

Version as of January 27, 2026

URBI Gulf FZ-LLC is committed to maintaining the highest standards of transparency, ethical conduct, honesty, and integrity in all interactions with counterparties, partners, government authorities, and other participants in business relations, as well as in the Company's internal processes.

Guided by the principles of good faith and integrity as the foundation of trust between individuals, organizations, and public authorities, and striving to ensure transparency and accountability in all business activities, the Company has developed and implemented a dedicated Anti-Bribery Management System.

1. Policy Purpose

This Policy establishes the Company's zero-tolerance approach to any form of bribery, corruption, kickbacks, improper payments, abuse of position, and other unethical practices in the course of its business activities.

The purpose of this Policy is to:

- ensure transparency of business processes;
- prevent corruption risks;
- protect the Company's business reputation; and
- ensure strict compliance with the applicable laws of the United Arab Emirates and international standards of ethical business conduct.

This Policy has been developed and is applied with due consideration to the requirements and principles established by the applicable legislation of the United Arab Emirates, as well as the ISO 37001 Anti-Bribery Management Systems standard.

2. Applicability of the Policy

This document establishes mandatory requirements to be observed by all persons interacting with the Company, including employees, contractors, consultants, partners, suppliers, and any other third parties acting in the interests of or on behalf of the Company, both within and outside the Company.

The provisions of this Policy are binding upon all such persons in the course of carrying out any activities related to the Company.

This Policy applies to all persons acting on behalf of, at the instruction of, or in the interests of URBI Gulf FZ-LLC (hereinafter referred to as the "Company Representatives").

3. Company Commitments and Anti-Bribery Framework

In pursuit of the above objectives, the Company:

- I. is committed to preventing all forms of bribery and corruption, combating such practices, and ensuring that persons involved are held accountable in full accordance with applicable law;
- II. complies with all applicable laws and regulations of the United Arab Emirates relating to anti-bribery and anti-corruption, and takes into account relevant international standards and best practices of ethical business conduct;
- III. expects all counterparties, partners, suppliers, and other persons interacting with the Company or acting on its behalf to strictly adhere to this Policy and applicable legislation;
- IV. promotes and maintains a corporate culture based on integrity, good faith, and zero tolerance for corrupt practices;

V. regularly identifies and assesses bribery and corruption risks and develops and implements appropriate controls to minimize such risks and their potential impact on the Company's activities;

VI. encourages employees and relevant stakeholders to report suspected or potential cases of bribery in good faith or based on reasonable belief, with a guarantee of confidentiality and protection from retaliation;

VII. ensures that this Policy is communicated and made available in appropriate languages within the Company and provided to relevant stakeholders exposed to elevated corruption risks;

VIII. periodically reviews this Policy and the components of the Anti-Bribery Management System to ensure their continued effectiveness and compliance with legal requirements;

IX. strives for continuous improvement of the Anti-Bribery Management System through monitoring, evaluation, periodic performance review, and reassessment of bribery risks;

X. provides the necessary resources for the effective implementation and maintenance of the Anti-Bribery Management System.

4. Prohibition of Bribery and Improper Payments

All Representatives of the Company are strictly prohibited from:

- offering, promising, giving, requesting or receiving bribes in connection with the Company's business;
- offering or receiving any financial or other advantage intended to improperly influence a decision or the performance of any duty.

Bribes may take many forms but typically involve corrupt intent and an expectation of something in return.

A bribe may include any direct or indirect promise, offer, authorization, payment, kickback, reward or other advantage.

Bribery is the offering, promising, giving, demanding or accepting of any advantage as an inducement for an action that is illegal, unethical, or improper.

Corruption includes the misuse of public office or private position for personal or third-party gain.

The use of intermediaries (including agents, consultants or partners) for the purpose of making improper payments is strictly prohibited.

There are no exceptions to this prohibition. Cultural practices, local customs, unclear legal standards, instructions from management, competitive pressure, or risk of losing business shall never justify engaging in bribery or improper payment.

No person acting on behalf of the Company shall suffer adverse consequences for refusing to engage in improper conduct.

5. Specific Risk Areas and Practical Guidance

5.1 Extortion and Duress

The Company actively resists extortion and any demands for improper payments, benefits, or advantages in any form.

