


Form	Issue #: (4)	Rev. #: (0)	Rev. Date:01/09/2022	AS-PO-01
		Anti-Slavery Policy		INCOM Egypt
Issue		Top Management		Revision
4	01/09/2022	AS-PO-01		0 01/09/2022

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. The company recognizes various forms which are: slavery, servitude, forced or compulsory labor and human trafficking; all of which deprive a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in our business dealings and relationships and expressly intend to prevent modern slavery in our own business as well as helping prevent modern slavery in our supply chains.
- 1.2 We are also committed to transparency in our own business and in our approach to tackling modern slavery. Under the Modern Slavery Act 2015, we are legally required to disclose the steps we take to tackle modern slavery. We expect the same high standards from all of our employees and suppliers.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, suppliers, seconded workers, volunteers and interns.
- 1.4 This policy does not form part of any INCOM employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THIS POLICY

- 2.1 The board of directors has overall responsibility to ensure this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Legal and Human Resources departments have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal procedures.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Guidance on the policy can be obtained from the Legal and Human Resources teams.

3. COMPLIANCE WITH THIS POLICY

- 3.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is 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.

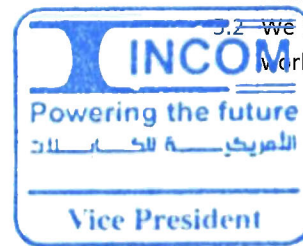
- 3.2 You must notify your manager (or your main point of contact at INCOM if you are a supplier) as soon as possible if you believe or suspect that a breach of this policy has occurred, or many occur in the future.
- 3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains or any supplier tier.
- 3.4 If you believe or suspect a breach of this policy has occurred or may occur, you must notify your manager (or your main point of contact at INCOM if you are a supplier).
- 3.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitute any of the various forms of modern slavery, you should raise it with your manager (or your main point of contact at INCOM if you are a supplier).
- 3.6 We aim to encourage openness and we 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 by INCOM as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Human Resources Officer immediately. If the matter is not remedied and you are an employee, you should raise it formally using our grievances procedure.

4. COMMUNICATION AND AWARENESS OF THIS POLICY

- 4.1 Guidance on this policy forms part of the induction process for all individuals who work for us and will be provided otherwise as necessary.

5. BREACHES OF THIS POLICY

- 5.1 Any employee who breaches this policy will face disciplinary actions, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organizations working for us or on our behalf (including suppliers) if they breach this policy.



Vice President
Bashadjenji