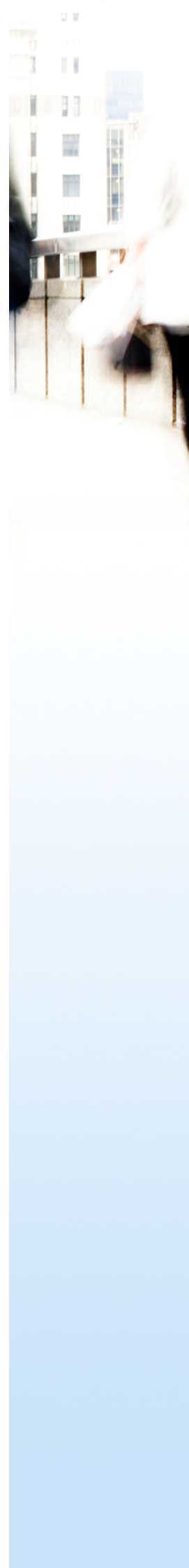




# Corporate Integrity Policy





## TYP SA GROUP CORPORATE INTEGRITY POLICY

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The purpose of the Corporate Integrity Policy is to set out the principles and standards of good practice that reinforce and further develop the fundamental guidelines of our Code of Ethics with regard to the prevention of corruption and bribery.

The Corporate Integrity Policy provides the framework for preventing and addressing corruption, recognising that, in an increasingly globalised environment, corruption poses significant risks to our business across the jurisdictions in which we operate.

Corruption and bribery, whether in the public or private sector, are harmful practices that the TYP SA Group unequivocally rejects because of their ethical, economic, and social consequences. They undermine the objectivity and transparency of procurement and decision-making processes, distort fair competition, adversely affect the quality of projects, and erode trust in institutions and organisations, ultimately undermining public confidence and the values that support a fair and transparent society.

Against this background, the TYP SA Group actively promotes a culture of integrity and compliance at every level of the organization and adopts this Policy as an integral part of its Integrity Management System.

This Policy applies to all TYP SA Group companies, as well as to all their employees, business partners and subcontractors. It shall be reviewed periodically, at least annually, and whenever necessary as a result of regulatory, organizational, or operational changes, or following the identification of new risks or opportunities for improvement.

### FIRM STANCE AGAINST CORRUPTION

The TYP SA Group conducts its business in a wide range of countries and across diverse regulatory and political environments.

The TYP SA Group is committed to conducting its business with the highest standards of integrity and in strict compliance with all applicable laws and regulations, including anti-bribery laws, internationally recognised best practices, and with due respect for the cultures and customs of the countries in which it operates.

The TYP SA Group maintains a zero-tolerance policy towards any form of corruption or any breach of its Code of Ethics or this Corporate Integrity Policy.

The TYP SA Group expressly prohibits offering, promising, giving, requesting, soliciting, or accepting bribes, whether in cash or in kind, as well as engaging in any other form of corrupt practice.

### CONDUCT TOWARDS CLIENTS

The TYP SA Group shall act with integrity and in the best interests of its clients, honouring its commitments regarding confidentiality and upholding the principles of transparency, honesty, and impartiality. Conflicts of interest shall be avoided, and any personal or corporate payment, benefit, or other advantage that could compromise the independence of our judgement or improperly influence a competitive process shall be rejected.

The TYP SA Group shall only undertake assignments that fall within its areas of expertise and for which it has the necessary technical and organisational capabilities to deliver effective, high-quality services.

The TYP SA Group is committed to ensuring that its communications, publications, and commercial materials are accurate, truthful, and consistent with the highest ethical standards.

### **CONDUCT TOWARDS THE ENGINEERING AND CONSULTING SECTOR**

The TYP SA Group shall conduct its business with integrity, honesty, and fairness, respecting the legitimate business interests of others and upholding the reputation and standing of the engineering and consulting sector.

The TYP SA Group strictly prohibits collusion, bid rigging, or any other practice that restricts or distorts free and fair competition.

### **CONDUCT TOWARDS BUSINESS PARTNERS AND SUBCONTRACTORS**

The TYP SA Group shall maintain relationships with its business partners and subcontractors based on mutual respect and the highest standards of professional practice. Due diligence measures shall be implemented to assess the integrity and reputation of business partners and subcontractors with whom the Group does business.

The TYP SA Group shall exercise particular care to ensure that its business partners and subcontractors are neither involved in, nor reasonably suspected of being involved in corrupt practices. To this end, appropriate control measures shall be implemented, including contractual clauses providing for termination where evidence of such practices comes to light.

With regard to commercial advisers, the TYP SA Group shall ensure that their activities are conducted in accordance with the principles set out in this Policy and are consistent with the Group's ethical standards. Their remuneration shall always be appropriate, reasonable, and commensurate with the services provided and consistent with market rates. Contractual arrangements with such advisers shall comply with internationally recognised ethical and professional standards.

