

# cicor



## **ANTI-BRIBERY & ANTI-CORRUPTION STATEMENT**

Cicor Technologies Ltd. and affiliated companies

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# Anti Bribery & Anti-Corruption at Cicor

Cicor Technologies Ltd. and its affiliated companies (hereinafter named as "Cicor") has signed this statement to demonstrate its commitment to prevent any activity of corruption and bribery which could involve breaches of relevant anti-bribery and corruption laws. This includes but is not limited to the UK Bribery Act and relevant legislation on other jurisdictions we operate. Non-compliance may be subject to disciplinary action, up to including termination of an employment or a contract.

## Preventing of bribery and corruption

As part of our Compliance & sustainability program policies and guidelines are in place to detect, prevent and mitigate the risk of bribery and corruption. Awareness and compliance with the standards are mandatory for all our business partners, employees, contractors and other stakeholders. Our Cicor standard sets out expectations on our people and those working on our behalf to prevent bribery and corruption.

### Key prohibitions and requirements

Our Cicor standard sets out the prohibitions and requirements which must be adhere to. The key areas are:

- It is expressly prohibited to engage in bribery either directly or via a third party. Bribery is defined as:
  - o offering, promising, or giving, requesting, seeking or accepting anything of value, or any other advantage
  - o to improperly influence a business decision or any other act, inaction or decision by any person
  - o in any country.
- It is expressly prohibited to bribe a public official which is defined as:
  - o offering, promising, or giving
  - o anything of value or other advantage
  - o to influence a Public Official in their role
  - o in order to win or retain business or any other business advantage
  - o in any country.

- Facilitation payments are prohibited (unless there is a genuine risk to life or wellbeing).
- Political donations and lobbying are prohibited.

### **Gifts and Hospitality**

- All gifts and hospitality given must be proportionate, reasonable and only offered as part of building or maintaining good relationships. It must not create an expectation that the giver or recipient will do something in return.
- Gifts and hospitality must never be offered, given or received, where it could influence, or be perceived to influence, a business decision or in circumstances where it would threaten Cicor's independence, integrity or objectivity in any way.
- It is prohibited to offer or give any gifts to a Public Official.
- During a commercial negotiation with a customer, supplier, gifts and hospitality must not be offered, given or accepted by (a) the Cicor team who are involved in that negotiation to/from the customer or supplier, or (b) any other Cicor person who is aware of those commercial negotiations. It is, however, acceptable to provide / receive basic refreshments as a business courtesy.

### **Charitable donations**

- It is prohibited to provide a donation or sponsorship where that would influence or could be perceived as influencing a business decision by the person or organisation receiving it.
- The donation or sponsorship must be reasonable and proportionate, and only given to support the aims of the charity which should align with our purpose and values.
- It is also prohibited to provide donations or sponsorships where they coincide with a bidding process or contract renewal negotiations.

### **Engaging third parties**

- We only engage third parties to perform services on our behalf after conducting a risk based due diligence process and after taken all appropriate steps to prevent the Third Party from committing bribery on our behalf. This includes individuals and legal entities that provide services on behalf of Cicor or that provide goods and products on behalf of Cicor.
- Other than exceptional circumstances it is prohibited to engage a Third Party who is a Public Official, or any legal entity owned or controlled by a Public Official.

# Anti-Bribery and Anti-Corruption Governance

At the most basic level, we operationalize our Anti-Bribery and Anti-Corruption obligations through our Code of Conduct, supported by a comprehensive communication and training program. More broadly, our ambition is to expand this training into more specialized programs and initiatives that seek to drive heightened awareness and capability regarding any form of corruption and bribery. This will integrate considerations into our decision-making and our broader engagement with civil society.

## **Grievances and remediation**

Any concerns arising within our business can be raised via the Integrity Line. The Integrity Line provides our employees, suppliers, customers and other stakeholders of the Company the option to confidentially report such concerns without fear of retaliation. We are committed to ensuring that all reports are appropriately heard, investigated and remediated as required.

## **Governance and monitoring**

Ultimate responsibility for this statement sits with the Cicor Group Compliance department. Cicor Group Compliance regularly update and monitor our commitment to acknowledge and uphold standards against corruption and bribery. Policies, guidelines and standards including those covering anti-bribery and anti-corruption standards are approved by the Cicor Group Management Team. Our commitments are global and apply throughout our value chain. Policies and procedures, including those relevant to anti-bribery and anti-corruption standards are binding on all Cicor associates. Our key documents governing human rights include but are not limited to:

- Cicor Employee Code of Conduct which sets out our overall global commitment to conduct business in an ethical manner including anti-corruption and anti-bribery standards
- Cicor Business Partner Code of Conduct which requires our business partners with whom we engage to adhere to our anti-bribery and anti-corruption and strongly encourage them to fully embed prevention of corruption and bribery into their organisation.

Several other guidelines are relevant to our human rights priority areas as shared in our Cicor Compliance & Sustainability program. We review and integrate Anti-Bribery and Anti-Corruption approaches into the management systems governing relevant parts of our business.

# Approval

The Cicor Group Management Boards has approved this statement. This statement will be reviewed every two years and revised, if necessary, to continue to ensure its relevance in the course of time

# Disclosure

We communicate and report on our approach as part of our annual report shared on our website including key issues raised and actions taken. Our disclosures are reviewed as part of the assurance process of our annual reporting.

Bronschhofen, dated December 3rd, 2024

## **For Cicor Group and its affiliated companies**

\_\_\_\_\_  
Alexander Hagemann, CEO

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