



Group Anti-Bribery and Anti-Corruption Policy (Group ABC Policy)

Content

Content	2
1. Purpose	3
2. Range of application, range of validity	3
3. Main Responsibility	3
3.1. All Employees	3
3.2. Leaders	3
3.3. Compliance function and Group Legal Department	4
4. Procedure/specifications	4
4.1. Definitions	4
4.2. General principles	5
4.2.1. Doing business legally and ethically	5
4.2.2. Bribery and corruption prevention	5
4.2.3. Avoid conflict of interest	6
4.2.4. Approvals, records and transparency	6
4.3. Risk Areas	6
4.3.1. Dealing with Public Officials	6
4.3.2. Facilitation payments	7
4.3.3. Gifts, hospitality and entertainment (benefits)	7
4.3.4. Samples and free goods	7
4.3.5. Donations and Sponsorship	8
4.3.6. Political contributions	8
4.3.7. Public policy advocacy	8
4.3.8. Employment-related risks	9
4.3.9. Business Partners	9
4.3.10. Third-Party Intermediaries	9
4.3.11. Mergers and acquisitions	10
4.4. Speak up	10
4.5. Consequences of breach	10
5. Related documents	11
6. Abbreviation/Legend	11

Some links included in this document point to internal Semperit SharePoint resources. These links may not be accessible to external parties. If you require any further information, please contact the Compliance Department: compliance@semperitgroup.com

1. Purpose

This Group ABC Policy provides an overview of Semperit's commitment and principles against bribery and corruption.

Semperit is committed to conducting business with integrity and transparency and has zero tolerance for bribery and corruption. Our business relies on the trust we build with our customers, suppliers, and other business partners. Offering, paying or receiving bribes or kickbacks breaks this trust. Corruption would eventually reduce the quality of our products and services, increase their prices, damage our reputation, and expose us to severe consequences like fines, lawsuits, criminal charges, loss of business, and even being banned from public tenders.

Semperit is expected to abide by anti-bribery and anti-corruption laws in all jurisdictions in which it operates. Where local laws, regulations, or our internal procedures set stricter rules than those in this Policy, the most restrictive requirements must be followed. For certain entities of the Semperit group, more stringent practices, considering local legal requirements, may, therefore, be established.

The Group Anti-Bribery and Anti-Corruption Policy (Group ABC Policy) and related Group ABC Guidelines, as a part of Semperit's [Group Anti-Bribery and Anti-Corruption Programme](#) set principles, standards and ethical expectations that all employees and third-party intermediaries acting on behalf of Semperit must follow.

2. Range of application, range of validity

This Policy applies to all employees, leased personnel, directors, and board members. It applies to any legal entity in which Semperit directly or indirectly has a holding of more than 50%.

Semperit also fosters anti-corruption along its supply chain and expects its business partners, especially freelancers or third-party intermediaries acting for and on behalf of Semperit, to adhere to the principles of this Policy. Semperit's [Supplier policy](#) is a means to achieve this goal.

This Policy applies to interactions, business dealings, and transactions with our stakeholders, existing or prospective customers, suppliers, third-party intermediaries, or other business partners and public officials in all countries in which Semperit, or its subsidiaries, operates.

Where local laws are more restrictive than the requirements in the documents mentioned above, the more restrictive requirements must be followed.

3. Main Responsibility

3.1. All Employees

All Employees are:

- required to avoid and prevent any activity that might constitute, lead to, or suggest bribery and/or corrupt activities
- responsible for conducting themselves in an ethical and compliant manner- to comply with laws, Code of Conduct, this Group ABC Policy, and the corresponding rules and procedures
- obliged to register gifts, hospitality, and entertainment; donations and sponsorships in line with Group ABC guidelines
- required to report any actual or attempted acts of bribery and corruption
- consult the Group Compliance Department and Local Compliance Coordinators immediately when suspicious activities (Red Flags) are identified.

3.2. Leaders

Managers and leaders at all levels are responsible

- to implement and oversee this Group ABC Policy and specific Group ABC guidelines within their area of functional responsibility,
- to guide their employees,
- demonstrate a high level of personal integrity and communicate the highest standards of ethical behaviour
- support a speak up culture and report any violation to the Group Compliance Department and Local Compliance coordinators and the directors of the respective legal entity
- where necessary or advantageous in order to follow stricter local laws or practices, set higher local standards and thresholds in written form, and use a local guideline or similar.

