

ANTI-BRIBERY POLICY

Effective Date: 13 June 2025

Version: 2.0

I. SUMMARY

This Anti-Bribery Policy (the “Policy”) is designed to ensure compliance with applicable anti-bribery and corruption laws, including, but not limited to, the Australia Criminal Code Act, the UK Bribery Act, and the U.S. Foreign Corrupt Practices Act (“FCPA”). Such laws generally apply to all VANITY GROUP employees and operations worldwide.

II. APPLICABILITY & SCOPE

This Policy applies to all VANITY GROUP Personnel and Business Partners, as well as contractors, consultants, and temporary employees or secondees.

This Policy is not intended to substitute for the substantive legal requirements of applicable anti-bribery and corruption laws.

III. DEFINITIONS

See Appendix A.

IV. POLICY REQUIREMENTS

Bribes can take many forms and include giving or receiving money, kickbacks, business or employment opportunities, gifts, hospitality, and sponsored travel.

The rules at VANITY GROUP are simple:

- VANITY GROUP Personnel must never pay or offer to pay a bribe to anyone;
- VANITY GROUP Personnel must never request or receive a bribe;
- VANITY GROUP Personnel must never use a third party or agent on their behalf or on behalf of VANITY GROUP to pay or receive a bribe;
- VANITY GROUP Personnel must ensure that all gifts and hospitality are directly related to a legitimate business purpose, not lavish or extravagant, infrequent, aligned with local customary practices, lawful.

We committed to:

- Commit to the prevention of bribery.
- Conduct corruption risk assessment for 100% of sites by 2030.

Gifts & Hospitality

At VANITY GROUP, we promote successful working relationships and goodwill, with our Business Partners, as they are vital to our success. We recognize that business entertainment such as dining out or attending events can play an important role in



strengthening these relationships. Further, we appreciate that there are cultural practices that include gift-giving and receiving in countries where we do business.

While we respect these practices, we must be careful not to let them override our commitment to comply with the law and our policies. As a general rule, Gifts or Hospitality must never be given or received with the intent to obtain or retain business or to influence a business decision. VANITY GROUP Personnel should also avoid circumstances that would create even the appearance of improper intent.

Some Gifts or Hospitality are never acceptable, whether given or received, including:

- Cash or cash equivalents.
- Indecent or inappropriate materials or events that might damage VANITY GROUP's reputation.
- Anything given or received during a tender process, regulatory or government decision-making period, or other pricing, purchasing, or business decision.
- Anything that breaches applicable laws or regulations.

Where a Gift or Hospitality is not appropriate, it may not be given or offered, or must be rejected or immediately returned to the giver.

Accurate Books & Records

Complete and accurate books and records are legally required and essential to managing VANITY GROUP's business and maintaining the accuracy and integrity of our financial reporting and disclosures – all of which ultimately affect VANITY GROUP's credibility and reputation.

"Books and records" do not refer to just financial accounts, but to all records prepared, generated, or maintained in the course of VANITY GROUP's business, including invoices, purchase orders, agreements, travel and expense reports, safety, and environmental reports, and regulatory filings.

Given the extensive list of records, the responsibility for ensuring their accuracy and completeness rests with each of us, not just VANITY GROUP's accounting and financial personnel. When you contribute to the creation of business records, for example, by submitting an expense report, a timesheet, or a purchase order, you are responsible for the honesty and accuracy of the information you submit.

The rule is clear: all records and reporting must be complete, fair, accurate, timely, and not misleading. No exceptions.

Engaging Third Parties

VANITY GROUP requires all Business Partners, including third parties or intermediaries, to comply with this Policy and other VANITY GROUP policies and procedures, including the Vendor Code of Conduct.

VANITY GROUP prohibits any employee and anyone acting on behalf of VANITY GROUP from retaining a third party knowing that such person will engage in corrupt behavior on behalf of VANITY GROUP. The term “knowing” includes information you knew or should have known, or that you disregarded or ignored.

If you believe that a third party may be improperly influencing, bribing, or engaging in any corrupt behavior on behalf of VANITY GROUP, you must report the issue immediately to VANITY GROUP's COO/Group CFO or Compliance team.

Before engaging a High-Risk Third Party, a thorough inquiry must be made into the third party's background, qualifications, and reputation.

Charitable Contributions

VANITY GROUP is committed to giving back to the communities where we operate and regularly makes Charitable Contributions as part of this commitment.

However, charitable donations, whether in the form of a cash donation, corporate sponsorship, or any other in-kind benefit, must never be made to any political organization, politician, or any organization affiliated or linked to a politician to avoid the risk or appearance of bribery and corruption.

V. WHERE TO GO FOR HELP

If you have questions about this Policy, how to comply, or believe that someone may have violated this policy, please contact VANITY GROUP's COO/Group CFO or Compliance team at compliance@vanitygroup.com.

You may also report a concern or violation at compliance@vanitygroup.com.

VANITY GROUP strictly forbids reprisal, retaliation, or subsequent discrimination against any person who in good faith raises a concern or reports possible misconduct.

VANITY GROUP will investigate alleged misconduct in relation to this Policy in accordance with internal procedures on investigations. Any VANITY GROUP Personnel who violate this Policy may be subject to disciplinary measures, up to and including termination of employment.



VI. RIGHT TO MODIFY POLICY

The Company reserves the right to amend, modify or discontinue this Policy at any time, for any reason.

Signature:

Date: 13 June 2025



Jie Ma
Managing Director
VANITY GROUP

Appendix A

DEFINITIONS

Anything of Value: Any tangible or intangible thing that has value (regardless of amount) to the recipient and may include, but is not limited to: money, transfers of stocks, bonds or any other property, payment of expenses, provision of services of any type, Gifts, Hospitality, travel, employment, job offers, internships, the forgiveness of debt, donations to designated charities, any other transfer of goods, services, or tangible or intangible benefits to the recipient.

Business Partner: Any agent, distributor, joint venture and equity investment partner, customs broker, consultant, or any other third party that is authorized to act for, or on behalf of, VANITY GROUP.

Bribe: Giving, promising, authorizing, or accepting Anything of Value for the purpose of improperly influencing the recipient to act, fail to act, or to otherwise influence the recipient's behavior or viewpoint.

Charitable Contributions: A contribution and/or donation of any kind to a recognized and legal charity by VANITY GROUP aligned with VANITY GROUP priorities.

Code: VANITY GROUP's Code of Conduct

Conflict of Interest: A "conflict of interest" occurs when a personal interest of VANITY GROUP Personnel (or the personal interest of a Family Member of VANITY GROUP Personnel) conflicts with an interest of VANITY GROUP. Conflicts of Interest can be actual (the conflict exists), potential (a situation exists or might exist in the near future in which a Conflict of Interest might arise, or perceived (there is no actual conflict, but a reasonable person might believe one exists).

Family Member: A parent, spouse, romantic partner, sibling, child, stepparent, or in-law. In addition to these individuals, any other person living in the same household will be considered as a Family Member under this Policy.

High Risk Third Party: Any broker, agent, distributor, potential joint venture partner, project management companies, building contractors, and contractors for major equipment supply projects or any consultant, supplier, or other third party who has been authorized, instructed, or contracted to act for or on behalf of VANITY GROUP and who will interact with Government Officials or with Government Entities.

