

# Anti-corruption policy

This Anti-corruption policy establishes the principles and guidelines to ensure that all our employees, contractors, and representatives comply with anti-corruption laws and ethical business practices. System has a zero-tolerance approach towards all forms of bribery and corruption.

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## 1 Definitions

**Corruption:** The abuse of entrusted power for private gain.

**Bribery:** Offering, giving, receiving, or soliciting something of value to influence a decision or gain an improper advantage.

**Facilitation payments:** Small, unofficial payments made to expedite routine actions or services, for example, at border crossings.

## 2 Basic principles

We at System do not engage in illegal, regulatory-violating, or unethical business practices. Bribes or other unlawful financial benefits must not be offered, paid, or accepted under any circumstances, whether to authorities, customers, or other parties.

In particular, offering or accepting bribes, gifts, or services that exceed the norms of reasonable and customary hospitality is strictly prohibited.

Facilitation payments are prohibited unless there is an imminent threat to personal safety.

System will not tolerate any level of corruption. All allegations of bribery and corruption (anonymous or otherwise) will be investigated thoroughly without regard to the suspected person's position, length of service, or relationship to System.

We also expect our partners to uphold the same high standards of conduct that we follow.

Resources: [Supplier code of conduct](#)

## 3 Conflicts of interest

A conflict of interest can occur when an employee's situation or circumstance, either personal or business-related, impacts their ability to apply judgment.

We avoid conflicts of interest. We keep our personal interests separate from business decisions and do not let our personal relationships affect our work.

## 4 Reporting violations

Every employee must report any suspected or observed breach of the law, this policy, or other System policies. Primarily, we encourage contacting one's immediate supervisor, another person in management, the occupational safety organization, a representative of the employee group, or the human resources department.

If an employee feels that it is not possible to report the matter with their name, they can also report it through [System's anonymous reporting channel](#), remaining anonymous throughout the entire investigation. All reports and discussions are always treated with absolute confidentiality and thoroughness.