3.3. Compliance function and Group Legal Department

The Compliance Board is responsible to:

- implement, execute, and approve Group ABC Policy and specific Group ABC guidelines, as well as decide on the status of the investigation of cases.

The Group Compliance Officer and the Senior Group Compliance Manager are responsible to:

- oversee the design and implementation of the Group ABC Policy and related Group ABC guidelines
- support and monitor the implementation of the rules
- provide guidance and assistance to Employees
- investigate (escalate to the Compliance Board and, if necessary, to the relevant authorities) and support (local) investigations
- support the due diligence process for business partners
- provide advice on and opinions related to major anti-bribery and corruption matters.

Local Compliance Coordinators are responsible for:

- local implementation of this Group ABC Policy and related Group ABC guidelines
- coordinating the activities directed by the Group Compliance Department following all relevant local legal and regulatory requirements
- providing guidance and assistance to employees
- providing local training
- overseeing the controls implementation
- local investigation (involving the Group Compliance Department, whenever appropriate) and escalating cases to local management and, if necessary, to the relevant authorities
- translate into the local language and communicate this Group ABC Policy to internal and, where appropriate to external stakeholders
- liaise with and report to the Group Compliance Department any suspicion, actual or attempted acts of bribery and corruption and to the Group Legal Department any suspicion of money laundering
- providing advice on and opinions related to anti-bribery and corruption matters.

4. Procedure/specifications

4.1. Definitions

Corruption is any form of abuse of entrusted power for private gain at the expense of Semperit or others, or providing someone with an improper advantage.

Bribery is giving, offering, promising, authorising, providing, requesting, accepting, receiving, agreeing to receive, encouraging or soliciting a financial or other undue advantage (directly or indirectly, and irrespective of location) with the purpose of influencing or rewarding any person's action, inaction or a decision to obtain or retain business. It does not matter whether the bribe is intended for the benefit of the recipient or the benefit of anyone else at the request of or with the knowledge, acquiescence, or approval of the recipient.

Anything of value: this includes but is not limited to

- **financial advantages-** cash or cash equivalents (vouchers or gift cards), facilitation payments, kickbacks, overpayment, political contributions, donations, sponsorships, loans, excessive commission rates, or other tangible assets to influence someone's decision or action or
- **non-financial advantages-** favours, or advantages, jobs or referrals, training and educational services, travel, gifts, entertainment and hospitality, securing contracts or favourable contract terms, business opportunities, conditions below or above market value, any other rewards and advantages such as preferential treatment, use of materials or facilities, access to information and others to influence someone's actions.

Employees are all individuals, whether temporary or permanent, full-time and part-time, working at all levels for Semperit, including interns, trainees, contingent workers or apprentices.

Third-party intermediaries are individuals or entities engaged or instructed to act for or on behalf of Semperit, regardless of whether towards customers, suppliers, or public officials.

Business partners are individuals or entities that Semperit does business with and mainly include customers and suppliers (including freelancers and similar).

Foreign or domestic government official / public official is to be understood broadly and includes domestic officials or officials in a foreign country, whether appointed, elected or by succession, whether permanent or temporary, whether paid or unpaid, irrespective of that person's seniority:

- any person holding a public function- legislative, administrative or judicial office in any branch of a national, local or municipal government
- any person acting in an official capacity for or on behalf of a public function, government, public agency, public enterprise or organisation, or businesses which are wholly or partly owned or controlled by governments
- any official or agent of a public domestic or international organisation
- any political party official or candidate for public office
- a close relative (spouse/partner, child, child of spouse/partner, parents, stepparent, siblings, step-siblings, in-laws, aunt, uncle, niece, nephew, first cousins, grandparent and grandchildren or any other family member) of any of the above.

Conflict of interest are circumstances when personal, financial, or other interests of an employee (including their family or close friends) could influence, or appear to influence, an employee's professional judgement, performance, or decisions to the detriment of Semperit.

Benefit are anything of value granted to or received by a third party.

4.2. General principles

Employees and third-party intermediaries must not engage in any form of corruption in doing business with or for Semperit. They must never pay bribes, regardless of local customs or local practice: it is strictly forbidden to offer, authorise, pay, solicit or accept anything of value for the purpose of influencing an official act or decision or for the purpose of obtaining and retaining business.

Semperit does not tolerate employee involvement in any form of corruption or bribery, whether it is to a public official or a private individual. We expect our business partners to do the same. We will take appropriate action in case of any violation against the principles of this Policy.

