

ANTI-BRIBERY POLICY

PCM's Top Management is committed to preventing and combating bribery and applies a zero-tolerance policy towards any related conduct.

For the purposes of this Policy, bribery means the direct or indirect offering, giving, promising, requesting, or accepting of any financial or non-financial advantage with the intention of improperly influencing a person's conduct. PCM prohibits all forms of bribery, including facilitation payments and any improper gifts, hospitality, or other benefits.

In this context, PCM applies the following principles:

- It applies a zero-tolerance policy towards bribery and corruption and is committed to acting professionally, lawfully, and with integrity in all its business dealings and relationships.
- It does not tolerate any form of bribery or corruption.
- It shall not give, offer, or offer to give, authorize, or request any person to give, directly or indirectly, benefits of any kind to individuals in order to induce them to act, by commission or omission, in breach of their duties.
- It shall never request or accept, directly or indirectly, benefits of any kind or the promise thereof in order to induce or reward improper conduct, whether by act or omission, arising from or conflicting with a person's duties.
- It permits only lawful, reasonable, and occasional gifts or hospitality that do not influence, or appear to influence, professional judgment. Any other form of gift or benefit is prohibited.
- This Policy is appropriate to the purposes and objectives of the company.
- It actively complies with all applicable laws and regulations relating to anti-bribery, anti-money laundering, and counter-terrorist financing and informs the competent authorities where required.
- It is committed to the continual improvement of the Anti-Bribery Management System.
- It informs and trains its personnel, as well as its business partners and subcontractors, regarding the Anti-Bribery Policy.
- It requires all business partners, suppliers, and third parties acting on its behalf to comply with the principles of this Policy and with the relevant anti-bribery procedures.
- It promotes a culture of integrity, transparency, ethical conduct, and open communication and requires the timely disclosure and appropriate management of actual, potential, or perceived conflicts of interest.
- It provides the framework for establishing, monitoring, and reviewing anti-bribery objectives.
- It assigns responsibility for the operation of the System to a designated role, namely the Anti-Bribery Management System Manager.
- It encourages the good-faith reporting of any actual or suspected incident of bribery, while ensuring confidentiality and protecting reporting persons from any form of retaliation or adverse treatment.
- All employees are required to act with integrity, comply with this Policy, and immediately report any actual or suspected incident of bribery.
- Any breach of this Policy may result in disciplinary action or other consequences in accordance with applicable legislation and the company's internal procedures.

This Policy is communicated to PCM personnel and relevant business partners and is made available to interested parties and the public.

Management

Last updated: September 2026