



## COMPANY POLICY

Revisions: formerly without document number assignment, approved by ACM 2020

DOCUMENT NUMBER: CP-3

REVISION:

CREATED BY:

CREATION DATE:

APPROVED BY:

(RE-)APPROVAL DATE:

E.J. MAKRIDES

8-1-20

E.J. MAKRIDES

5-10-23

TITLE: ANTI-BRIBERY POLICY STATEMENT

### ANTI-BRIBERY POLICY STATEMENT

#### Policy Statement

The Company conducts business in an honest and ethical manner and has a zero-tolerance approach to bribery and corruption. It expects all employees to act professionally, fairly and with integrity in all business dealings and relationships. The Company will conform to all relevant bribery and corruption rules and regulations in all jurisdictions in which it conducts business, and the Company expects its suppliers to do the same.

#### Scope

All employees must comply with this policy in all their business dealings. Any breach may lead to significant disciplinary penalties up to and including dismissal. Suppliers must also comply with this policy, and failure to do so may result in removal from the Company's Approved Supplier List.

#### Charitable Donations and Sponsorships

The Company may make charitable donations and sponsor or contribute to various philanthropic activities as opportunities arise. All such donations and sponsorships must be approved by management, be in accordance with company policies in place at the time and supervised and recorded by its finance office.

#### Responsibility

This policy applies to all employees of the Company. Employees are required to report any breaches of this policy, included suspected breaches by suppliers, to their supervisor promptly.



# COMPANY POLICY

Revisions: formerly without document number assignment, approved by ACM 2020

DOCUMENT NUMBER: CP-3

REVISION:

CREATED BY:

CREATION DATE:

APPROVED BY:

(RE-)APPROVAL DATE:

E.J. MAKRIDES

8-1-20

E.J. MAKRIDES

5-10-23

TITLE: ANTI-BRIBERY POLICY STATEMENT

## Annual Review / Revision History

Date	Approver Signature	Description/Notes	Revision (if changes made)
5-10-23	<i>Elizabeth Hels</i>	Assigned document number/transitioned to HSE management system control	CP-3
5-7-24	<i>Elizabeth Hels</i>	NO CHANGE	