

GLOBAL ANTI-CORRUPTION POLICY

Owner: [Owner Name], Chief Compliance Officer

Reviewer: [Reviewer Name], General Counsel

Approver: Board of Directors

Date: November 12th, 2021

Version: 5.0

Language: English

Scope: Global



Global Anti-Corruption Policy

Last update: November 12th, 2021

1. Policy Statement

SIMAT is:

1. Committed to do business legally, ethically and professionally worldwide
2. Committed to ensuring that SIMAT Professionals, joint venture partners and Third Parties, understand this Policy and carry on business on behalf of SIMAT in a legal, ethical and professional manner.
3. Committed to fighting against bribery (including commercial bribery), kickbacks, improper or illegal payments, gifts or contributions, and any other improper method of seeking favourable treatment from Public Officials, customers, directors, officers or employees of other companies or any other person.
4. Committed to complying with the anticorruption laws relevant in the countries where it carries on business.
5. Committed to taking breaches of this Policy seriously
6. Committed to maintaining an effective implementation in furtherance of this policy.

All SIMAT Professionals, joint venture partners acting on SIMAT's behalf and Third Parties are required to comply with this Policy and are prohibited from offering, promising, making, soliciting or accepting - directly or indirectly, any unjustified benefit or advantage (bribes, kickbacks or other illicit payments) in any way related to SIMAT's business, which entails a breach of the recipient's obligations. The Chief Compliance Officer will designate the SIMAT Professionals that will attend training on this Policy.

SIMAT will not tolerate violations of this Policy. Violations of this Policy must be reported to the Chief Compliance Officer or Division Compliance Officer of SIMAT.

SIMAT practices a no retaliation policy: SIMAT Professionals will not be subjected to retaliation for good faith reports of suspected breaches or violations of this Policy or for cooperating under this Policy.





Global Anti-Corruption Policy

Last update: November 12th, 2021

The Chief Compliance Officer is the owner of this Policy and has ultimate responsibility for implementation and compliance with this Policy. The Chief Compliance Officer will be responsible to drive awareness of this Policy within SIMAT. Please contact the Chief Compliance Officer or the Division Compliance Officer of SIMAT if you have any questions about this Policy.