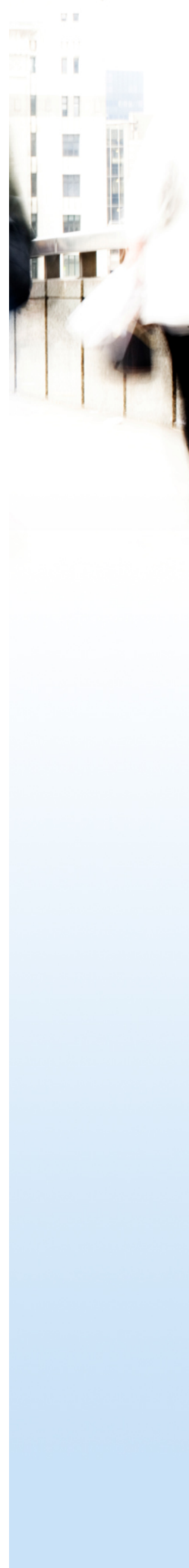
### **CONDUCT OF OUR PEOPLE**

Commitment to the ethical principles governing the TYP SA Group's business activities is a fundamental condition of employment with any company within the Group. Compliance with those principles is mandatory in the performance of all assigned duties and responsibilities.

The TYP SA Group prohibits any individual acting on its behalf from using Company facilities, information acquired through the Company, or any resources made available by the Company to engage in unlawful activities, whether intended to benefit the TYP SA Group or for personal gain.

### **CONFLICTS OF INTEREST**

A conflict of interest arises where an individual's personal, family, professional, or financial interests actually or potentially interfere, or appear to interfere, with the objective and impartial discharge of their professional duties and responsibilities.



All persons subject to this Policy shall avoid situations that give rise to conflicts of interest and shall act in the best interests of the TYP SA Group.

Where such a situation arises, the individual concerned shall promptly disclose it to the designated persons or bodies responsible for overseeing compliance with this Policy and shall refrain from participating in any related decisions or actions until the matter has been duly assessed.

### GIFTS AND HOSPITALITY

While recognising that, in certain countries and cultures, the exchange of gifts and hospitality may be a customary business courtesy or accepted social practice, employees and other persons acting on behalf of the TYP SA Group shall neither accept any payment, gift, benefit, or promise thereof intended to compromise their impartiality, nor shall they offer or provide such benefits to obtain an improper advantage for the TYP SA Group.

### KICKBACKS AND FACILITATION PAYMENTS

The TYP SA Group considers payments made to public officials or any individual with decision-making authority for the purpose of obtaining an improper advantage or facilitating or expediting official or competitive procedures to constitute a form of corruption. Accordingly, such payments are strictly prohibited under TYP SA Group's policies, except in exceptional circumstances where there is an imminent risk to the safety, physical integrity, or liberty of an individual..

### POLITICAL PARTIES

The TYP SA Group expressly prohibits making payments or donations to political parties for the purpose of obtaining any improper or undue advantage.

### CONTRIBUTIONS TO ORGANISATIONS

The TYP SA Group shall not make contributions to any organisation if there is reason to believe that such contributions may be used for unlawful or improper purposes.

### TRAINING AND COMMUNICATION

The TYP SA Group shall promote appropriate training and awareness initiatives to ensure that its employees, business partners and subcontractors understand and comply with the principles and obligations set out in this Policy and in the other documents forming part of the Integrity Management System.

### REPORTING OF BREACHES

The TYP SA Group has established internal and external reporting channels through which actual or suspected breaches, irregularities, or conduct contrary to the Code of Ethics, this Policy, or the Integrity Management System may be reported.

Through these channels, any individual may, in good faith and with full guarantees of confidentiality, anonymity (where permitted by applicable law), and protection against retaliation, report any

concern, suspicion, or information relating to actual or suspected breaches, misconduct, or other irregularities.

The TYP SA Group is committed to ensuring that all reports are handled promptly, objectively, confidentially, and in accordance with applicable laws and regulations.

The TYP SA Group is also committed to cooperating fully with any competent authority or duly constituted body legally empowered to investigate corruption where its cooperation is lawfully required.

### **DISCIPLINARY MEASURES**

Compliance with this Policy is mandatory for all persons who have an employment, contractual, or professional relationship with the TYP SA Group. Any breach of this Policy may result in the application of appropriate disciplinary or contractual measures, in accordance with the TYP SA Group's internal regulations and applicable law.

### **OVERSIGHT BODY**

The TYP SA Group companies have designated oversight bodies or individuals with the necessary independence, authority, and autonomy to be responsible for overseeing the implementation of, and compliance with, this Policy and the Integrity Management System, and for promoting their continuous improvement.

