

## ANTI-BRIBERY POLICY STATEMENT

SICE Pty Ltd and SICE NZ Ltd (SICE) is committed to demonstrating their due diligence in all business activities with this Anti-Bribery Policy, whilst promoting an ethical professional culture, trust and confidence in business dealings and enhancing its reputation. It helps SICE avoid or mitigate costs, risks and damages of involvement in bribery. This SICE Anti-Bribery Policy is a component of the overall Compliance policy of SICE TyS and is fully aligned to the latter.

SICE Anti-Bribery Policy demands from all members throughout the organisation compliance and respect for the current legislation in the broadest terms, including but not limited to the anti-bribery legislation applicable in Australia/New Zealand. It indicatively prohibits the solicitation and acceptance of bribes by the organisation's personnel and anyone working on behalf of the organisation.

For the effective operation of its anti-bribery management system, SICE guarantees sufficient technical, organisational and human resources, as well as the implementation of monitoring and control measures, within a framework of commitment to continual improvement. Any measures adopted by the organisation shall be appropriate, reasonable and proportionate to the bribery risks faced.

### Policy principles

This Anti-Bribery Policy, maintained, promoted and approved by SICE's Senior Management, is part of SICE's anti-bribery management system and is reinforced by the following principles:

- Identification of the activities where a bribery act could be committed, expressly prohibiting the perpetration thereof and putting in place the necessary means of prevention.
- Minimisation of the organisation's exposure to bribery risks by establishing proper risk management protocols and control mechanisms.
- Institution of a Corporate Compliance Body endowed with autonomous powers of initiative and control, with independence in the exercise of its functions.
- Development and dissemination of ethical business culture at all levels of the organisation.
- Commitment towards SICE personnel not suffering retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspicion of violation of the organisation's anti-bribery policy, or for refusing to engage in bribery.
- Establishment of adequate internal and external communication channels, guaranteeing both confidentiality and the absence of reprisals for whistle-blowers.
- Applying the corresponding penalisation measures in the event of a breach or violation of any of the obligations and requirements established in the anti-bribery policy or anti-bribery management system.
- Communication, participation and consultation with stakeholders, staff, and contractors.

  
Manuel González Arrojo, SICE ANZ Managing Director

## Document Control

<b>Business Unit</b>	Corporate Compliance
<b>Security Classification - Confidentiality</b>	<b>Proprietary</b> All SICE ANZ Staff and Contractors are authorised to access this document. This document can be shared with authorised external organisations.
<b>Document Owner</b>	Corporate Compliance Delegate / Managing Director

## Responsibilities

	Prepared	Reviewed	Approved
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<b>Role</b>	Marketing Officer	Corporate Compliance Delegate	Managing Director
<b>Date</b>	23/08/2022	23/08/2022	23/08/2022

## Revision History

Rev No.	Date	Issue / Description	Approved
00	13/12/2019	First version.	Manuel Gonzalez Arrojo
01	17/02/2020	General revision. The scope of the document in the title changed from SICE PTY LTD to SICE ANZ. SICE PTY LTD replaced with SICE PTY LTD and SICE NZ Ltd.	Manuel Gonzalez Arrojo
02	05/03/2021	General revision, new corporate identity.	Manuel Gonzalez Arrojo
03	20/08/2021	“Statement” category added to policy title. Confidentiality classification table included in Document Control section.	Manuel González Arrojo
06	23/08/2022	New principle added to include the term “participation”	Manuel González Arrojo