

The SEPCO General Business Principles state our insistence on honesty, integrity and fairness in all aspects of our business. The direct or indirect offer, payment, solicitation or acceptance of bribes is unacceptable.

In line with this principle, SEPCO maintains a global Anti-Bribery and Corruption (ABC) programme that includes elements designed to prevent or detect and remediate potential violations. The programme begins with our anti-bribery commitment, an integral part of the SEPCO General Business Principles.

Our policy is clear: we do not tolerate the direct or indirect offer, payment, solicitation or acceptance of bribes in any form. Facilitation payments are also prohibited. Our Code of Conduct includes specific instructions to staff, such as requirements to avoid or declare potential conflicts of interest and others that concern the offer or acceptance of gifts and hospitality.

Communications from leaders include messages about these commitments and the associated requirements. These are reinforced with both global and targeted communications to ensure that staff are frequently reminded of their obligations.

In addition to the Code of Conduct, we have established mandatory anti-bribery procedures and controls applicable to all SEPCO Businesses and Functions throughout their operations. The procedures and controls are designed to address a range of corruption-related risks and to focus resources and attention in the areas of higher risk.

We regularly review and revise these procedures, controls and risk criteria to ensure they remain up-to-date with applicable laws, regulations and best practices. Our programme reviews also take into account results from relevant internal audits, reviews and investigations.

As part of our approach to ethics & compliance training, we take action to ensure that our anti-corruption policies, standards, and procedures are communicated to all directors, officers, employees, and, where necessary and appropriate, to agents and business partners. Particular areas of focus with third parties include continued strengthening of due

diligence procedures and clearly articulated requirements (for example, through the use of standard contract clauses).

Requests for advice or reporting of concerns may be submitted via the SEEPCO Global Helpline or through internal channels, as with other requests or concerns related to the Code of Conduct or Business Principles. All allegations concerning bribery or corruption are investigated.

See Business Integrity – SEEPCO Global for further information on reporting of violations and Code of Conduct investigations.

When we discover that bribery or fraud allegations are imposed against any third party performing work for SEEPCO, we review our relationship with that party and take appropriate action.

The SEEPCO Ethics & Compliance Office, including the Chief Ethics & Compliance Officer as well as programme and operational business support teams, assists the Businesses and Functions in programme implementation; also, they monitor and report on progress. Dedicated legal counsel provides legal advice and likewise assists in monitoring programme implementation.