

ANTI BRIBERY AND ANTI CORRUPTION POLICY

INTRODUCTION AND PURPOSE

This policy commits PMG to conduct business ethically and with the utmost integrity in all its operations throughout the world.

The policy requires compliance with all applicable laws and regulations on bribery and corruption, including, but not limited to, other applicable national anti-bribery statutes and implementing rules and regulations.

The policy's purpose is to outline and explain the prohibitions against bribery and corruption in all PMG's operations, highlight the specific compliance requirements relating to these prohibitions, and reinforce the commitment to conduct business globally with the highest level of honesty and integrity. Violating applicable anti-corruption laws exposes the Group, its employees, and any third-party intermediaries (regardless of nationality or location of residence) to potentially significant criminal and civil liability, fines, and penalties.

Notwithstanding the above, the rationale for this policy is not just legal compliance: corruption is a major obstacle to poverty reduction and, by endorsing this policy, PMG's Board of Directors reiterates its strong commitment to adhering to the relevant standards set out in the Convention Against Corruption.

PMG does not authorize or tolerate any business practice that does not comply with this policy.

SCOPE

This policy applies globally to the management & employees of PMG.

REQUIREMENTS

1. PROHIBITED AND RESTRICTED PAYMENTS

1.1. Offering, promising, and authorizing the giving of money, or anything else of value, to a government official to secure an improper advantage is strictly prohibited.

1.2. No employee may offer, give, promise, or receive money, or anything else of value, to or from an individual or entity in the private sector to obtain an improper advantage.

1.3. Even the mere act of offering is prohibited, regardless of whether the intended recipient accepts the item of value.



1.4. The prohibition covers cash payments, benefits, and favours. It also covers otherwise legitimate business expenditures such as gifts, entertainment, travel, donations, sponsorships, or training in certain circumstances.

1.5. The payments mentioned above are prohibited regardless of whether they are made directly or indirectly through third-party intermediaries.

2. PERMISSIBLE PAYMENTS

2.1. This policy permits employees to provide modest gifts, hospitality, or certain other things of value to government officials and private individuals that are legal and directly related to promoting or demonstrating PMG services.

2.2. When deciding whether a gift is appropriate, employees must consider any past, pending, or future business or administrative matters that are within the recipient's realm of influence. Employees must consider the timing and context of such gifting to assess whether any gifting could objectively be perceived as bribery.

Detailed information on the circumstances under which certain things of value may be provided, can be found in the Gifts, Entertainment & Donations Manual.

3. TRAVEL, EDUCATION AND RELATED EXPENSES INVOLVING GOVERNMENT OFFICIALS

3.1. PMG may accept requests to host government officials for training or other business-related purposes either at the PMG facilities or at training events sponsored by outside vendors. PMG may also accept requests to host government officials at operational meetings, project meetings or other events.

3.2. The payment of travel expenses to any government official, within or outside their home country, requires the prior written consent of the compliance representative to ensure consistency with this policy and any applicable laws of the official's country.

4. CHARITABLE DONATIONS AND SPONSORSHIPS

PMG supports the making of contributions to the communities in which it does business and permits reasonable donations to charities and sponsorships. In this respect:

4.1. Reasonable steps must be taken to verify that any such contribution does not constitute an illegal payment to a government body or official or any individual in violation of this policy.

4.2. It may be permissible to make donations directly to a government agency (rather than to an individual government official) as part of a charitable effort or promote goodwill through actions such as providing free products government-sponsored celebration.



4.3. All donations must adhere strictly to the requirements set out in the Gifts, Entertainment.

& Donations Manual and may not be used to influence business decisions improperly.

5. THIRD PARTIES

5.1. PMG can be held liable for the actions of third parties, where a third-party intermediary performs services or otherwise conducts dealings, discussions, or negotiations with public or private organizations for or on behalf of PMG.

5.2. PMG may be held responsible for the actions of third parties in, for example, giving or accepting bribes.

5.3. PMG may also be held accountable for failing to take sufficient steps to prevent third parties from participating in bribery or related conduct, whether PMG was aware of the alleged improper conduct.

5.4. Third parties must never be asked to engage in or condone any conduct that employees are prohibited from engaging in themselves under this policy.

