must keep your personal information confidential and may not use it other than as we ask them to and always in accordance with this privacy policy. Those third-party service providers fall into the following categories:

- Approved Distributors, who help us to sell our products in certain countries.
- Those helping us to deliver products to you.
- Third parties that help us with mailing services, processing product purchases, financial services, IT technologies (e.g., data storage), security services and insurance claims.
- Professional advisers including lawyers, bankers, auditors, and insurers.
- HM Revenue and Customer regulators and other authorities.

Please note: If you buy a product from us, your card information is not held by us, it is collected by our third-party payment processors, who specialize in the secure electronic capture and processing of credit/debit card transactions.

12. International Transfers

Personal data in Egypt is protected by data protection laws but other countries do not necessarily protect your personal data in the same way.

We are working throughout the world, we also work with a global network of Approved Distributors so that we can provide dedicated support in your own country therefore your personal information may be transferred, stored, and processed outside of Egypt, we will only do this with your explicit consent. When you send your personal information to us, you will be asked whether you agree to this transfer, storing and processing. If you do not wish for your personal information to be treated in this manner, please do not tick the "I agree" box and do not continue with your query. If you continue with your query, then an automatic communication will be sent to the relevant member of Anglo or Approved Distributor (as applicable) who will be responsible for dealing with your query.

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Whilst we will take all steps reasonably necessary to ensure that your personal information is treated securely, we do not guarantee that the countries your information may need to be transferred to treat personal information with the same level of protection as is required by companies working within Egypt. You should also note that if you do not wish for your personal information to be transferred to a third country or third party then we may not be able to deal with your query.

A member of Anglo Company or Anglo approved Distributor will use your personal information to further your enquiry, provide you with information, products and services connected with your enquiry, and carry out any obligations arising from any contract entered into between you and a member of Anglo Company or an Approved Distributor.

If you would like further information about the global handling of your personal information, please contact us at info@anglo-company.com.

13. Other third parties

We will share your personal information if we must do so by law, including in response to a legal process, such as a court order or subpoena, or to comply with other national, state, provincial or local laws. If you would like more information on how we share your personal information, please email our Privacy Team at info@anglo-company.com.

14. Links to third party websites

We supply links to other websites such as our Approved Distributors which are not operated and controlled by Anglo Company. We have no control over and are not responsible for the content of those sites or how the third parties responsible for them collect and use your personal information. We do not endorse or make any representations about third party websites.

Third party websites usually have their own privacy policies explaining how they use and share your personal information. You should carefully review those privacy policies before you use these websites to make sure that you are happy with how your personal information is being collected and shared.

15. How long do we keep your personal information?

We only keep your personal information for as long as we need to, to be able to use it for the reasons given in this privacy policy, and for as long as we must keep it by law. The actual period for which we store your personal information will vary depending on the type of personal information and how it is used. For example, when you buy a product from us, we will store information about you and your purchase for at least the term of your warranty or guarantee.

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16. Your controls and choices

You have the right to access, update and amend personal information that we hold about you; you can do that in relation to some of your personal information if you have an online account. If you would like to change the way that we contact you, see the section above titled 'How can you change the way that we contact you about our products, services and support?'

In certain circumstances, you can also:

- Ask to access your personal information.
- Ask us to correct your personal information.
- Request erasure of your personal information.
- Object to our processing of your personal information.
- Ask us to limit or restrict our use of your personal information.
- Ask us to remove or cut your personal information; or
- Ask us to supply your personal information to a third-party provider of services.

Please note that those rights do not always apply and there are certain exceptions to them. We will also need to confirm identity before acting on certain requests.

If the law in your country allows us to impose a fee for giving you access to your personal information, or to exercise any of your other rights in relation to your personal information, we will let you know. If you would like to exercise any of your rights in relation to your personal information, please email info@anglo-company.com.