These general principles apply to all risk areas explained in Section 4.3.

4.2.1. Doing business legally and ethically

Each employee shall act with integrity and in line with the Semperit [Code of Conduct](#) regardless of place, time, or position. Employees shall always abstain from any act of corruption and fulfil the promises made by Semperit to earn the trust of Semperit stakeholders.

Employees achieve business success with professional, ethical behaviour:

- any business interaction or any decision must be in line with our values and made following applicable laws, regulations and Semperit principles
- any business interaction must have an appropriate business purpose
- payments to business partners are made only for services or products adequately provided at an honest, fair, reasonable value in line with standard business practices
- employees must not offer or accept any incentives that are intended to improperly influence decisions to gain or retain a business advantage.

4.2.2. Bribery and corruption prevention

Semperit does not accept bribery or corruption in any form, and employees shall stay focused on our commitment to zero tolerance for bribery and corruption.

Employees are responsible for preventing, detecting, and reporting any form of corruption, fraud or bribery. They shall especially:

- pro-actively act against any corrupt business practices
- be diligent and aware of situations that could put Semperit and/or themselves at risk of being or being perceived as corrupt
- avoid any activity that might constitute, lead to, or suggest bribery and/or corruption activities

- raise a concern with their leaders or managers and the Group Compliance Department and/ or Local Compliance Coordinators if suspicious activities are identified or if they suspect or witness corruption or bribery.

It is strictly prohibited to:

- abuse entrusted power for private gain and provide someone with an improper advantage
- offer, promise, give or authorise, request, accept, authorise or solicit bribes or kickbacks and other improper advantages of any kind, including facilitation payments, either directly or indirectly, to a domestic or foreign government/ public official or a private individual
- improperly influence a business decision or government action
- allow any pressure that would endanger our zero tolerance for bribery and corruption.

4.2.3. Avoid conflict of interest

Employees and third-party intermediaries who act on Semperit's behalf are expected to act at all times in the company's best interest and exercise sound judgment, unaffected by private interests or divided loyalties. Private interests or relationships must not influence professional decisions.

While not all conflicts of interest situations necessarily involve improper or corrupt behaviour, corruption almost always requires a conflict of interest. A conflict of interest creates corruption risk when an employee doesn't disclose conflicts. This improper behaviour may expose an employee to extortion demands or be the first step to bribery. Employees shall also prevent situations that others or the public perceive as conflicts of interest.

To avoid corruption risks, employees shall promptly disclose any interest or situation that conflicts, may appear to conflict, or could be perceived to conflict with their professional duty or tasks for Semperit to their leader with the Group Conflict of Interest Policy [QP B G 1133](#).

4.2.4. Approvals, records, and transparency

Employees shall implement and follow procedures, (financial) controls, and approvals and keep records to manage our bribery and corruption risks:

- follow all relevant financial controls and approval processes
- accurately and transparently record all expenditures, or receivables or any other type of compensation made to business partners and properly document them in reasonable detail in Semperit's corporate books, records, and accounts
- make sure that actual received or given services or products are in line with the ordered and approved expenditure
- ensure that paid and invoiced service/goods were received and in line with the planned and approved expenses, are verified, and remain available during subsequent years
- not establish or use 'off-book' accounts, undisclosed or unrecorded funds, assets or transactions for any purpose
- not provide false, deceptive, incomplete, inaccurate, or artificial entries in Semperit books and records
- not use personal funds or third parties to circumvent Semperit procedures and controls.

To comply with the ABC laws' accounting provisions, best practices and recommendations must be followed in the Internal Controls Guideline [QP B G 1135](#) and other internal standards.

Semperit shall keep a register of benefits, donations, and sponsorships with approvals to enable monitoring and control. Each employee must record granting or receiving benefits, donations, and sponsorships and get proper approvals following the Group ABC guidelines.

4.3. Risk Areas

All requirements in Section 4.3 must be followed based on the general principles (Section 4.2). Local laws might impose stricter rules than those in this Group ABC Policy, especially if an employee is, directly or indirectly, dealing with public officials. In doubt, employees should consult the Group Compliance Department or the Group Legal Department.

4.3.1. Dealing with Public Officials

Public officials are often subject to stricter laws and regulations. In certain jurisdictions, even a tiny courtesy offered to public officials, which may be accepted in the private sector, can be strictly forbidden. Employees must observe applicable (local) laws and regulations.