5.5. Also, an employee must never turn a blind eye to suspected violations of this policy by third parties or disregard otherwise suspect circumstances.

5.6. All third parties conducting business with, for or on behalf of PMG are required to act with the highest level of business, professional and legal integrity.

5.7. PMG must never enter any relationship with a third-party intermediary who will have substantive interaction with government officials on behalf of PMG without first inquiring into the third party's background, qualifications, and reputation.

5.8. The essential steps PMG can take to protect itself from liability for improper payments made by a third party are to choose its business partners, including agents and consultants carefully.

5.9. Any employee seeking to establish a business relationship between PMG and a third party must carefully review and follow a due diligence process before engaging with the third party.

The Anti-Bribery & Corruption Manual provides detailed information concerning third-party due diligence procedures.

6. FACILITATING PAYMENTS

6.1. PMG does not allow the use of facilitating payments. Such payments may be considered a customary way of doing business in some countries. Still, it is essential to understand that



the anti-bribery laws of many countries prohibit such payments. In particular third-party intermediaries, employees and third parties are prohibited from making facilitating payments on PMG's behalf.

6.2. Under exceptional circumstances, i.e., when an employee's safety is at risk, a facilitating payment may be permissible.

6.3. When a payment has been made as per section 6.2, an incident report must be submitted to PMG Compliance immediately as per the Misconduct Investigation Manual and Speak Up Manual of PMG.

7. BOOKS, RECORDS, ACCOUNTING AND PAYMENT PRACTICES

7.1. To prevent the possibility of bribes and kickbacks being paid or accepted, all PMG business and financial records must fairly and accurately reflect each transaction involving PMG business or the deployment of company assets.

7.2. Secret, unrecorded, or unreported transactions are prohibited.

7.3. All expenses must be accurately accounted for, include appropriate supporting documentation, and be promptly entered into company records before reimbursement.

7.4. The requirement under section 7.3 includes, but is not limited to, the accurate identification (in expense reports, related business, and financial records) of all payments to third-party intermediaries acting for or on behalf of PMG.

8. DISCIPLINE

8.1. PMG and its employees can be investigated by government regulators in different jurisdictions and, depending on the circumstances, prosecuted administratively, under civil law or under criminal law, which could result in severe fines and penalties, debarment, and imprisonment if a violation of applicable anti-bribery and corruption laws and regulations is established.

8.2. Any employee found to violate this policy will be subject to disciplinary action, up to and including termination of employment, as per applicable laws and company policies.

8.3. Distributors, suppliers, agents, consultants, and other third-parties working for PMG who violate this policy will be subject to the business relationship's termination and any other legal and remedial actions available to the PMG under applicable law.

9. REPORTING BREACHES OR CONCERNS

9.1. It is the responsibility of all employees to ensure compliance with this policy.



9.2. Any employee who witnesses a breach of this policy is obliged to contact PMG Compliance promptly.

9.3. Any employee who is in doubt, or suspects that this policy has been breached, or has concerns about past or proposed actions by anyone in PMG, or any third party working with the PMG in any capacity, is encouraged to contact the PMG Compliance, Local Compliance Representative or PMG Committee as per the Misconduct Investigation Manual and the Speak Up Manual.

ROLES AND RESPONSIBILITIES

Body/function/individuals	Roles and responsibilities
PMG Board of Directors (BoDs)	Responsible for policy approval
PMG Audit Committee	Policy owner with overall responsibility to BoDs for corruption issues as described in this policy ensures that material corruption risks are duly attended to and communicated to the BoDs. Responsible for periodically assessing the effectiveness of this policy, the related manuals and screening procedures, and reporting findings to BoDs. Responsible for supporting the implementation of the policy in the organization via communication & training.
Head of Legal	Responsible for carrying out training, monitoring and other activities as further detailed in the Anti-Bribery and Corruption Manual to ensure compliance with the policy.
Management, employees, and contract workers of all entities in PMG	Responsible for adhering to this policy.

DEVIATIONS

No exemptions from this policy can be granted unless there are exceptional circumstances. All requests for exemptions must be made in writing to the policy owner. The policy owner must assess and decide on each request individually. Exemptions must be duly logged and documented.