17. How do we protect your personal information?

We are committed to protecting your personal information. We use proper technical and organizational measures, including encryption, to protect your personal information and privacy, and review those regularly. We protect your personal information using a combination of physical and IT security controls, including access controls that restrict and manage the way in which your personal information and data is processed, managed, and handled. We also ensure that our staff are adequately trained in protecting your personal information. Our procedures mean that we may occasionally request proof of identity before we share your personal information with you.

18. Children

Anglo's websites, apps and products are not directed at children. We do not knowingly collect any personal information from children. If you are a child, please do not try to become a registered user of our websites, apps or products or otherwise provide us with any personal information. If we learn that we have inadvertently obtained personal information from a child, we will remove that information as soon as possible.

If you are aware of a child who has supplied their personal information to us, please contact us at info@anglo-company.com.

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19. Translations of this privacy policy

This privacy policy has been translated from English into the official language of a number of different countries. We have done this to make sure that the policy is clear and accessible to all users of our websites and apps.

If there are any conflicts or inconsistencies between the translated versions of this privacy policy, the English version will prevail.

This privacy policy was last reviewed and updated in October 2022.

Access your information	You can ask for access to and a copy of your personal information and can check we are lawfully processing it
Correction	You can ask us to correct any incomplete or inaccurate personal information we hold about you
Erasure	You can ask us to drop or remove your personal information where: <ul style="list-style-type: none">• There is no good reason for us continuing to process it.• You have successfully exercised your right to object (see below).• We may have processed your information unlawfully; or• We must erase your personal information to comply with local law. We may not always be able to follow your request for specific legal reasons, which will be notified to you at the time of your request.
Object	You can object to the processing of your personal information where: <ul style="list-style-type: none">• We are relying on our legitimate interest (or those of a third party) as the basis for processing your personal information, if you feel it effects on your fundamental rights and freedoms.• We are processing your personal information for direct marketing purposes. In some cases, we may prove that we have compelling legitimate grounds to process your information which override your rights and freedoms, and, in such circumstances, we can continue to process your personal information for such purposes.

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Restrict processing	<p>You can ask us to suspend or restrict the processing of your personal information, if:</p> <ul style="list-style-type: none">You want us to set up the accuracy of your personal information.Our use of your personal information is unlawful, but you do not want us to erase it.You need us to hold your personal information (where we no longer need it) as you need it to establish, exercise or defend legal claims; or <p>You have objected to our use of your personal information, but we need to verify whether we have overriding legitimate grounds to use it.</p>
Request a transfer	<p>You can request a transfer of your personal information which is held in an automated manner and which you provided your consent for us to process such personal information or which we need to process to perform our contact with you, to you or a third party. We will supply your personal information in a structured, commonly used, machine-readable format.</p>
Withdraw your consent	<p>You can withdraw your consent at any time (where we are relying on consent to process your personal information). This does not affect the lawfulness of any processing carried out before you withdraw your consent.</p>

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Company Policies

2. Anti-Bribery Policy

Purpose

This policy sets out the responsibility of Anglo Company Limited For Solutions as a corporate entity (including all subsidiary businesses wherever located), and all employees of Anglo Company Limited For Solutions and its offices around the globe (hereafter referred to as the "Group") in observing and upholding the Group's position on bribery and corruption.

It also provides information and guidance to all employees of the Group on how to recognize and deal with bribery and corruption issues.

Policy Statement

It is the Group's policy to conduct all business in an honest and ethical manner. A zero-tolerance approach to bribery and corruption is taken by the Group and it is committed to acting professionally, fairly and with integrity in all dealings wherever it operates. The Group is committed to implementing and enforcing effective systems to counter bribery.

Legislation

In addition to the broad definition of bribery under Egyptian Law, the Egyptian Legislator expanded the crime by adding more acts, such as a public officer who commits the act without being competent in the duties but alleged to be competent or wrongly assumed competency. Moreover, the act is punishable by law, even if the public officer was not aiming to perform his duties at the time of requesting, accepting, or taking the interest. If the consideration of said interest is to omit the public officer's duties or to act contrary to them, the fine by which the crime is punishable shall be doubled.

