
Anti-Bribery and Anti-Corruption Policy (ABAC)

EFFECTIVE AS OF JUNE 04, 2026

VBCA400053 | Legal & Compliance | JUNE 04, 2026

Dear Employees,

Burckhardt Compression's Anti-Bribery and Anti-Corruption Policy (ABAC) is central to our commitment to ethical behavior, reflecting our well-established corporate culture and values.

We recognize that our reputation and the trust we earn from customers, business partners, and stakeholders depend on the integrity and conduct of every one of us. We strive for fair and transparent interactions – whether with employees, customers, shareholders, suppliers, or other partners.

As with all our ethics and compliance policies, I urge you to carefully read and understand this Policy, ask your manager or our Legal & Compliance function any questions about its application, and report any suspected violations. Thank you for your dedication to living our values – partnership, passion, performance, and responsibility – in everything you do.

Thank you for your support.

Fabrice Billard
CEO

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1. Purpose

The purpose of this Anti-Bribery and Anti-Corruption Policy (the "Policy") is to establish a clear and unequivocal stance against bribery and corruption within Burckhardt Compression. We are committed to conducting our business with integrity, transparency, and accountability.

This Policy is intended to:

- **Promote Ethical Conduct:** Ensure that all employees, business partners, and stakeholders adhere to the highest standards of ethical behavior.
- **Prevent Corruption:** Implement measures to detect, prevent, and address any form of bribery and corruption.
- **Strengthen Compliance:** Ensure compliance with all applicable laws, regulations, and international standards related to anti-bribery and anti-corruption.
- **Foster a Culture of Integrity:** Encourage a corporate culture where honesty and integrity are valued and upheld.

By adhering to this Policy, we aim to protect our reputation, build trust among our employees, business partners, and stakeholders, and contribute to a fair and transparent business environment.

2. Policy

Burckhardt Compression employees and representatives must act with integrity, honesty, fair dealing, and full compliance to ensure that we honor the trust that our employees, business partners, customers, and the public place in us.

Therefore, Burckhardt Compression will not engage in any form of active (giving) or passive (receiving) bribery, including facilitation payments, and expressly prohibits its employees, representatives, and anyone who performs services for and on behalf of Burckhardt Compression, wherever they are located, from engaging in any form of bribery.

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Employees must never, directly or indirectly, offer, provide, authorize, accept, request, or promise any personal or improper financial or other advantage to obtain or retain business or any other benefit, whether involving public or private parties. This includes any such conduct carried out through intermediaries such as consultants, suppliers, agents, or other third parties acting on behalf of Burckhardt Compression.

We expect similar conduct from every business partner with whom Burckhardt Compression has a commercial relationship. Even the appearance of impropriety in giving or receiving improper payments (which can include gifts and entertainment) can jeopardize Burckhardt Compression.

3. Scope

This Policy applies to all subsidiaries, management, employees, officers and directors of Burckhardt Compression, as well as to Business Partners (as defined below) and any other persons acting for or on behalf of Burckhardt Compression.

This Policy is to be read and interpreted together with the **Code of Conduct** ([VSB VBCA400040 E01](#)), the **Gifts and Entertainment Policy**, and the **Speak Up Policy** ([Speak Up - Burckhardt Compression](#)), and company policies governing the vetting, contracting, and management of business partners or other third parties (as defined under the **Third Party Risk Management Policy** – [VSB VBCA400049 E01](#))

4. Definition

Anything of Value: Anything that might have value to the recipient, including cash or cash equivalents (e.g., gift cards), computer equipment, medical supplies, gifts, gratuities, goods, loans, discounts, cars (including loaner, discounted, and "test drive" vehicles), entertainment or tickets, meals or drinks, travel or lodging, charitable contributions, political contributions, personal favors, paying bills for others, forbearances, offers of employment, hiring someone's friend or relative, the provision of information or assistance, discounts, and financing of non-commercial loans, or anything else that is valuable to the receiver, even if it would not be valuable to anyone else.

Bribery: Offering, giving, authorizing, receiving, or soliciting Anything of Value (see definition) to influence the actions of someone in a position of power or authority, including but not limited to a private individual, a Public Official (see definition) or other person who has a public or legal duty. For the avoidance of doubt, Bribery under this Policy also includes commercial bribery, which is corruptive conduct involving employees, agents or representatives of private sector third parties, such as customers, suppliers or business partners, even where no Public Official is involved

Business Compliance Partner: A designated employee who serves as the first-line compliance contact within a division, function, or Burckhardt Compression subsidiary. If no Business Compliance Partner has been appointed to a subsidiary, the term includes any person nominated in writing by the Managing Director of that subsidiary, or, in the absence of such nomination, the Managing Director themselves.

Business Partner: Any third-party individual or entity that acts for, on behalf of, or provides services to Burckhardt Compression, such as agents, sponsors, suppliers, distributors, resellers, consultants or any other representatives.

Charitable Contributions: Charitable contributions are voluntary contributions made for legitimate charitable purposes, without the intent or expectation that such contributions improperly influence decisions or result in any improper business advantage.

Corruption: Abuse of entrusted power for private gain.

