



POLICY

# ANTI-CORRUPTION



Beyond inspection

## REVISION LOG / HISTORY

Revision	Prepared by	Date	Change Description
1.0	Ddary Gao	2023/09/08	New release



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## INTRODUCTION

Senegy Technical Services Limited and its affiliated entities (Hereinafter referred to as STS) is committed to conducting its business ethically and in compliance with all applicable laws and regulations. This document describes STS policy prohibiting bribery and other improper payments in the conduct of STS operations to obtain a business advantage, as well as responsibilities and requirements for ensuring the proper implementation of this policy.



## 1 PURPOSE

This policy aims to establish strict rules of anti-corruption for employees, contractors and other stakeholders of STS on how to conduct their duties ethically and with integrity.

## 2 APPLICABILITY

This policy is applicable for all employees, contractors and other stakeholders of STS.





### 3 REFERENCES

00-POL-0001-EN	Whistleblower Protection Policy
00-POL-1010-EN	Employee Code of Conduct
00-POL-0020-EN	Compliance with Laws Policy
00-POL-0080-EN	Gifts & Hospitality Policy



## 4 TERMS AND DEFINITIONS

### CORRUPTION

Corruption is defined as the abuse of entrusted power for private gain.

### BRIBERY

Bribery is offering or giving anything of value to any person for the purpose of obtaining or retaining business, or securing an improper advantage.

### KICKBACK

A kickback is a type of bribery in which someone receives money or something of value in exchange for providing something to a third party.





## 5 RESPONSIBILITIES

### STS EMPLOYEES

It is the responsibility of all STS employees to comply with the requirements of this policy and report any suspected or actual violations of this policy, including any corruption or illegal behavior.

### STS

It is the responsibility of STS to comply with laws in the country where it does business. STS shall offer training or explanations to all employees to make sure they understand the importance of anti-corruption.

### CONTRACTORS AND OTHER STS STAKEHOLDERS

It is the responsibility of STS's contractors and other stakeholders to comply with the requirements of the Anti-corruption Policy and support the company to implement robust anti-corruption measures and practices to protect the reputation and interests of STS.





## 6 PRINCIPLES

STS is committed to conducting its business with integrity and in compliance with all applicable laws and regulations. The company will not tolerate any form of corruption, including bribery, kickbacks, or other illegal or unethical behavior.



## 7 STATEMENTS / REQUIREMENTS

### 7.1 ANTI-CORRUPTION REQUIREMENTS

Business relationships must be based on objective criteria. STS employees may not offer or accept benefits or gifts of any value while carrying out their professional duties.

No direct or indirect payment or use of STS assets shall be made to or for the benefit of any governmental representative or employee, manufacturer, or current or prospective customer or supplier for the purpose of improperly obtaining benefit of any kind, nor shall any STS employee accept any improper payment or benefit from any source.

### 7.2 COMPLIANCE PROGRAM

To ensure that all STS employees, contractors and other stakeholders understand and adhere to the principles of anti-corruption, the following requirements must be met:

#### 7.2.1 Prohibited conducts

All employees, contractors and other stakeholders must not:

- a) Offer, promise or give any form of bribery or kickback to any person or entity in exchange for any improper advantage or benefit.
- b) Solicit, accept or receive any form of bribery or kickback from any person or entity in exchange for any improper advantage or benefit.
- c) Engage in any other form of corruption or illegal behavior, including fraud, embezzlement, money laundering or other financial crimes.

#### 7.2.2 Gifts and hospitality

Employees, contractors and other stakeholders of STS must not accept or offer any gift, entertainment or hospitality that could influence or appear to influence their business decisions.

The detail refers to the Gifts and Hospitality Policy (00-POL-0080-EN).

#### 7.2.3 Due diligence and third-party relationships

Before entering any business relationship, employees, contractors and other stakeholders must conduct appropriate due diligence on the other party to ensure that they do not have a history of corruption or other illegal or unethical behavior.

The company will also implement contracts or agreements that establish clear expectations and requirements for ethical conduct.

#### 7.2.4 Training and communication

STS will provide regular training and communication to all employees, contractors and other stakeholders on anti-corruption policy, laws and regulations. This will help ensure that everyone understands their obligations and responsibilities to prevent and report corrupt behavior.

#### 7.2.5 Reporting

All employees, contractors and other stakeholders are encouraged to report any suspected or actual violations of this policy, including any corruption, bribery, kickback or other illegal behavior.

Reports can be made anonymously, and whistleblowers will be protected from retaliation. The company will investigate all reports of violations and take appropriate disciplinary action against any individuals found to have violated this policy.

The detail refers to the Whistleblower Protection Policy (00-POL-0001-EN).

### 7.3 REVIEW AND REVISION

To ensure that the policy remains relevant and effective, STS shall conduct periodic reviews and control the revision process. Reviews shall consider changes to STS' operating environment, legal and regulatory requirements.

### 7.4 CONSULTATION

The company expects all employees, contractors and other stakeholders to comply with this policy to ensure the interests of the company are not compromised. By adhering to this policy, STS can also preserve its image and reputation.

When in doubt as to how to resolve a contradiction between this policy and applicable laws, employees should seek guidance from the Legal, Compliance and Governance Department.