Furthermore, the act of a public officer accepting a reward for a duty or action undertaken without any prior agreement, as well as the act of a public officer performing his duties due to or as a result of external influence or recommendation, are both punishable by law through imprisonment and a fine.

Alternative forms of bribery in relation to Board Members and managers of joint-stock companies or associations have been added to the bribery section of the Penal Code and are punishable by imprisonment of up to seven (7) years, in addition to a fine that may reach the value of the promise or gift.

The Egyptian Legislator criminalized all such acts and specified harsh sanctions due to the severity of bribery; the aforementioned sanctions are applied against the bribe offeror, offeree, and mediator. Nevertheless, Egyptian Law stipulates the exemption of the bribe offeror and mediator, in the event of informing the competent authorities, or in the case of confession.

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As such this applies as much to Anglo Company Limited For Solutions' overseas offices as it does to the Egypt business.

Who is covered by the policy?

This policy applies to all employees (whether permanent, fixed term or temporary), consultants, contractors, agency staff or any other person providing services to the Group (collectively referred to as "workers" hereafter).

What is bribery?

A bribe is a financial or other advantage offered or given to a person in order to gain a commercial, contractual, or personal advantage. (For the avoidance of doubt, this does not include discounting of product).

Under the Bribery Act, it is an offence to bribe another or to receive a bribe. In addition, however, no money needs to have changed hands for people to be caught under the Act – a person can be guilty of an offence if they offer/promise to pay or request/agree to receive a financial or other advantage.

Gifts and Hospitality

The Group will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence any commercial or public official in the performance of their duties.

The Group will not make contributions of any kind to political parties and no charitable donations will be made for the purpose of gaining any commercial advantage.

This policy does not prohibit the giving and receiving of promotional gifts of low value and normal and appropriate hospitality. As stated in Anglo Staff Handbook however, the offer of gifts or entertainment in excess of \$50 must not be accepted without the prior approval of a Director.

Gifts or hospitality given or received must be reasonable and justifiable. The following points are intended as guidelines in this respect:

- Gifts or hospitality are not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits.
- It is not an unlawful gift.
- It is given in the name of the business and not in an individual's name.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It is appropriate in the circumstances (for example, small gifts given at Christmas time).
- Considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
- It is given openly, not secretly.

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Record-keeping

The Group will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

Workers must ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the expenses policy in force at each business and must specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties such as customers, suppliers and business contacts must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

Workers' responsibilities

All workers must ensure that they read, understand, and comply with this policy at all times.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Group or under the Group's control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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.

Raising Concerns

Workers are encouraged to raise concerns to a Company Director about any issue or suspicion of malpractice at the earliest possible stage.

No worker will suffer any detrimental treatment as a result of either refusing to take part in bribery or as a result of raising genuine concerns about bribery, even if these turn out to be mistaken. (Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern).

Monitoring

The Board of Directors has overall responsibility for ensuring the effectiveness of this policy.

Internal control systems and procedures will be subject to regular audits to provide assurance that these are effective in countering bribery.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

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3. Ethical Procurement Policy

As an international organization, Anglo Company Limited For Solutions sources products and components from around the Globe. Our environmental and anti-bribery policies clearly state our position on these two very important issues and go some way to set out our position on how we conduct our business in a sustainable and ethical way.

This Ethical Procurement Policy has been written to further describe how we conduct business with our suppliers, together with the expectations that we have of our suppliers regarding the way that they conduct their business and applies to all purchases of goods and services.

Our aim is to ensure that the whole of our supply chain conforms to our ethical procurement standards.

As a leading supplier of inspection equipment, we understand that our reputation does not simply rest with the quality and service we offer to our customers. We have a duty to ensure that we strive to maintain the highest standards of ethical conduct and corporate responsibility worldwide and seek to influence our suppliers to operate to similar high standards as ourselves.

We support the principles set out within the United Nations Universal Declaration of Human Rights and the principles set out in the Dodd Frank Wall Street Reform and Consumer Protection Act, Section 1502 with regards to the use of conflict minerals.

