



Anti-bribery and Corruption Policy

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Approved by: Board of Directors

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MKS PAMP

1. Objectives

MKS PAMP SA is committed to conduct all its business activities in a lawful, fair, open, competitive, transparent and ethical manner.

MKS PAMP SA take a zero-tolerance approach to bribery and corruption and is fully committed to acting honestly, impartially and with the highest level of integrity and ethical standards in all our business markets, dealings, relationships and transactions. This policy forms an integral part of such commitment.

This policy applies for and is binding on all individuals working at all levels and all grades within MKS PAMP SA, including directors, officers, managers, employees (whether permanent, fixed-term or temporary), casual workers, trainees, interns, agents and representatives and any and all other person in the course of their professional engagement in the name of and for and on behalf of MKS PAMP SA, wherever geographically located (hereinafter referred to as "**Covered Persons**").

In line herewith, each Covered Person is hereby strictly prohibited from, directly or indirectly:

- promising, offering, paying or authorizing, requesting, agreeing to receive, receiving or authorizing receipt of any bribe, facilitations payment, kickback or other illicit payment to or from any Third Party;
- promising, offering, paying or authorizing, requesting, agreeing to receive, receiving or authorizing receipt of any bribe, facilitations payment, kickback or other illicit payment to or from any Government Official;
- promising, offering, paying or authorizing, requesting, agreeing to receive, receiving or authorizing receipt of any gift or entertainment or other such similar hospitality or promotional expenditure to or from a Third party or to a Government Official, other than as regulated in our separate Gift and Entertainment Policy.

MKS PAMP SA do not make contributions to any political party or candidate.

Any queries, comments or suggestions on this policy should be addressed to compliance@mkspamp.com.

2. Responsibilities

This policy is an additional and complementary guidance to our Code of Conduct and our Gift and Entertainment Policy, providing the internal regulatory framework for all Covered Persons on how to recognize and deal with various bribery and corruption issues. Each Covered Person has a personal responsibility and obligation to apply this policy in all their business activities. Failure to do so may result in disciplinary action, up to and including dismissal.

Bribery and corruption are criminal offenses in Switzerland and may give rise to imprisonment, criminal fines, penalties and forfeitures of objects and assets, company criminal liability, business prohibitions and exclusion from participating in tendering for public contracts.



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3. Definitions

- Bribery and bribe means the direct or indirect offering or provisioning of money or anything of monetary or financial value or any undue advantage, contribution, reward or relationship/position in return for a business advantage or a favorable administrative, commercial, contractual or regulatory treatment, outcome or gain.
- Corruption means the soliciting of and/or acceptance of a bribe for private gain, by means of misuse of a public position or governmentally entrusted position of power.
- Facilitation payment (also known as a "*grease payment*") means a smaller, unofficial payment or gift made to secure, facilitate or speed up the performance of a routine or necessary action, most commonly performed by a Government official, to which the payer of the facilitation payment has legal or other entitlement, such as e.g. the clearing of goods through customs or import/exporting services or the issuance of visas, permits or licenses.
- Government official means (i) an officer, employee or person acting on behalf of a government, a state-owned or state-controlled legal entity or a legal entity which is mandated by a government or state-owned or state-controlled legal entity to administrate public functions and any department, agency or instrumentality of such government, state-owned, state-controlled or mandated legal entity; (ii) members of armed forces; (iii) members of political parties; (iv) candidates for political office; and (v) officers, employees and persons acting on behalf of public international organizations, such as e.g. the United Nations, the Monetary Fund and the Organization for Economic Cooperation and Development.
- Kickback means an agreed Third Party compensation payment, typically paid for the securing of a favourable outcome or biased recommendation or preferential treatment of the payer in its competing for a concession, business award, bid, tender or procurement contract or other such similar selective, decision-making business process, where a percentage of the value of the business so obtained by the payer is "kicked back" to the Third Party, most commonly in the form of a fee or a commission.
- Third Party means any legal entity or individual for which this policy does not directly apply.

4. Internal reporting duties

Each Covered Person is required to promptly report to their immediate supervisor /manager having been offered a bribe or being asked to make a bribe by any Third Party or Government Official and/or any activity, concern, query or suspicion of bribery, corruption, illicit payments or other malpractice that might lead to or indicate a breach of this policy.

If the reporting concerns someone within MKS PAMP SA, our confidential grievance mechanism; responsiblepm@mkspamp.com, may alternatively be used for such purpose.



5. Approval and review

This policy may be periodically reviewed and amended.

Approved by the Board of Directors of MKS PAMP SA on 8 May 2023.

Karma Liess-Shakarchi
Chairman

Marwan Shakarchi
Member