

Cascade Technologies L.L.C.

Code of Business Ethics

1. Purpose and Scope

This Code of Business Ethics (the “Code”) sets the ethical standards for all Lnkr Tech directors, officers, employees, advisors, contractors, and third-party representatives. It applies globally and reflects our commitment to integrity, patient-centric innovation, and compliance in the highly regulated healthtech sector.

The Code is grounded in Egyptian law (Penal Code Articles 103–111 for anti-bribery, Personal Data Protection Law No. 151/2020 as amended with 2025 Executive Regulations, Anti-Graft Law No. 62/1975, and Companies Law) and international best practices (e.g., MedTech Europe Code of Ethical Business Practice).

2. Core Principles

Integrity and Honesty: Act honestly, fairly, and in the best interests of the Company, patients, and stakeholders.

Compliance with Law: Zero tolerance for violations of Egyptian or host-country laws.

Patient and Data Centricity: Protect health data as a sacred trust.

Respect and Inclusion: Foster a diverse, inclusive, and respectful workplace.

Accountability: Report concerns without fear of retaliation.

3. Key Policies

1 Data Privacy and Security (Health Data Ethics)

- Health data is “sensitive personal data” under PDPL No. 151/2020.
- We maintain a Data Protection Officer (DPO) and hold required PDPC licences/permits.
- Explicit consent, purpose limitation, data minimization, and retention limits apply.
- Implement technical and organizational measures (encryption, access controls, breach notification within 72 hours).
- International transfers only with adequate safeguards (Standard Contractual Clauses or equivalent).

- No secondary use of patient data without consent or legal basis.

2 Conflicts of Interest

- Disclose any actual or potential conflict (personal investments, board seats, family relationships) immediately to the Board/Compliance Officer.
- Recuse from decision-making where conflicted.
- Annual conflict-of-interest declarations required from all directors and senior employees.

3 Anti-Bribery and Anti-Corruption

- Zero tolerance for bribery, facilitation payments, or corrupt practices (Penal Code and Anti-Graft Law).
- Prohibited: offering/giving/receiving anything of value to influence decisions (public or private sector).
- Gifts and hospitality must be modest, transparent, and documented (limit EGP 500 per instance; annual cap EGP 5,000 per recipient).
- Third-party due diligence required before engagements.
- Mandatory anti-bribery training annually.

4 Anti-Money Laundering and Sanctions

- Comply with Anti-Money Laundering Law No. 80/2002 (as amended).
- Perform KYC/AML checks on partners and investors.

5 Fair Competition and Antitrust

- No collusion, price-fixing, or improper information exchange with competitors.
- Comply with Egyptian Competition Law.

6 Insider Trading and Market Abuse

- No trading on material non-public information.
- Blackout periods and pre-clearance procedures apply.

7 Confidentiality and Intellectual Property

- Protect Company and third-party confidential information, including patient data.
- All IP developed by employees belongs to the Company.

8 Workplace Conduct and Human Rights

- Zero tolerance for harassment, discrimination, or retaliation.
- Promote equal opportunity and work-life balance.

- Support modern slavery/human trafficking prohibitions.

9 Sustainability and Social Impact

- Advance digital health equity in MENA.
- Minimize environmental footprint where feasible.

10 Gifts, Entertainment, and Political Activities

- All must be modest, infrequent, and documented.
- No corporate political contributions without Board approval.

4. Reporting and Enforcement

Speak-Up Channel: Anonymous reporting via [designated hotline/email/internal platform] to Compliance Officer or Board Chair.

All reports investigated promptly and fairly.

Non-retaliation policy strictly enforced.

Violations may result in disciplinary action up to termination and legal referral.

Certification: All employees and directors must acknowledge receipt and understanding of this Code annually.

5. Review and Updates

This Code will be reviewed annually by the Board or Audit & Risk Committee and updated as laws or business needs evolve.