Anglo Company will:

- Expect all our employees to adhere to our environmental, anti-bribery and ethical procurement policies.
- Pay suppliers in accordance with the agreed terms and deal with exceptions in a timely manner.
- Ensure that we will not knowingly purchase product(s) which contain metals derived from minerals defined as 'conflict minerals.' conflict minerals include columbite-tantalite (coltan, niobium and tantalum), cassiterite (tin), gold, wolframite (tungsten), their derivatives or other minerals determined by international governments to be financing conflict.
- Ensure an ethical basis to business practice.
- Select and treat our suppliers fairly and objectively at all times.
- Seek to ensure that our environmental, anti-bribery and ethical procurement policies are considered in our supplier appraisal process.

We expect our suppliers to:

- Conduct business without the payment or receipt of inducements, unlawful incentives or other benefits that might be considered an attempt to influence decision makers.
- Respect fundamental human rights.
- Treat employees fairly, never abuse or threaten them and never use forced, bonded or child labor.

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- Maintain a safe working environment at all times and provide access to protective equipment and safety training for all employees.
- Confirm they understand and respect our environmental, anti-bribery and ethical procurement policies.
- Maintain effective policies, processes, and procedures to manage their environmental impact and to operate their business in a sustainable way.
- Ensure that they do not purchase products which contain metals derived from conflict minerals.
- Comply with all applicable local, national, regional, and international laws, regulations, and directives at all times; and
- Respect the intellectual property rights of others.

Monitoring

The Board of Directors has overall responsibility for ensuring the effectiveness of this policy.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

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4. Environmental Policy

Protection of our environment is an integral part of Anglo's activities. We take a responsible approach to environmental management throughout our Company, with our Board of Directors being responsible for our environmental performance.

We are committed to the achievement of the expectations of our customers and stakeholders through the alignment of our environmental objectives to our program of continuous improvement in order to reduce our total impact on the environment.

- All relevant compliance obligation requirements are met
- Environmental performance is monitored and reviewed on a regular basis
- Any emissions to air, releases to water, energy usage or disposal of solid waste to landfill does not cause unacceptable environmental effects
- Our business is conducted in a way that respects our neighbors.

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5. Modern Slavery & Human Trafficking Statement

Anglo Company is absolutely committed to preventing slavery and human trafficking in all of its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

5.1. What is Slavery and Human Trafficking?

Slavery:	Exercising powers of ownership over a person
Servitude:	The obligation to provide services is imposed by the use of coercion or force
	Forced or compulsory labor: Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking:	Arranging or facilitating the travel of another person with a view to their exploitation

5.1.1. Modern Slavery and Human Trafficking legislation in the main covers four activities.

5.1.2. This policy covers all four activities.

5.2. How is it relevant to us?

5.2.1. Modern slavery is a complex and multi-faceted crime and tackling it requires all of those working for Anglo Company to play a party. At first glance, this whole subject may appear irrelevant to Anglo Company, but it is highly relevant, and we must all be vigilant.

5.2.2. At a very basic level, preventing the exploitation of people and human trafficking, and protecting our workforce and reputation makes good business sense.

5.2.3. Modern Slavery legislation recognizes the important part businesses can and should play in tackling slavery and encourages them to do more.

5.2.4. With this in mind, we need to pay particularly close attention to:

- Our supply chain
- Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- Cleaning and catering sectors and suppliers
- Corporate hospitality

5.3. Responsibilities

5.3.1. Anglo Company, managers and colleagues all have responsibilities to ensure that our fellow workers are safeguarded, treated fairly and with dignity.

5.3.2. Everyone must observe this policy and be aware that turning a blind eye to modern slavery and human trafficking is not acceptable and not an option.