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Entertainment: Any hosted social event, including meals, receptions, parties, theatrical and sporting events given to an external party or accepted by a Burckhardt Compression employee.

Facilitation Payment: A payment of small value made to low level or clerical government employees to expedite or secure the performance of a non-discretionary, routine governmental action to which Burckhardt Compression is legally entitled (also known as "grease payments").

Gift: Any item of value given to an external party or accepted from an external party in connection with Burckhardt Compression's business, including cash, travel, living expenses, meals, discounted goods and entertainment. A social event provided by any Burckhardt Compression employee who is not attending the event is a gift. Examples include gifts of restaurant coupons and tickets to theatrical or sporting events that the recipients attend unaccompanied by any Burckhardt Compression employee.

Improper Payment: Improper payments should not be confused with reasonable and limited expenditures for business courtesies directly related to the promotion of products or services or the execution of a contract.

Public Official¹:

- Anyone working for any government department or organization controlled by any government, at any level or in any role – including employees of any government-run or government-controlled body, government agency, department, or state-owned company such as a government owned oil or energy company or state university;
- Anyone acting on behalf of such government or department, or who otherwise exercises a public function on behalf of a country or territory. For example, a private company managing a public infrastructure project under government authority;
- Any person holding a legislative, administrative or judicial position of any kind;
- Any employee or agent of a public international organization, including NGOs and development banks;
- Any political party or candidate seeking public office; and
- Any politically exposed person (so-called "PEP"), as defined under applicable anti-money laundering regulations, to the extent such person holds, exercises, or is reasonably perceived to exercise a public function.

Sponsorship: Form of marketing in which Burckhardt Compression pays for all or some of the costs associated with a project or program or conference to gain or obtain market recognition.

5. Guidelines

5.1 Interaction with Public Officials

While customary and reasonable interactions with Public Officials may be permitted, they require heightened scrutiny. Anti-corruption laws strictly prohibit giving, offering, promising, or authorizing Anything of Value, directly or indirectly, to improperly influence an official's duties or securing an unfair business advantage. This includes dealings with both Public Officials and, in some cases, private sector third parties. Violations can result in severe penalties, including fines and imprisonment, for both individuals and Burckhardt Compression. The company may also be held liable for misconduct by Business Partners.

Because bribery and corruption take many forms, including cash payments, gifts, travel and entertainment, and other acts, we must steer clear of any activity that even appears to be illegal or unethical.

¹ Note that members of a royal family may or may not be considered public officials depending on their responsibilities and the laws of the country.

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To ensure we adhere to this Policy you should do the following:

- Familiarize yourself with all relevant anti-corruption laws that apply to your business and geographic location and ensure that you conduct business in strict compliance with these laws. Where local laws impose a lower standard than those set out in this Policy, the Policy will prevail
- Never make, offer, or authorize an Improper Payment, whether to Public Officials, or private persons or legal entities, to gain an improper business advantage.
- Immediately report suspected violations of bribery laws and requests for payment by or for Public Officials.
- Be familiar with "red flags" indicating potential corrupt activity, such as Business Partners who fail to substantiate their services, submit inflated charges, or are not transparent in their dealings with or on behalf of Burckhardt Compression. The presence of these or other "red flags" should lead you to first seek guidance from line management, Legal & Compliance, a Business Compliance Partner or other appropriate company resources regarding how to proceed in the circumstances, or to report a potential violation of this Policy.

5.2 Gifts and Entertainment

Gifts and entertainment can play a role in building business relationships, but they must always be appropriate, lawful, and never intended to influence, or appear to influence, business decisions. This is especially important when dealing with Public Officials, where stricter rules often apply.

To ensure consistency and compliance, all gifts and entertainment given or received must comply with Burckhardt Compression's **Gifts and Entertainment Policy**, which provides further guidance and approval requirements.

5.3 Charitable Contributions and Sponsorships

Burckhardt Compression may support various charitable and educational causes in the countries in which it operates as a matter of good corporate citizenship. In some cases, the recipients may be individuals, as with scholarships or training grants. In other cases, contributions may be made to charitable organizations that are supported or sponsored by Public Officials

All Charitable Contributions and Sponsorships must be transparent and follow Burckhardt Compression's Delegation of Authority. You must carefully select reputable charitable organizations. Ensure that all funds are used for their intended purpose and make sure they do not improperly benefit a Public Official or act as a cover for bribery.

5.4 Hiring

Hiring decisions must be based on merit and not on any form of bribery or corruption. Offering employment or internships to influence business decisions or gain favor with customers, suppliers, or Public Officials is strictly prohibited. Special care must be taken when hiring Public Officials or their relatives to avoid any conflict of interest. All recruitment processes must be documented and auditable. Hiring managers must maintain records of interviews, evaluations, and selection criteria.

5.5 Facilitation Payments

- **Purpose:** The primary purpose is to expedite administrative processes, such as processing permits, issuing licenses, or other routine governmental actions.
- **Legality:** The legality of such payments varies by country. In some countries, they are considered normal and legal, while in others, they are prohibited and classified as bribes.

