

Anti-Bribery & Corruption Prevention Policy

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1. Background and purpose

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

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.

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.

2. Audience

The policy applies to all employees within the Group, across all of our own 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 expect 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**.

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.

3. Policy statement

3.1. Our 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.

3.2. 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.

4. Roles and responsibilities

The Head of Sustainability of Humble Group AB (publ) is the owner of this policy.

The CEO and Board of Directors of Humble Group AB (publ) are ultimately responsible for compliance with this policy.

The CEO of each subsidiary within the Group is responsible for implementing the policy. This includes ensuring their teams are aware of and consistently trained on the expectations outlined in the **Anti-Bribery & Corruption Prevention Policy**.

The implementation and compliance of this policy is supported by the entire Humble Group Management Team including our team of Operating Directors. In case of doubt, employees may seek advice by contacting their Operating Director directly.

5. Exceptions

There are no exceptions to this policy.

6. Monitoring of compliance

- Humble Group AB (publ) shall conduct detailed due diligence with regards to corruption risks before proceeding with any merger, acquisition, or joint venture.
- Humble Group shall communicate our commitment to fighting bribery & corruption to our business partners and favor those business partners who share and uphold this policy.
- Humble Group shall continue its supplier due diligence work and will uphold the standards in our **Supplier Code of Conduct**, which includes upholding our commitment to fighting bribery and corruption throughout our value chain.
- In the event where a situation arises which is in contradiction to anything outlined in Humble Group's **Anti-Bribery & Corruption Prevention 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 shall 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 as per **Humble Group's Speak Up Policy**.