

	Corporate Anti-Bribery Policy	Doc. No.	POL-02
		Issue No./Date	01/01.01.2018
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STATEMENT OF POLICY

As a company with sales and manufacturing operations, SPACO(“SPACO” or the “Company”) interacts regularly with government officials. This policy bars employees from providing or offering anything of value to any government official to improperly influence that official.

It is the Company’s policy to prohibit bribery in any form. As set out in the Standards of Business Conduct, no SPACO employee or representative may pay bribes or make other improper payments to any third party, including a government official. These obligations apply to SPACO’s officers, directors, and employees, as well as any person who works for a SPACO’s company of any nationality and in any location. Compliance with this policy is mandatory. Failure to comply with these laws may create substantial exposure for the Company and its employees, including criminal prosecution, heavy fines, imprisonment of individuals, civil penalties, debarment, and serious damage to the Company’s reputation.

The law also requires companies and their subsidiaries to keep accurate books and records, and to maintain an adequate system of internal controls. Failure to comply with these provisions can also subject SPACO and its employees to significant penalties, and can subject SPACO employees to discipline.

This Policy Statement elaborates on the compliance obligations of the Company and its personnel. In particular, the Company, its personnel, and third parties working on the Company’s behalf, shall comply with all applicable anti-corruption laws. Those laws generally prohibit giving a financial or other advantage, or anything else of value, to a government official in order to:

- ☐ influence any act or decision of the official in his or her official capacity;
- ☐ induce the official to do or omit to do any act in violation of his or her lawful duty;
- ☐ induce the official to use his or her influence to affect a government decision; or
- ☐ secure any other improper advantage.

“Government official” is defined broadly. It includes officials and employees of any national, regional or local government or agency; officials and employees of government-owned or -controlled companies; officials of political parties and candidates for public office; officials and employees of public international organizations and anyone acting on behalf of any of the foregoing organizations.

SPACO policy also prohibits the Company, its subsidiaries and employees from using another company or individual, such as a consultant or distributor, to engage in any of the foregoing activities.

SPACO must ensure that its books and records are accurate, and that an adequate system of controls are in place to help prevent and detect corrupt payments and other financial irregularities.

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SPACO is also subject to anti-corruption laws that prohibit commercial bribery – that is, bribery of customers, competitors, suppliers, and other actors in the marketplace. SPACO policy prohibits commercial bribery, and SPACO people must strictly comply with those laws. No business shall be transacted by SPACO that does not comply with these requirements.

COMPLIANCE

Business Units of the Company are responsible, with the support of the regional managers, for the application and implementation of this Policy within their respective operations. Each Business Unit of the Company shall also implement the Anti-Corruption Compliance.

HR & Admin Department shall support this policy by providing training and counseling to the Business Units. Completion of training programs shall be mandatory for those personnel to whom the training is deployed.

A failure by any employee of the Company or any individual acting on the Company's behalf to comply with this Policy should be reported immediately to the Legal & Human Resource department and promptly corrected. Violations of this Policy, or other anti-corruption laws, or failure to report violations of this Policy, may result in disciplinary action including dismissal, demotion, or reprimand. Additionally, individuals may face criminal or civil liability as a result of violating the other anti-corruption laws.

If you have any questions concerning this Policy or the application of applicable anti-corruption laws, please raise them with your supervisor or contact the SPACO Ethics committee. If you are aware of any violation of this policy, you must report the matter in accordance with SPACO's policy on Internal Investigations. No adverse action will be taken against a SPACO person for raising a concern about compliance with this policy if that concern is raised in good faith.

DH HR	MD	DH HR
Prepared by	Approved by	Issued by