Employees and Semperit's third-party intermediaries are strictly prohibited from offering, promising, or giving anything of value, whether directly or indirectly, to any public official or their family members (or to any other person) with the intent to influence that official's actions or decisions in their official capacity.

Employees have to be especially careful when directly or indirectly dealing with or assisting public officials, participating in public tenders, doing business with entities which are owned, controlled or managed by a public official (enhanced business partner check must be performed) or hiring a public official or a candidate suggested by a public official.

Direct leaders or managers must pre-authorise and review all exceptions, and the Group Compliance Department and the Local Compliance coordinator's opinion must be obtained before any action. Employees must follow this Policy and Group ABC guidelines.

4.3.2. Facilitation payments

In certain jurisdictions, public officials may demand and/or expect facilitation payments, known as small bribes (money, vouchers, alcohol or cigarettes, perfumes or tickets) for carrying out or speeding up routine services they are legally required to provide to the applicant. Sometimes, they may be backed by the threat of a fine or other adverse consequences if the payment is not provided.

Employees and third-party intermediaries are strictly prohibited from offering, promising, paying, or authorising the payment or accepting facilitation payments directly or indirectly through a third party to secure faster processing of public services (e.g. obtaining permits, certificates, licenses, approvals, administrative procedures, documents for business purposes or providing customs clearances and similar).

If an employee is asked to make a facilitation payment, the employee must refuse and inform the respective leader and compliance immediately.

4.3.3. Gifts, hospitality and entertainment (benefits)

Employees shall approve benefits proposals only if they demonstrate a clear, legitimate business purpose and are modest and appropriate for the nature of the business relationship.

Employees and third-party intermediaries may offer or accept benefits only if they are following local laws and regulations of both the giver and the recipient. This Group ABC Policy, the Group Gifts, Hospitality and Entertainment Guideline and other internal standards must be followed. Some countries may have stricter laws than the principles outlined in Semperit's policies and rules. In these cases, the more stringent rules apply.

Employees and third-party intermediaries are strictly prohibited from giving or accepting benefits regardless of their value in the following situations:

- to encourage, reward or undue influence a decision,
- to obtain any improper or undue advantage
- if the benefits are cash or cash equivalent (vouchers, reward cards)
- if benefits create or are likely to create conflicts with any of the employee's duties
- if benefits are given to public officials or individuals associated with public officials without prior approval of the direct leader and the opinion of the Group Compliance Department or Local Compliance Coordinators
- if there is a current bid or business discussion involving a public official or their department
- when they compromise the integrity or reputation of Semperit.

Employees must accurately and completely record and disclose benefits above certain local thresholds and obtain approvals in accordance with Semperit's [Group Gifts, Hospitality and Entertainment Guideline](#), or the threshold for benefits set according to local laws and regulations.

4.3.4. Samples and free goods

Employees may ship or receive samples and free-of-charge goods in limited value and frequency when they are provided with a legitimate business purpose, such as allowing testing, a part of a formal tendering process, or compensation for a claim.

Excessive samples and free-of-charge goods can be perceived as bribes as they have a specific sales value and can be sold on the end market.

4.3.5. Donations and Sponsorship

Semperit is committed to responsible corporate behaviour in communities where it operates, being socially responsible through charitable contributions, donations and sponsorships. Semperit does not support recipients whose reputation or objectives are incompatible with Semperit's Values or Code of Conduct.

It is permitted to grant customary and reasonable charitable contributions, donations or sponsorships if they serve a legitimate purpose, align with our Values, [Code of Conduct](#), the [Group Donations and Sponsorship Guideline](#) and other internal standards and are permissible and appropriate under local law.

Donations to profit-oriented organisations are inadmissible.

Employees may never make charitable contributions, donations or sponsorships:

- to disguise a bribe, kickback, or corrupt practice
- to gain an improper business or other advantage quid pro quo
- in physical cash, currency, or gift cards
- when it conflicts with any of the employee's duties or constitutes any actual, perceived or potential conflict of interest situation
- that improperly directly or indirectly benefits a person or public official
- that influence or might influence a public official or other third parties' decisions
- for improper purposes, such as returning a favour
- that directs business to Semperit
- that could influence a current bid or where a decision is being sought from a public official
- as an ad-hoc transaction
- to projects that require any confidentiality about the contribution
- to organisations that have engaged in corruption or other unethical conduct
- if they are prohibited by law or regulation.