5.3.3. The Company will:

- Maintain clear policies and procedures which help to prevent exploitation and human trafficking, both in our organization and in our supply chains, and which protect our workforce and our reputation.
- Be clear about our recruitment policy.
- Conduct checks within our supply chains and vet new suppliers.
- Lead by example by making appropriate checks on all employees, and recruitment agencies, to ensure we know who is working for us and with us.
- Ensure we have in place an open and transparent grievance process for all staff and operate a straightforward reporting procedure to deal with any concerns raised.
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare and the welfare of individuals working in our industry.

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Company Policies

- g) Make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibility to our employees and our customers seriously

5.3.4. Managers will

- Listen and be approachable to colleagues.
- Respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation
- Remain alert to indications of slavery (see identifying slavery below)
- Raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do.
- Use their experience and professional judgement to gauge situations and respond appropriately.

5.3.5. As Colleagues, We all have responsibilities under this policy. Whatever your role or level of seniority, you must

- Keep your eyes and ears open, if you suspect someone (a colleague or someone in our supply chain) is being controlled, coerced, or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery).
- Follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.
- Tell us if you think there is more, we can do to prevent people from being exploited.

5.4. The Risks

5.4.1. The principal areas of risk we face, related to Modern Slavery and Human Trafficking, include:

- Supply chains.
- Recruitment through agencies.
- General recruitment.
- Customers engaged in hospitality, cleaning, and catering industries.

5.4.2. We will manage these risk areas through our procedures set out in this policy.

5.5. Our Procedures

5.5.1. Anti-Slavery statement

- 5.5.1.1 We will make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our customers seriously.
- 5.5.1.2 We will publish this statement on our website.
- 5.5.1.3 Our historic statements will remain available on our website.
- 5.5.1.4 Anglo Company's statement will set out the following matters:
 - Anglo Company position in relation to the global market
 - The sectors within which it is active
 - Details about our supply chains
 - The key risk areas we face and our approach to avoiding and preventing Modern Slavery and Human Trafficking
 - The action we have taken to ensure that the potential for slavery and human trafficking is significantly reduced both with our suppliers, employees, and contractors
- 5.5.1.5 We will continue to tell the companies we do business with that we are not prepared to accept any form of human exploitation.
- 5.5.1.6 We will ensure that all our supplier contracts contain anti-slavery and human trafficking clauses. The clauses, which flow down through all layers of our supply chain, will prohibit suppliers and their employees from engaging in slavery or human trafficking.
- 5.5.1.7 We will ensure that we can account for each step of our supply process, and that we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:
 - Mapping our suppliers.
 - Risk assessments for suppliers and questionnaires for new and existing suppliers.
 - Supplier audits.

5.5.2. Recruitment

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6.5.2.1 Using agencies

- a) Our HR departments will follow company policy and only use agreed specified reputable recruitment agencies. We will thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - I. Conducting background checks and investigating reputation
 - II. Ensuring the staff provided have the appropriate framework (e.g., work visas)
 - III. Ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying
- b) We will conduct regular reviews of agents used.

5.5.3. General Recruitment

- a) We will ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- b) We will ensure staff are legally able to work in Egypt.
- c) We will the names and addresses of our staff (a number of people listing the same address may indicate a high shared occupancy, often a factor for those being exploited).
- d) We will provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the recruitment team will follow our reporting procedures (See Reporting slavery).

5.6. Identifying Slavery

- 5.6.1. There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:
 - a) The person is not in possession of their own passport, identification, or travel documents.
 - b) The person is acting as though they are being instructed or coached by someone else.
 - c) They allow others to speak for them when spoken to directly.
 - d) They are dropped off and collected from work.
 - e) The person is withdrawn, or they appear frightened.
 - f) The person does not seem to be able to contact friends or family freely.
 - g) The person has limited social interaction or contact with people outside their immediate environment.
- 5.6.2. A person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the persons' circumstances which may indicate something is not quite right.
- 5.6.3. If you have a suspicion, directly report it to your line manager or any director or chief officer, or even any board member accessible, or just call 123.

