

ANTI-BRIBERY POLICY STATEMENT

SICE Pty Ltd and SICE NZ Ltd (SICE) is committed to maintaining the highest standards of diligence and integrity across every aspect of our business operations, as reflected in this Anti-Bribery Policy. Our aim is to foster an ethical professional culture, instilling trust, and confidence in our business dealings, thereby enhancing our reputation.

This policy is designed to prevent or mitigate the costs, risks, and damages associated with involvement in bribery. It requires all our team members and business partners to comply with and respect the current legislation in the broadest terms, including but not limited to the anti-bribery laws applicable in Australia/New Zealand. We unequivocally prohibit any form of solicitation or acceptance of bribes by SICE personnel and individuals acting on our behalf.

Integral to SICE's comprehensive Compliance framework, this policy adheres to the SICE TyS Criminal, Anti-Bribery Compliance, and Behaviours Against the Defence of the Competition Policy. It outlines the framework for setting, reviewing, and achieving our anti-bribery objectives, which are guided by the following principles:

Policy principles

- Identification of activities susceptible to bribery, prohibiting such acts, and implementing preventive measures to minimise SICE's exposure to bribery risks through robust risk management policies and control mechanisms. All measures adopted will be appropriate, reasonable, and proportionate to the bribery risks faced.
- Ensuring the effectiveness of our anti-bribery efforts and our overall compliance management system by providing adequate technical, organisational, and human resources.
- Establishment of a Corporate Compliance Body vested with autonomous powers of initiative and control, ensuring independence in its functions.
- Promotion and dissemination of an ethical business culture across all organisational levels.
- Facilitation of communication, participation, and consultation of staff and relevant stakeholders.
- Establishment of adequate internal and external communication channels, guaranteeing both confidentiality and the absence of reprisals for whistleblowers.
- Commitment to safeguarding SICE personnel from retaliation, discrimination or disciplinary action for reports made in good faith or based on a reasonable belief of violation or suspicion of violation of the organisation's anti-bribery policy, or for refusing to engage in bribery.
- Adoption of appropriate penalisation measures in the event of breaches or violations of the Anti-bribery policy or the compliance management system.
- Implementation of robust monitoring, control, and other performance review measures within a framework of continuous improvement.

Manuel González Arrojo, SICE ANZ Managing Director



Document Control

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

Responsibilities

	Prepared	Reviewed	Approved
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Role	Corporate Compliance and CSR Manager	HSEQ Manager	Managing Director
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Revision History

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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
04	23/08/2022	New principle added to include the term “participation”.	Manuel González Arrojo
05	23/04/2024	General review, fixed typo in Revision History sequence.	Manuel González Arrojo