

ANTI-BRIBERY POLICY

AG&P (or the “Company”) is committed to preventing bribery and complying with the various anti-corruption laws that apply to its operations around the world. It is the policy of AG&P to comply with these laws and to conduct business in an ethical and professional manner, including through its directors, officers and employees, as well as its subsidiaries, joint ventures or partnerships. AG&P also expects third parties acting on the Company’s behalf to comply with the anti-corruption laws and this policy.

PROHIBITED CONDUCT

- AG&P prohibits bribes or kickbacks, including offering, requesting, giving, receiving, promising to pay or authorizing the payment of money or anything of value, to or for any private person or public official, with the intention of influencing such person to secure any business advantage for the Company.
- AG&P prohibits giving or offering gifts or payments through a third party to improperly influence a private person or public official.
- AG&P prohibits facilitating payments made to public officials for the purpose of expediting the processing of governmental requirements.
- AG&P prohibits retaliation against any person who, in good faith, reports or responds to any actual or suspected violation of laws, regulations or policies.

ETHICAL CONDUCT

- Only lawful, reasonable, modest and culturally appropriate gifts, hospitality and donations may be offered or given.
- Only gifts or hospitality that will not be perceived by others as an attempt to influence a business decision or to secure an undue advantage may be accepted.
- All gifts, hospitality and donations must be properly approved, documented and monitored in accordance with Company policies and procedures.
- Sufficient risk-based due diligence and continuous monitoring must be conducted on all transactions and third parties.
- All personnel must complete the required anti-bribery training.
- Any actual or suspected violation of anti-corruption laws and Company policies must be reported.