5.7. Reporting Slavery

- 5.7.1. Talking to someone about your concerns may stop someone else from being exploited or abused.
- 5.7.2. If you think someone is in immediate danger, dial 123.
- 5.7.3. Otherwise, you should discuss your concerns with your country supply chain leader (found via Workday directory) who will decide on a course of action and provide any further advice or directly report it to your line manager or any director or chief officer, or even any board member accessible.
- 5.7.4. Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the supply chain leader before taking any further action.

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5.8. Training

- 5.8.1. We will be providing annually specialist training to those staff members who are involved in managing recruitment and our supply chains.
- 5.8.2. More general awareness training is provided to all staff via team leaders or managers and using online training modules.

5.9. Monitoring Our Procedures

- 5.9.1. We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

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6. Anti-Facilitation of Tax Evasion Policy

ANTI-FACILITATION OF TAX EVASION VALUE STATEMENT

Anglo Company Limited For Solutions and its offices across the globe (the "Company", "we", "our") take a zero-tolerance approach to all forms of tax evasion and the facilitation of tax evasion, whether under Egyptian law or under the law of any foreign country.

It is our policy to conduct all of our business dealings in an honest and ethical manner. This value statement governs all our business dealings and the conduct of all our employees and persons or organizations who are appointed to act on our behalf. At all times, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

We are 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 tax evasion facilitation.

WHO MUST COMPLY WITH THIS POLICY?

This policy applies to all persons working for the Company or any Group company and acting on our behalf in any capacity, including employees at all levels, directors, Associates (as defined below), and including but not limited to agency workers, seconded workers, volunteers, interns, contractors, external consultants, third-party representatives and business partners, sponsors or any other person associated with us, wherever located.

WHO IS RESPONSIBLE FOR THIS POLICY?

The Board of Directors of the Company has overall responsibility for ensuring that this policy complies with our legal obligations, and that our employees and Associates comply with it. This policy is adopted by the Company. It may be varied or withdrawn at any time, in the Company's absolute discretion. Employees in management or leadership positions are responsible for ensuring those reporting to them understand and comply with this policy.

WHAT IS THE FACILITATION OF TAX EVASION?

For the purposes of this policy:

Associates includes company contractors or an agent of the Company (other than a contractor) who is acting in the capacity of an agent, or any person who performs services for and on behalf of the Company who is acting in the capacity of a person or business performing such services.

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Tax Evasion means an offence of cheating the public revenue or fraudulently evading Egyptian tax and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

Foreign Tax Evasion means evading tax in a foreign country, provided that the conduct is an offence in that country and would be a criminal offence if committed in Egypt. As with tax evasion, the element of fraud means there must be deliberate action, or omission with dishonest intent.

Tax Evasion Facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax whether Egypt taxes or tax in a foreign country by another person, or aiding, abetting, counselling, or procuring the commission of that offence. Tax Evasion Facilitation is a criminal offence, where it is done deliberately and dishonestly.

Tax means all forms of Egypt taxation, including but not limited to corporation tax, income tax, value added tax, stamp duty, stamp duty land tax, national insurance contributions and includes duty and any other form of taxation (however described).

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

For the offence to be made out, the associated person must deliberately and dishonestly take action to facilitate the Tax Evasion by the taxpayer. If the associated person accidentally, ignorantly, or negligently facilitates the Tax Evasion, then the corporate offence will not have been committed. The Company does not have to have deliberately or dishonestly facilitated the Tax Evasion itself; the fact that the associated person has done so creates the liability for the Company.

Tax evasion is not the same as tax avoidance or tax planning. Tax evasion involves deliberate and dishonest conduct. Tax avoidance is not illegal and involves taking steps, within the law, to minimize tax payable (or maximize tax reliefs).

WHAT EMPLOYEES AND ASSOCIATES MUST NOT DO

It is not acceptable for employees and Associates (or someone acting on behalf of the employee or Associate) to:

- Engage in any form of facilitating Tax Evasion or Foreign Tax Evasion.
- Aid, abet, counsel, or procure the commission of a Tax Evasion offence or Foreign Tax Evasion offence by another person.
- Fail to promptly report any request or demand from any third party to facilitate the fraudulent Evasion of Tax by another person, in accordance with this policy.
- Engage in any other activity that might lead to a breach of this policy.

