



## Anti-Bribery and Corruption Policy

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Last Review Date: June 26, 2025  
Owner: Mick Hoogwoud  
Approved by: Eric Rubenstein  
Department/Scope: Global  
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### Introduction

At XR, we are committed to conducting our business with integrity, transparency, and accountability. This Anti-Bribery and Corruption Policy (the “Policy”) sets out our principles and expectations for ethical conduct, and serves as a practical guide to help our people and partners identify, prevent, and respond to bribery and corruption risks in all areas of our operations and business relationships.

### Scope

This Policy applies to all XR employees, officers, directors, contractors, consultants, and third-party representatives, regardless of location. We expect our suppliers and other business partners to adhere to the principles outlined in this Policy.

### Anti-bribery and Corruption Commitment

XR complies with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010. These laws prohibit offering, promising, or giving anything of value to foreign public officials or others to gain an improper business advantage.

XR maintains a zero-tolerance approach to all forms of bribery and corruption. You must never offer, accept, or authorize bribes, kickbacks, facilitation payments, or any other improper payments—directly or indirectly. This applies to all business dealings, including those conducted through third parties. Any suspected or actual breach must be reported immediately to the Legal Department.

### Dealing with Government Officials

XR strictly prohibits offering, promising, or authorizing any form of bribe or improper payment to public or quasi-public officials (e.g., government employees, political party representatives, or employees of state-owned enterprises). Incentive payments or gifts to such individuals are not permitted under any circumstances without prior written approval from the Legal Department.

### Gifts and Entertainment

Gifts and entertainment may be acceptable when they are:

- Reasonable and appropriate
- Intended to build goodwill or legitimate business relationships
- Not given with the expectation of a return favor
- In line with common business practices (e.g., occasional meals, branded merchandise)
- Not excessive in value or frequency
- Not in the form of cash or cash equivalents (e.g., gift cards, checks)
- Recorded in accordance with XR’s internal procedures

All gifts and entertainment involving government officials require prior written approval from the Legal Department. If you are invited to an event where travel or accommodation is covered, you



must seek prior approval from the People Team. Exceptions must be approved by both your manager and the People Team.

### **Suppliers and Business Partners**

XR may conduct due diligence on all suppliers and third-party partners to ensure alignment with this Policy. All suppliers are required to sign and comply with XR's Supplier Code of Conduct.

### **Governance, Accountability, and Reporting**

All XR personnel are responsible for understanding and complying with this Policy. Violations may result in disciplinary action, including termination of employment or business relationships. Concerns or suspected violations should be reported through one of the following channels:

- **People Team:** [peopleteam@extremereach.com](mailto:peopleteam@extremereach.com)
- **Legal Department:** [legal@extremereach.com](mailto:legal@extremereach.com)
- **YourVoice:** [LINK](#) (anonymous reporting available)
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In accordance with the EU Whistleblower Directive (2019), individuals who report suspected breaches in good faith are protected from retaliation. Reports may be made internally or to a competent external authority.

### **Review and Updates**

This Policy is reviewed periodically and subject to change. For questions or further information, please contact the Legal Department at [legal@extremereach.com](mailto:legal@extremereach.com).