



ANTI-CORRUPTION POLICY

PURPOSE

This Anti-Corruption Policy aims to establish a comprehensive framework that guides the conduct of all individuals associated with SNF in preventing corruption. This policy intends to ensure that SNF operates with integrity, transparency, and accountability in all business activities. Anti-corruption policies may vary from one jurisdiction to another depending on the applicable rules. Any person concerned is encouraged to refer to the Anti-Corruption Policy of the relevant jurisdiction for further details.

SCOPE

This policy applies to all individuals associated with SNF, including but not limited to employees, contractors, consultants, suppliers, partners, and agents.

POLICY STATEMENT

Compliance with Laws and Regulations

All individuals must comply with all applicable laws and regulations related to anti-corruption, bribery, and unethical practices, both in the jurisdiction where SNF operates and internationally.

Employees must familiarize themselves with the relevant laws and regulations and seek guidance from the designated Compliance Officer if required.

Prohibition of Bribery


No employee or representative of SNF shall offer, promise, authorize, or accept bribes, kickbacks, or any other form of improper payments, whether directly or indirectly, to or from any person or entity.

All business transactions must be conducted transparently, with integrity, and solely based on legitimate considerations.

Gifts and Hospitality

Employees must exercise caution when giving or receiving gifts, hospitality, or entertainment to or from any person or entity related to SNF.





Gifts and hospitality should be of reasonable value, appropriate, and compliant with local customs and laws.

Employees must report to the designated Compliance Officer any gifts or hospitality received that exceed SNF's pre-approved thresholds.

Conflicts of Interest

Employees must avoid situations where personal interests conflict or may appear to conflict with the interests of SNF.

Employees must disclose any actual or potential conflicts of interest to their supervisor or the designated compliance officer.

Due Diligence

SNF will conduct due diligence on third parties, such as suppliers, partners, and agents, to ensure they have a track record of ethical conduct and are not involved in corrupt practices.

Written agreements with anti-corruption provisions must govern all business relationships with third parties.

Reporting and Whistleblowing

Employees must promptly report any suspected or actual corruption or unethical behavior to their supervisor, the designated compliance officer, or through SNF's confidential whistleblowing mechanism. Employees shall refer to the applicable whistleblowing policy to comply with the reporting procedure.

SNF will protect whistleblowers from retaliation and ensure that all reports are treated with confidentiality.

Training and Awareness

SNF will provide regular training and awareness programs to ensure everyone understands their obligations under this Anti-Corruption Policy.

Training programs will cover identifying and preventing corruption, recognizing red flags, and reporting procedures.

Enforcement and Consequences

Violations of this Anti-Corruption Policy may result in disciplinary action, including but not limited to termination of employment, contract termination, legal action, and reporting to appropriate authorities.

REVIEW AND UPDATES

This Anti-Corruption Policy will be reviewed periodically to ensure its effectiveness and compliance with changing laws and regulations. Updates to the policy will be communicated to all individuals associated with SNF.

By adhering to this Anti-Corruption Policy, we commit to maintaining the highest standards of ethics, integrity, and transparency in all business activities.