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- e. Threaten or retaliate against another individual who has refused to commit a tax evasion offence or a Foreign Tax Evasion offence or who has raised concerns under this policy.
- f. Commit an offence under the law of any part of Egypt consisting of being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax.

PREVENTION THROUGH VIGILANCE – EMPLOYEE AND ASSOCIATE RESPONSIBILITY

Employees and Associates must at all times adhere to this value statement and policy, and must ensure that they read, understand, and comply with this policy.

The prevention, detection and reporting of Tax Evasion and Foreign Tax Evasion are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

There is not an exhaustive list of Tax Evasion opportunities. At a more general level, the best defense against Tax Evasion and the facilitation of Tax Evasion remains the vigilance of our employees and Associates, and the adoption of a common-sense approach supported by our clear whistleblowing procedure. In applying common sense, employees must raise the following questions or report any of the following issues/concerns in the course of their day-to-day work:

- Is there anything unusual about the manner in which an Associate of the Company is conducting their relationship with the Company or a Third Party (usually a customer)?
- Is there anything unusual about a customer's or an Associate's conduct or behavior in your dealings with them?
- Are there unusual payment methods that have been requested or used? Unusual payment methods and unusual conduct of Third Parties with Company Associates can be indicative that a transaction may not be as it seems.
- You become aware, in the course of your work, that a Third Party has deliberately failed to register for VAT or failed to account for VAT.
- A Third-Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- You become aware, in the course of your work, that a Third Party working for us as an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions.
- A Third Party to whom we have provided goods requests that their invoice is addressed to a different entity, where we did not provide goods to such entity directly.
- A Third Party requests or requires the use of an agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to us.

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HOW TO RAISE A CONCERN

Employees are encouraged to raise concerns about any issue or suspicion of Tax Evasion or Foreign Tax Evasion as soon as possible.

If there is any suspicion of any intention that an employee, Associate or Third Party is attempting to, or is committing Tax Evasion or Foreign Tax Evasion, the details of the parties and the transaction must be reported to the Company's finance department, as soon as possible, who will report the circumstances to whom it concerns precisely.

If you are unsure about whether a particular act constitutes Tax Evasion or Foreign Tax Evasion, raise it with the contacts detailed below as soon as possible. You should note that the corporate offence is only committed where you deliberately and dishonestly take action to facilitate the Tax Evasion or Foreign Tax Evasion. If you do not take any such action, then the offence will not be made out. However, a deliberate failure to report suspected Tax Evasion or Foreign Tax Evasion, or "turning a blind eye" to suspicious activity could amount to criminal facilitation of tax evasion.

Any queries or suspicions should be directed to the following personnel: Mohamed Rahmy – Business Development Director

WHAT HAPPENS IF THE EMPLOYEE PREFERS, FOR COMMERCIAL REASONS, NOT TO REPORT THEIR SUSPICIONS?

This should never happen. If we, as an employer, fail to prevent our employees, workers, agents, or service providers from facilitating Tax Evasion, and if there is any suspicion of any intention to evade tax and the transaction is nevertheless finalized, the Company can be criminally prosecuted, subject to a large fine and be publicly named and shamed causing damage to our reputation. We therefore take our legal responsibilities seriously.

Individuals 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.

TRAINING AND COMMUNICATION

Training on this policy will be provided as necessary. Such training may form part of wider financial crime detection and prevention training.

Our zero-tolerance approach to Tax Evasion or Foreign Tax Evasion must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate after that.

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BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals, Associates and organizations working on our behalf if they breach this policy.

Please feel free to reach out to us for any further information, concerns or assistance.

Thank you for your kind understanding and cooperation.

Best Regards,

Mohamed Rahmy

Managing Director

Signature:

Date:

22-11-2024