



Anti-bribery and Corruption Policy

Adopted by LIAN Group's
governing body.

Public Version – Condensed Corporate Overview

LIAN Group is in business to help build long-term, sustainable value, and to support solutions to relevant challenges within its sectors of activity.

Anti-bribery and corruption policy

Purpose

This Anti-Bribery and Corruption Policy sets out the Company's approach to preventing bribery and corruption in connection with its business activities. It supplements the Company's Code of Conduct and applies to employees and, where relevant, to third parties acting on the Company's behalf.

Zero-tolerance statement

The Company prohibits bribery and corruption in any form, whether involving public officials or private parties, and whether committed directly or through a third party acting on the Company's behalf. This applies across all jurisdictions in which the Company or its portfolio companies operate.

Prohibited conduct

No addressee may, directly or indirectly:

- offer, promise, or give any bribe, kickback, or improper advantage to any person, including a public official, in order to obtain or retain business or any other improper advantage;
- solicit or accept any bribe, kickback, or improper advantage in connection with the Company's business; or
- make or authorise any facilitation payment, regardless of amount or local custom.

Gifts, hospitality, and benefits

Gifts, hospitality, and other benefits may only be offered or accepted where they are lawful, reasonable and proportionate, given openly and transparently, not intended or perceived as an inducement to obtain an improper advantage, and, where required by the Company's internal procedures, approved in advance by the relevant designated function. Gifts, hospitality, or benefits involving public officials require particular caution and, where applicable, enhanced approval.

Third parties and business partners

Where the Company engages agents, intermediaries, consultants, or other third parties to act on its behalf, it seeks to conduct appropriate due diligence proportionate to the nature and risk of the engagement, and to ensure that relevant contractual arrangements reflect the Company's commitment to anti-bribery and anti-corruption standards.

Facilitation payments to public officials

The Company does not permit facilitation payments – small payments made to expedite or secure the performance of a routine governmental action – under any circumstances, regardless of local practice, except where the immediate health or safety of an individual is at risk, in which case the payment must be reported to the compliance function as soon as reasonably practicable.

Political contributions

The Company does not make contributions to political parties, candidates, or campaigns.

Record-keeping

All payments, gifts, hospitality, and benefits relevant to this Policy must be accurately and completely recorded in the Company's books and records, in accordance with applicable law and the Company's internal procedures.

Reporting

Any addressee who becomes aware of, or suspects, a breach of this Policy must report it in accordance with the Company's Whistleblower Policy. The non-retaliation protections set out in that Policy apply equally to reports made under this Policy.

Consequences of breach

Breach of this Policy may result in disciplinary action, up to and including termination of employment or engagement, and, where applicable, referral to the relevant authorities.

Review

This Policy may be reviewed and updated by the Company from time to time, including as its internal governance and compliance arrangements are further developed.

