

Siat is committed to conducting all its activities with the highest standards of integrity, ethics, and good governance. The Group promotes a culture based on its core values: A strong sense of ownership, acting in the long-term interest of the Company, teamwork, accountability, customer focus, continuous improvement, and disciplined execution. Siat expects all employees, directors, contractors, suppliers, and partners to act ethically, comply with applicable laws, and always uphold this Policy. The Board and top management demonstrate active leadership and ensure compliance with this Policy.

PRINCIPLE

Siat commits to:



- Acting with integrity, ethics, and full compliance.
- Ensuring transparency and accountability.
- Preventing corruption, bribery, and money laundering.
- Avoiding conflicts of interest.
- Promoting professional and ethical conduct.
- Protecting confidentiality and personal data.
- Maintaining political and religious neutrality.

IMPACT PREVENTION



Siat identifies and manages governance and ethics risks through:

- Systematic risk assessment, including corruption, fraud, and compliance risks.
- By prohibiting all forms of fraud, money laundering, and unethical conduct
- Implementing controls to prevent misuse of company assets and conflicts of interest.
- Integrating of sustainability and risk considerations into decision-making at all levels of the organization.
- Defining risk appetite, validated by appropriate governance bodies.

CERTIFICATION AND CONTINUOUS IMPROVEMENT



- Identifying and assessing adverse impacts in its own operations and supply chain, and using this information to identify, report, and mitigate risks.
- Siat implements a Governance and Ethics System with a continuous improvement loop (e.g. aligned with ISO 37001), including risk assessment, due diligence, internal controls, training, and monitoring to prevent, detect, and respond to risks.

TRANSPARENCY AND ACCOUNTABILITY



Siat promotes transparency by:

- Ensuring the accuracy and reliability of records, reports, and disclosures.
- Cooperating fully with authorities and regulatory bodies.
- Maintaining proper documentation in compliance with applicable laws.
- Supporting transparent internal and external audits.

RESOURCE ALLOCATION



Siat allocates appropriate resources to implement this Policy, including:

- Training and awareness programs. Employees and relevant stakeholders receive regular training on ethics and compliance.
- Compliance systems and internal controls.
- Whistleblowing mechanisms and investigation processes.

GOVERNANCE AND BOARD



Siat ensures strong governance through:

- A balanced and effective Board of Directors acting in the best interest of the Company.
- Board diversity in terms of gender, experience, skills, and knowledge.
- Independent judgment, integrity, and accountability at both Management and Board level.
- Regular evaluation of governance performance and disclosure practices.
- Advisory and specialized committees supporting risk, audit, and ESG oversight.
- Siat appoints a compliance function with the authority and independence to oversee the implementation of this Policy.

STRATEGIC PILLARS CONSISTENT WITH THE GROUP'S LONG-TERM DIRECTION

- Have the right people from field workers to board of director aligned and focused on strategy execution.
- Robust risk management and control to minimize leakages and wastages (inefficiencies and losses).
- Zero tolerance for anti-values and unethical conduct.

METRICS AND PERFORMANCE TARGETS

Siat defines measurable Ethics and Governance objectives, including:

- Internal and external audits findings.
- Corruption incidents.
- Number of whistleblowing reports received.
- Number of leakages detected.
- Training completion.
- Audit closure rate.

DETAILED IMPLEMENTATION POLICY IS DEFINED IN SEPARATE OPERATIONAL DOCUMENTS, POSTED ON ALL SUBSIDIARIES BOARDS.

Siat is committed to maintaining an ethical working environment for all employees, visitors, and subcontractors involved in its operations and supply chain. This policy serves as a communication tool to convey Siat's values and expectations to all employees, subsidiaries, partners, and associates, with the expectation that they fully adhere to and implement this, Policy. Any breach of this Policy may result in disciplinary action, up to and including termination.

INTEGRITY, ETHICS AND COMPLIANCE

Siat commits to promoting transparency and ensuring full compliance with international, national, and local laws, regulations, and applicable standards.

- Preventing corruption and bribery in line with internationally recognized frameworks such as the OECD Anti-Bribery Convention.
- Ensuring that gifts and hospitality remain reasonable, transparent, and never influence business decisions.
- Promoting fair competition and ethical business practices.

ANTI-CORRUPTION AND ANTI-BRIBERY

Siat strictly prohibits:

- Any form of corruption, bribery, facilitation payments, or kick-backs.
- Offering, giving, or receiving anything of value to improperly influence business decisions.
- All payments must be transparent (no cash, no off-book accounts).

ANTI-MONEY LAUNDERING

Siat commits to:

- Preventing involvement in money laundering or terrorist financing.
- Conducting due diligence on business partners.
- Reporting suspicious transactions in accordance with applicable laws.

CONFLICTS OF INTEREST

All employees and partners must:

- Avoid situations where personal interests conflict with company interests so that even slight doubt about integrity is not raised.
- Declare any actual or potential conflicts of interest.
- Refrain from participating in related decision-making.

INTEGRITY AND PROFESSIONAL CONDUCT

Siat requires:

- Honest, fair, and respectful dealings with all stakeholders.
- No abuse of authority, manipulation, or unfair practices.
- Professional behaviour in all business interactions.

CONFIDENTIALITY AND DATA PROTECTION

Siat ensures:

- Ensuring that all confidential information is used solely for legitimate business purposes.
- Protection of confidential business information.
- Compliance with applicable data protection laws.
- Proper use and retention of data in line with legal requirements.

USE OF COMPANY ASSETS

Siat assets must:

- Be used responsibly and for legitimate business purposes.
- Not be used for personal gain or unauthorized activities.

INSIDER TRADING

Siat prohibits:

- Use of non-public, price-sensitive information for personal or third-party benefit.
- Any form of insider dealing or market abuse.

PRODUCT QUALITY AND SAFETY

Siat commits to:

- Ensuring the quality and safety of its products.
- Complying with applicable food safety and quality standards.
- Maintaining traceability and responsible production practices.

WHISTLEBLOWING AND PROTECTION

Siat provides:

- Safe, accessible, and confidential whistleblowing mechanisms.
- Protection against retaliation for individuals raising concerns in good faith.
- Proper investigation and follow-up of all reported concerns.

COMMUNICATION AND EXTERNAL REPRESENTATION

Siat requires:

- Responsible use of the company's name, image, and reputation.
- Compliance with internal rules on communication and social media.
- Prior authorization for public statements on behalf of the Group.

POLITICAL AND RELIGIOUS NEUTRALITY

Siat ensures that:

- Political or religious activities do not interfere with company operations.
- The company remains neutral and independent in its business activities.

COLLABORATION AND AUDIT TRANSPARENCY

Siat commits to:

- Full cooperation during internal and external audits.
- Transparent sharing of relevant information.
- Continuous improvement based on audit findings.

RECORDS AND REPORTING INTEGRITY

Siat ensures:

- Accurate, complete, and reliable records.
- No falsification, misrepresentation, or omission of information.

STAKEHOLDER ENGAGEMENT (GOVERNANCE PERSPECTIVE)

Siat commits to:

- Treating all stakeholders fairly and respectfully.
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- Identifying, preventing, and mitigating governance-related risks.
- Promoting ethical practices across its value chain.

Should you need additional information on Governance, Ethic and related matters, please contact the Sustainability Department, or visit our website: www.siat-group.com for complaint or suggestion kindly use the form online.