

ANTI-BRIBERY & CORRUPTION POLICY

Huber Parking International GmbH

Statement of intent

Huber Parking International GmbH firmly believes that a company's reputation and success can only be built on foundations of integrity and core ethical values. Conducting business with a zero-tolerance approach to all forms of corruption is central to these values. The policy below sets out the standards expected of all employees in relation to anti-bribery and corruption. All employees must adhere strictly to relevant laws in this area, including The Bribery Act 2010.

The Policy is also relevant for third parties who perform services for or on behalf of Huber. Huber expects those persons to adhere to this policy, as if they were an employee of the company, or have in place equivalent policies and procedures to combat bribery and corruption.

Huber Parking has a zero-tolerance policy towards corruption of all kinds.

Employees should note that it is a criminal offence to offer, promise, pay, request or accept a bribe. A bribe does not need to be a monetary sum. It can be any form of advantage, offered or received. A contract does not need to have been won for a corruption offence to have been committed. Similarly, a recipient does not need to benefit personally from a bribe. Bribery can occur in the private and public sector.

This policy consists of two straightforward rules which all employees must adhere strictly to:

- Do not offer, promise or pay bribes.
- Do not request, agree to, receive or accept bribes.

The risks of corruption are not always obvious. Accordingly, employees should follow these principles:

- Do not make payments to someone (or favour them in any other way) if you know that the acceptance of this will lead to that person misusing their position (or performing their functions improperly).
- Do not misuse your position (or perform your functions improperly) in connection with payments (or other favours) for yourself or others.
- If in doubt of a perceived personal benefit, ensure that you address this with our administrative manager, so the benefit can be documented or, if deemed necessary, returned.

Gifts and Hospitality

Huber Parking recognises that gifts and hospitality inevitably occur in business. The following guidelines should be adhered to when offered a gift or hospitality:

- The gift should be in good faith and genuine.
- Nothing should be expected in return for the gift by either the giver or the recipient.
- The gift should be offered openly and not in secret.
- A gift in the form of a ticket to a sporting event, theatre, or other such occasion must never be accepted if the giver is not attending the same event. If the giver is attending, prior permission by a Huber Parking UK Limited director or the business manager must be sought before accepting the event.
- A monetary gift in the form of cash, gift card or voucher must never be accepted.
- A gift below the permitted value threshold (£30) can be accepted without prior permission but must be declared in the Gifts and Hospitality Register.

- Gifts above the permitted value threshold (£30) require prior permission by a Huber Parking UK Limited director or the business manager must be sought and must still be declared in the Gifts and Hospitality Register.

Inevitably, decisions as to what is acceptable may not always be easy. If any employee is in doubt as to whether a potential act could give rise to corruption concerns, the matter should be referred immediately to our business manager or a Huber Parking International GmbH director.

Rheinbrohl, January 2024

A handwritten signature in blue ink, appearing to read 'M. Lauble'.

Markus Lauble
Managing Director

A handwritten signature in blue ink, appearing to read 'Tomer Meiom'.

Tomer Meiom
Managing Director