The [Group Donations and Sponsorship Guideline](#) provides guidance for corporate charitable, philanthropic contributions, donations, community projects, and sponsorships, as well as their disclosure and approvals.

All transactions must be accurately and completely recorded, registered, and disclosed in the books and records in compliance with internal standards.

4.3.6. Political contributions

Political contributions in any form or value, whether monetary or in-kind (including time expended by paid employees during working hours), to any political party, party officials, committee, candidate for a political office, or elected public official are strictly prohibited.

Employees may not promise or make any (in-kind) contributions of any funds or resources on behalf of or as a representative of Semperit towards any political campaign, political party, political officials, political candidate, or any politically affiliated organisation.

Employees may never suggest, promise, or offer any contributions in exchange for or a promise to perform any act that may influence any business relation or contract award.

If an employee is politically engaged, the employee must participate in this engagement in a personal capacity only, not as a Semperit employee.

4.3.7. Public policy advocacy

Semperit is a member of trade associations or other business groupings that promote legislation, regulations, and government policies that are favourable to the sector.

Any public policy advocacy involvement of Semperit must be legitimate, legal, ethical and transparent, clearly linked to Semperit's business purposes and strategic intent, clearly supportive of Semperit's shareholders' interests, and approved in advance.

Legal requirements that regulate and restrict the legal lobbying activities of the private sector require Semperit to log and disclose its public policy advocacy activities and key relationships with trade associations that engage in public policy advocacy on Semperit's behalf. It is prohibited to seek undue benefits for special interest groups and provide any benefits, as public officials may be subject to stricter laws.

4.3.8. Employment-related risks

Employees may not give, offer or promise any type of employment or any type of internship, development opportunities, promotions, transfers, compensation reviews, or trainings to obtain or retain an undue business advantage.

The recruitment processes must be transparent and objective and must include anti-bribery controls. All HR practices shall be made based on merit and, when applicable, competitive process.

All employees must be hired solely based on merit, ability, and Semperit needs. When someone is solicited directly or indirectly by any third party known to have any formal or informal relationship with Semperit or by a public official, a person associated with a public official or a candidate suggested by a public official, the process shall be subject to objective assessment, documented and shall involve the explanation that any decision wasn't made on the request of a third party. Employees must consult the Group Compliance Department before hiring a public official, a person associated with a public official, or a candidate suggested by a public official.

4.3.9. Business Partners

Semperit identifies and registers its business partners and collects, analyses and stores relevant information about them (ownership, how they operate, their integrity, anti-corruption standards and any significant bribery and corruption risks).

When dealing with business partners, employees shall:

- initiate or perform background checks on new and existing business partners (suppliers, customers), use a risk assessment process to identify, segment, mitigate and monitor risks for bribery and corruption and ensure periodical checks. The Group Business Partner Check Guideline describes the process, roles and responsibilities.
- always make payments only for services or products adequately provided at fair value. All procurement activities shall be performed in compliance with the [Procurement Guideline](#)
- ensure that financial transactions are checked to prevent money laundering
- advocate free and fair trade, strive for forthright competition and ethical conditions, and respect the legal frameworks of the countries in which Semperit operates.

Semperit can be held responsible for the conduct of its business partners. Therefore, employees must exercise due care when engaging with them. Employees must follow the [Group Business Partner Check Guideline](#), QP B G 1128 [Contract Guideline](#) and QP B G 1104 [Procurement Guideline](#) before starting any business with Business Partners.

4.3.10. Third-Party Intermediaries

Semperit may onboard and use third-party intermediaries, which are engaged to provide services or engage in business activities for or on behalf of Semperit:

Third Party Intermediary (TPI) is an individual or entity that is engaged or instructed to represent, act for or on behalf of Semperit but is not an employee, director or board member of Semperit

- **towards end- customers (typically in sales environment)** such as sales representatives, sales agents, and also consultants in sales and marketing, business development, technical areas, technical design, and advice companies.
- **towards Public Officials** such as customs brokers or agencies, local freight forwarding companies, lawyers dealing with licensing, regulatory matters or disputes, accountants and advisers who interact with authorities, consultants supporting registrations with the government (e.g. obtaining a building permit for plant enlargement), health and safety and environmental consultants who may interact with relevant area officials, shippers and freight forwarders who interact with port and customs officials, visa processors, and other third parties who engage with state-owned entities on Semperit's behalf.

Third-party intermediaries are not Semperit employees and are not service or goods providers/suppliers.

