

SPCC ANTI-CORRUPTION POLICY
(Public Extract)

At SPCC, zero tolerance for corruption is established. Corrupt behaviors such as bribery, extortion or instigation of crime, influence peddling, and unauthorized facilitation payments are prohibited for all workers, whether conducted directly or through third parties or intermediaries.

The guiding principles of SPCC are closely related to emphatically and categorically rejecting any act of corruption, as well as any form of improper or dishonest behavior, in both public and private spheres.

WE ARE COMMITTED TO:

1. Establishing prohibitions for all SPCC staff from engaging in any corrupt behavior directly or indirectly, as well as doing business with those who do not share values or harm the reputation of SPCC, among other.
2. Setting obligations for all SPCC staff to carry out activities fairly, honestly, and openly, in compliance with the provisions of the SCC Code of Ethics and Business Conduct.
3. Implement financial controls to ensure that accounting is carried out in a way that reveals any discrepancies and allows for corrective measures, as well as non-financial controls to prevent, detect, or manage corruption risks early on.
4. Designing guidelines regarding gifts, entertainment, and hospitalities, as well as donations, sponsorships, social and community investments, to establish the guidelines and obligations that all SPCC workers must follow to comply with internal and external regulations.

All SPCC workers, third parties acting on its behalf, representation and/or benefit (directly or indirectly), and third parties with whom SPCC interacts, are subject to this policy.