However, the health, safety, and liberty of individuals is always the priority. If a payment is made under duress where personal safety or freedom is at risk, such payment must be:

- I. reported immediately to management and the Legal Department;
- II. properly documented and recorded;
- III. subject to internal review and audit.

5.2 Facilitation Payments

Facilitation payments are strictly prohibited.

In exceptional cases where a payment to a government authority is lawful, unavoidable, and not intended to obtain an improper advantage (for example, official government fees), such payment must be:

- I. pre-approved by management and Legal;
- II. fully documented and properly recorded.

5.3 Gifts and Hospitality

Representatives of the Company may not offer, give, or accept gifts, hospitality, or entertainment that exceed customary and legitimate business courtesies.

Such benefits must:

- I. be reasonable, proportionate, and transparent;
- II. never be intended to obtain an improper advantage;
- III. never be in cash or cash equivalents.

If a gift or hospitality may create an appearance of impropriety or conflict of interest, it must be declined.

5.4 Sponsored Travel and Other Advantages

Any travel, accommodation, sponsorship, or other benefit provided to or received from third parties must have a legitimate business purpose, be proportionate, transparent, and properly documented.

6. Prevention of Extortion and Improper Pressure

The Company firmly and consistently resists any attempts of extortion, coercion, threats, or demands for improper payments, benefits, or advantages in any form.

No person acting on behalf of, at the instruction of, or in the interests of the Company is permitted to agree to provide any improper advantage, even in situations involving pressure, threats of adverse consequences, administrative obstacles, delays, or risk of losing commercial opportunities.

Any instance of extortion, improper demands, or pressure from third parties must be immediately documented and reported to the Company.

The Company expressly recognises that local customs, business practices, informal expectations, urgency of processes, or complexity of administrative procedures shall never serve as justification for engaging in corrupt conduct.

7. Third Parties and Business Partners

URBI Gulf FZ-LLC expects all counterparties, partners, consultants, suppliers, agents, intermediaries, and any other third parties acting on behalf of the Company or interacting with it to strictly comply with this Policy, applicable UAE anti-corruption legislation, and internationally recognised standards of ethical business conduct.

The Company operates on the principle that corruption risks arising through the actions of third parties are considered risks of the Company itself.

Accordingly, the Company reserves the right to:

- conduct integrity and background checks on third parties prior to and during cooperation;

- request confirmation of compliance with anti-corruption requirements;
- include mandatory anti-corruption clauses in contractual arrangements;
- immediately refuse to engage with or terminate relationships with any third party whose conduct violates this Policy or creates corruption risks.

8. Financial Transparency and Accuracy of Records

URBI Gulf FZ-LLC adheres to strict standards of transparency, completeness, and accuracy in maintaining financial, accounting, and business records.

All payments, expenses, compensation, gifts, hospitality, sponsorships, and any other transfer of value must be properly authorised, fully documented, justified, and accurately recorded in the Company's accounting systems.

The following are strictly prohibited:

- false, misleading, or incomplete records;
- undisclosed arrangements, oral agreements, or hidden conditions;
- use of intermediaries or third parties to conceal the nature of payments;
- creation of unrecorded funds, accounts, or mechanisms not reflected in official reporting.

The Company considers the accuracy of its records to be a fundamental element of its anti-corruption framework and of its compliance with UAE legislation and international standards.

9. Conflict of Interest

All persons interacting with the Company must avoid situations where personal interests may conflict, or appear to conflict, with the interests of the Company.

Any such situations must be disclosed promptly.

10. Reporting Concerns (Speak Up)

Any person who becomes aware of, or suspects, a violation of this Policy is encouraged to report it.

Reports may be submitted confidentially to: **info@urbi.ae**

URBI Gulf FZ-LLC guarantees that no person will suffer adverse consequences for reporting concerns in good faith.

11. Consequences of Violations

Violation of this Policy may result in termination of cooperation, contractual liability, and reporting to competent authorities where required by law.

12. Public Commitment

URBI Gulf FZ-LLC guarantees the clarity, accessibility, and implementation of this Anti-Bribery and Anti-Corruption Policy and makes it available to stakeholders, partners, suppliers, customers, and the public.