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- **Amount:** Typically, these payments are small and unofficial. However, the value of the payment can raise red flags for law enforcement, especially if it is substantial.

Even if legal, facilitation payments are often viewed as ethically questionable because they can perpetuate corrupt practices and create unfair competition.

At Burckhardt Compression facilitation payments are prohibited.

5.6 **Political Contributions and Lobbying**

Political donations and lobbying can carry significant bribery and corruption risks. They may be seen as attempts to gain favorable treatment or conceal improper payments, especially when made through Business Partners. Such activities are often heavily regulated or prohibited, and even lawful actions can harm the company's reputation if perceived as unethical. All political contributions must comply with applicable laws, must not be used to gain business or an unfair advantage, and require prior involvement of a Business Compliance Partner and approval from the Chief Compliance Officer. Approved activities must be properly documented and reported by the Business Compliance Partner.

5.7 **Business Partners**

Burckhardt Compression recognizes that working with Business Partners (and other third parties acting on its behalf) can involve bribery and corruption risks, especially when they act on our behalf or interact with public officials. To mitigate these risks, all third parties must comply with this Policy, as well as with our **Third Party Risk Management Policy** ([VSB_VBCA400049_E01](#)) and the **Global Policy for Engaging Sales Partners** ([VSB_VBCA400035_E01](#)). Appropriate due diligence must be conducted before engagement, and ongoing oversight is essential.

5.8 **Records and Internal Controls**

Burckhardt Compression is committed to maintaining accurate books and records that fairly reflect all transactions. Employees must ensure that any payments, gifts, or transfers of value – especially those involving Public Officials – are properly documented.

Robust internal controls are essential to prevent and detect bribery and corruption. These include appropriate segregation of duties, approval processes, and regular monitoring. Management is expected to tailor controls to their business risks, actively consult with the Business Compliance Partner and the Chief Compliance Officer, and ensure compliance with applicable policies and legal requirements.

5.9 **Duress Payments**

Payments made in order to prevent an imminent threat to health, safety, or life are not prohibited by this Policy. This exception is a narrow one, applies only when the threat is to people rather than property, and does not guarantee that such a payment is permitted by law. Advance approval from the Chief Compliance Officer should be obtained where practicable, and if not then the Chief Compliance Officer should be notified promptly of the payment made and the circumstances. Such payments also must be recorded accurately.

6. **Roles and Responsibilities**

Business Compliance Partner: Assists in implementing this Policy within their respective areas by acting as accessible first-line compliance contacts. They help identify potential integrity risks early, support basic fact-gathering and third-party checks, and escalate concerns or missing information to the Chief Compliance Officer.

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Chief Compliance Officer: Responsible for overseeing the communication and implementation of this Policy, providing training and guidance to employees, monitoring compliance, investigating reports of policy violations, and recommending corrective actions, reviewing and updating the Policy, and reviewing pre-approval requests consistent with the Policy.

Employees and all those to whom this Policy applies (see Section 3 above): Must understand and comply with this Policy, complete required training, and report any suspected violations or unethical behavior, and avoid conflicts of interest and refrain from offering or accepting bribes or improper advantages.

Human Resources: Integrate this Policy into mandatory employee onboarding and training programs, with content provided and overseen by the Chief Compliance Officer, including oversight of participation and completion. In addition, Human Resources must ensure hiring practices align with this Policy and are free from favoritism or undue influence, maintain documentation of recruitment processes and decisions.

Management: Must lead by example and promote a "zero-tolerance" approach to bribery and corruption, ensure that internal controls, due diligence procedures, and compliance programs are implemented and maintained, support investigations and enforcement of disciplinary actions when violations occur and reinforce the Policy within their teams and ensure that employees understand and comply with this Policy.

7. Violations

Any suspected or actual violations of this Policy should be reported promptly through appropriate reporting channels. This may include reporting to the Chief Compliance Officer, a Business Compliance Partner, line management, Human Resources, or the Legal & Compliance function.

Employees and all those to whom this Policy applies (see Section 3 above) are encouraged to raise concerns, ask questions, or seek clarification on compliance matters without fear of retaliation.

Concerns may be raised through normal reporting lines or, where preferred or appropriate, through Burckhardt Compression's Global Speak Up channel, which is operated by an independent third-party service provider and allows for confidential and, where legally permitted, anonymous reporting. The Speak Up channel is available to report suspected violations of the Code of Conduct, applicable laws, internal policies (including this Policy), values, and behavioral standards. Further information on the design and operation of the Speak Up reporting channel can be found in the Speak Up Policy at <https://www.burckhardtcompression.com/speak-up>.

8. Enforcement and Consequences

We mandate that our employees and all those who undertake business on our behalf remain vigilant to the risks associated with bribery and corruption, and that they exercise sound judgment to avoid any actual or perceived conflicts of interest.

Employees are expected to comply with this Policy; failure to do so may result in disciplinary action, up to and including termination of employment.

Non-compliance with this Policy may lead to legal consequences for both employees and Burckhardt Compression

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9. Policy Review

This Policy will be reviewed periodically to ensure its effectiveness and relevance to changing regulatory requirements

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