

SAMA

ANTI-CORRUPTION POLICY

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PURPOSE

This Anti-Corruption Policy sets forth SAMA's commitment to conducting business with integrity and in compliance with all applicable anti-corruption laws and regulations, including but not limited to the (U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, Laws and regulations in EU and all countries where SAMA has presence].

We have zero tolerance for bribery and corruption in any form.

SCOPE

This policy applies to all employees, officers, directors, consultants, contractors, agents, representatives, and any other individuals or entities acting on behalf of SAMA (collectively referred to as "Representatives").

DEFINITION OF CORRUPTION

Corruption is the abuse of entrusted power for private gain.

This policy prohibits all forms of corruption, including but not limited to:

- **BRIBERY:**

Offering, promising, authorizing, or giving anything of value to a government official, political party official, candidate for public office, or employee of a state-owned enterprise (collectively, "Government Official") or to any other person, to influence an act or decision of that person or to induce that person to use their influence to affect an act or decision, in order to obtain or retain business or secure any improper advantage.

- **KICKBACKS:**

The return of a portion of a payment received (or to be received) in exchange for a specific favor or benefit.

- **EXTORTION:**

Demanding or obtaining anything of value through force, threats, or intimidation.

- **FACILITATION PAYMENTS:**

Small payments made to expedite or secure routine government actions. While sometimes considered customary in certain jurisdictions, SAMA generally prohibits facilitation payments. If such a payment is unavoidable, it must be accurately recorded and reported. **(See Section 6).**

- **GIFTS AND HOSPITALITY:**

Providing or accepting gifts, hospitality, or entertainment that are excessive, lavish, or could be perceived as intended to improperly influence a business decision.

- **POLITICAL CONTRIBUTIONS:**

Making or soliciting political contributions where such contributions could be perceived as an attempt to gain an improper advantage.

PROHIBITED CONDUCT

All Representatives are strictly prohibited from engaging in any of the following:

- Offering, promising, or giving bribes or other improper payments.
- Soliciting or accepting bribes or other improper payments.
- Authorizing or participating in any corrupt activity.
- Failing to report suspected corrupt activity.
- Retaliating against anyone who reports suspected corrupt activity.

DUE DILIGENCE

SAMA will conduct appropriate due diligence on third parties, including agents, suppliers, and partners, to assess the risk of corruption associated with those relationships.

RECORD KEEPING AND FINANCIAL CONTROLS

Accurate and transparent record keeping is essential for preventing and detecting corruption. All financial transactions must be properly documented and recorded in accordance with generally accepted accounting principles.

SAMA maintains a system of internal controls designed to prevent and detect corruption.

REPORTING PROCEDURES

All Representatives have a duty to report any suspected or actual violations of this Anti-Corruption Policy. Reports can be made to **[Legal Department, HR Department, CEO Office]**. Reports can be made anonymously where permitted by law. SAMA will protect the confidentiality of individuals who make reports in good faith and will not tolerate any retaliation against such individuals.

INVESTIGATION AND DISCIPLINARY ACTION

All reports of suspected corruption will be promptly and thoroughly investigated. If an investigation reveals that a violation of this policy has occurred, SAMA will take appropriate disciplinary action, up to and including termination of employment or termination of the business relationship.

TRAINING AND COMMUNICATION

All Representatives will receive regular training on this Anti-Corruption Policy and related anti-corruption laws and regulations. This policy to be communicated to all Representatives and will be made available on company information repositories.

POLICY UPDATES

This policy will be reviewed and updated annually or more frequently as needed.

SAMA

THANK YOU