

Humble Group Anti-Bribery & Corruption Prevention Policy

Integrity in our DNA

Conducting business with integrity is a core value of Humble Group.

As a signatory of the [United Nations Global Compact](#) we are committed to combatting all forms of corruption and recognize that as a socially responsible company with global stakeholders, we must accept full liability for the actions within our direct operations.

We recognize that a breach of this policy or any local anti-bribery and anti-corruption laws may result in legal and financial consequences for Humble Group and/or the individuals involved. There is a reputational risk if behaviors even appear to be illegal, despite intentions.

We believe that open communication is beneficial and therefore choose to publish our zero-tolerance approach towards all forms of bribery and corruption publicly in the spirit of transparency.

The Fight Against Bribery & Corruption

Bribery & corruption are international issues which must be tackled globally through collective action. These behaviors distort fair competition and impair economic development.

Humble Group takes responsibility for any dishonest or illegal behavior that occurs in the conduct of the Group's business. However, we recognize that the fight against bribery & corruption remains primarily a governmental responsibility and this policy should support governmental efforts, rather than replace governmental efforts.

Scope

This policy applies to all Humble Group employees globally, across all business divisions and operations.

We take all reasonable measures to ensure that joint ventures we take part in comply with our Anti-Bribery & Corruption Prevention Policy.

We conduct detailed due diligence with regards to corruption risks before proceeding with any merger, acquisition, or joint venture.

We communicate our commitment to fighting bribery & corruption to our business partners and favor those business partners who share and uphold this policy. We required all brokers, agencies

and operators who represent us, particularly in countries with known increased risk of corruption, to comply with this Humble Group's Anti-Bribery & Corruption Prevention Policy.

The Policy's Guiding Principles

Under this policy, Humble Group takes a zero-tolerance approach to the following:

- "Facilitation payments" – the payment of small financial sums to any public authority to accelerate legitimate processes
- "Improper advantages" – the giving/receiving of preferential terms such as rebates, kickbacks or any other advantage which is seen to influence the performance of duties or obtain a business advantage
- Contributions to any kind of political party or politician
- Contributions to any scholarship, grant, charity, or philanthropic partner that is not documented and approved by the business' management team and/or enabling an improper advantage for Humble Group
- Gifts or entertainment (either given or received) deemed unreasonable under the circumstances that might influence or be seen to influence any business relationship. Gifts should be only given/received on customary business or cultural occasions and should never involve cash or cash equivalents (e.g., checks)
- Hospitality, entertainment, or meals that are not in connection with a company event or business meeting. These expenses or gestures must be reasonable and never provided on a stand-alone basis.

The Role of Our Employees

Humble Group's Anti-Bribery & Corruption Prevention Policy applies to all Humble Group Head Office employees and all subsidiaries' employees, and compliance is therefore mandatory for all employees globally.

Humble Group employees are expected to:

- Never accept, tolerate, or participate in any form of corrupt business behavior
- Never give, promise, solicit or accept any form of bribe or improper advantage
- Always ensure that Humble Group's zero-tolerance approach to bribery & corruption is clear and exhibited through all employee interactions
- Immediately escalate through the proper governance channels if they become aware of any suggested or actual behaviors which would be in breach of this policy
- Always record all business transactions for proper record-keeping and documentation
- Always use written electronic communications or other electronic tools (e.g., government e-portals) to reduce face-to-face interactions with public officials, thereby reducing the risk of interactions that could be misinterpreted

Governance

This policy is overseen by Humble Group's Chief Executive Officer, Chief Financial Officer, and Chief Operating Officer. The implementation and compliance of this policy is supported by the entire Humble Group Management Team including the Head of Sustainability and our team of Operating Directors.

In case of doubt, employees may seek advice by contacting their Operating Director directly.

In the event where a situation arises which is in contradiction to anything outlined in Humble Group's Anti-Bribery & Preventing Corruption Policy, employees should raise these concerns to their Operating Director. Alternatively, employees can use Humble Group's **Speak Up** Platform to report any concerns anonymously. Employees may not face any retaliation for raising concerns, filing reports and/or being included in the resolution of any reports regarding potential cases of bribery & corruption.

Humble Group's Anti-Bribery & Corruption Prevention Policy is revised occasionally and is always under supervision by the Board of Directors.