

WARNING: All printed copies of this document are **uncontrolled**. The controlled copy is available in the designated Document Management System. Users are responsible for verifying that they are consulting the current version before use.

Prepared by:		
Name and Surname	Position	
Mariano Fernández T.	HR Manager, SPI	
Preparation Date:	Start Date: 06/01/2025	End Date: 07/01/2025

Reviewed by:			Approved by:		
Name and Surname	Position		Name and Surname	Position	Signature
Miguel Di Vincenzo	General Manager, SPI		Miguel Di Vincenzo	General Manager, SPI	
Review Date:	Start Date: 07/01/2025	End Date: 07/01/2025	Approval Date:	Start Date: 07/01/2025	End Date: 07/03/2025

DOCUMENT REVISION HISTORY

Version	Date	Author	Description	Minor Change Approver	Signature
1.0			First version of document	n/a	

Versioning References
Major Changes: 1.0, 2.0, 3.0, etc.
Minor Changes: 1.1, 1.2, 1.3, etc.

Table of Contents

1. Purpose **Error! Bookmark not defined.**

2. Scope 3

 2.1. Field of Application 3

 2.2. Geographical Scope 3

3. Terms, Definitions, and Abbreviations..... 3

4. Responsibilities 3

5. Development 3

6. Related Documents 4

7. Annexes 4



1. Purpose

The Anti-Bribery and Anti-Corruption Policy aims to establish the general guidelines that convey SPI's strong and visible commitment to ensuring transparency and ethics in the conduct of business.

2. Scope

2.1. Field of Application

This Policy applies to all SPI personnel, regardless of their position, as well as to third parties acting on behalf of or representing the Company.

2.2. Geographical Scope

This Policy is global in scope.

3. Terms, Definitions, and Abbreviations

N/A

4. Responsibilities

The Board of Directors and the General Manager of SPI are responsible for ensuring the existence of the mechanisms, tools, and regulations necessary for compliance with this Policy.

Senior management, managers, and supervisors of SPI are responsible for communicating to their teams the importance of, and shared responsibility for, compliance with this Policy and its associated regulations.

5. Development

SPI is firmly committed to promoting ethical and professional conduct in the management and development of its business, and to adopting a consistent internal organization that contributes to the Company's sustainable growth over time.

In line with the Code of Conduct and our value of integrity and good practices in our decisions and behaviors, SPI sets forth the following principles:

- Prohibits any unlawful act associated with bribery or corruption, in any form, whether direct or indirect, in both the private and public sectors, anywhere in the world.

	Anti-Bribery and Anti-Corruption Policy		POLICY
Code: MSGI-01-A5	Version: 1.0	Effective Date: 08/01/2025	Page 4 of 4

- Does not tolerate its personnel, or any third party acting on its behalf or in its representation, unlawfully offering, promising, paying, authorizing, requesting, or accepting money or any other form of bribe, with the intention of corruptly influencing, inducing, securing, or rewarding any action, omission, or decision in the workplace.
- Does not allow unlawful corrupt business practices, whether for the benefit of SPI, the individual involved, or a third party.
- Complies with all applicable laws, decrees, regulations, and rules related to money laundering, anti-terrorism, and the fight against bribery and corruption that apply to SPI.
- Adopts measures to prevent bribery and corruption offenses, in line with identified risks, the size of the business, and the economic capacity of each area where the Company conducts or will conduct its business.
- Promotes the use of the internal reporting channel, ensuring independence and confidentiality for those who use it to report suspected breaches of this Policy.
- Encourages dissemination, training, and commitment at all levels of the organization to comply with this Policy and its associated regulations.
- Expects partners, suppliers, clients, contractors, consultants, and any other third party related to the Company to act consistently with the spirit of this Policy and to conduct themselves with integrity in their activities with SPI.

Any breach of this Policy and its associated regulations will be subject to internal disciplinary measures, including possible termination of employment, without prejudice to any other legal actions that may be taken before competent administrative or judicial authorities.

6. Related Documents

N/A

7. Annexes

N/A