Third-party intermediaries may act on Semperit's behalf in connection with marketing or sales, negotiate contracts, obtain licenses, permits or other authorisations, or any other actions that benefit Semperit or as subcontractors in the supply chain.

Semperit may be held responsible for any third-party intermediary engaging in bribery or any other illegal activity, especially when dealing with public officials. For this reason, we require third-party intermediaries to conduct their business in compliance with the Semperit Code of Conduct and Supplier Guideline and with all applicable laws and regulations enacted to combat bribery and corruption. Should the third-party intermediaries have their own Code of Conduct or relevant policies and procedures addressing these topics, they must be considered consistent with the principles underpinning Semperit's mentioned internal standards and commit to full compliance with them. They must acknowledge the principles of our [Code of Conduct](#) and follow our ethical standards.

As they present a high risk for corruption and bribery, employees must follow the Group Third Party Intermediaries Guideline [QP B G 1132](#) and:

- not accept any form of bribery, and corruption
- perform an appropriate level of due diligence and periodic monitoring, including Business Partner Check
- investigate and document any red flags
- obtain all required approvals and documentation before engaging them
- ensure that any engagement with a sales agent is recorded in a standard written legal agreement, which includes details about the engagement, required ABC, and control provisions
- follow internal processes to properly document the receipt of the services in reasonable detail in Semperit's corporate books, records, and accounts.

Where Semperit becomes aware that any third-party intermediary is involved in bribery or other corrupt activity, this may terminate the engagement, and other appropriate actions.

4.3.11. Mergers and acquisitions

The mergers and acquisitions are conducted according to Semperit's internal mergers and acquisitions process, which stipulates principles for practising due care and performing anti-corruption due diligence procedures. Where Semperit acquires the right to control or operate a business, Semperit promptly implements this Group ABC Policy, associated procedures, and controls.

4.4. Speak up

Employees must immediately report any suspected violation of anti-bribery and anti-corruption laws, regulations or this Group ABC Policy. Reports or concerns on bribery and corruption can be made to the direct leader (if possible), Group Compliance Department and Local Compliance coordinators (compliance@semperitgroup.com or [Local Compliance Coordinators](#)) or through [SemperLine](#), which allows anonymous reporting as permitted by applicable law. Failure to make such a report may expose Semperit to potential legal or regulatory actions or, in some jurisdictions, give rise to individual criminal liability on the part of the relevant employee. SemperLine is also publicly available to business partners and other stakeholders.

All reported concerns are recorded, and an internal review is conducted. Any kind of information will be handled confidentially. Upon request, the anonymity of the information source will be ensured.

Semperit will not tolerate retaliation against an employee for reporting a concern in good faith or cooperating with a compliance investigation. Employees can consult their leaders or the Group Compliance Department if they have any questions or concerns relating to this Group ABC Policy.

4.5. Consequences of breach

Semperit will take appropriate actions in case of a breach of this Group ABC Policy. Depending on the severity of the breach, consequences may range from a warning to termination of the engagement. Where appropriate and permitted by law, Semperit will report such matters to relevant regulatory authorities. Violations of local law may result in penalties or criminal prosecution.

Based on the investigation's final report by the Group Compliance Department, the Compliance Board has complete discretion in deeming what disciplinary action is both fitting and necessary.

No employee will ever suffer disciplinary action for refusing to pay bribes or reporting suspicion of bribery, even if such refusal may result in Semperit losing business.

Violations of laws and regulations may result in penalties or criminal prosecution.

5. Related documents

- [Semperit Code of Conduct](#)
- [QP B G 1104 Procurement Guideline Semperit Group](#)
- [QP B G 1128 Contract Guideline](#)
- [QP B G 1132 Group Third-party Intermediary Guideline](#)
- [QP B G 1133 Group Conflict of Interest Guideline](#)
- [QP B G 1134 Group Donations, Sponsorship Guideline](#)
- [QP B G 1135 Internal Controls Guideline](#)
- [QP B G 1142 Group Gifts, Hospitality and Entertainment Guideline](#)
- Group Business Partner Check Guideline
- Group Speak Up Guideline

6. Abbreviation/Legend

ABC	Anti-Bribery and Anti-Corruption
Group ABC Guidelines	Group Gifts, Hospitality and Entertainment Guideline Group Donations, Sponsorship Guideline Group Third-party Intermediary Guideline Group Business Partner Check Guideline
Semperit	Semperit Group and its legal entites
HR	Human Resources