HOUSE OF HR
HUMAN RESOURCEFULNESS

Anti-corruption and bribery policy

A. Principles

At House of HR ('HOHR'), we believe in doing business ethically, honestly, and in full compliance with all laws and regulations. HOHR is committed to acting professionally, fairly and with integrity in all its dealings, proposals to clients, candidates and suppliers wherever it operates.

Therefore, HOHR takes a clear stand: a zero-tolerance approach to bribery and corruption.

This position is not only determined by the fact that corruption or bribery are crimes which are heavily punished in the countries HOHR is active in. Corruption is a practice that cannot be associated with a respectable business, if only to avoid the damage, which may be caused by being associated with corrupt practices. Corruption also harms both the economy and society as a whole: corruption disrupts free and fair competition and promotes individual interest to the detriment of the general interest.

The Group is also committed to implementing and enforcing effective systems to counter corruption and bribery. The policy will be applicable to all employees within HOHR, clients, suppliers, and consultants and in general third parties having any type of commercial or business relation with HOHR. In all branches, the policy will be at the disposal of any interested party.

Our anti-corruption efforts are integral to the Governance pillar of our ESG strategy, contributing to ethical behaviour, legal compliance, risk mitigation, long-term sustainability, stakeholder relations and operational efficiency. In this context, HOHR adheres to the principles of the World Employment Confederation (WEC) to ensure fair and ethical employment practices. Furthermore, HOHR is a committed participant of the United Nations Global Compact and aligns its policies and practices with its Ten Principles, including Principle 10 on anti-corruption. By integrating anti-corruption measures into our broader commitment to ethical employment, we aim to promote fair and responsible business practices that contribute to a trustworthy and sustainable labour market.

B. Scope

This policy applies to all individuals working at all levels and grades, including management, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to HOHR.

It applies to all legal entities that are part of HOHR, meaning all Powerhouses and Boutiques. Newly acquired or created legal entities are also expected to apply this policy after joining the Group.

C. Policy

C.1. Definitions

- What is a bribe?

A bribe is a financial or other advantage offered or given,

- To anyone to persuade them to or reward them for performing their duties improperly or;

- To any public official with the intention of influencing the official in the performance of his duties.
- To anyone within HOHR, from a client, candidate, worker or supplier, with the intention to receive a better treatment in a potential business or deal between both parties.

➢ What is corruption?

Corruption is an abuse of power that involves acting dishonestly or improperly in return for money, personal gain, or anything of value. It can take many forms and is not limited to interactions with the government.

By wrongly benefiting a few individuals who abuse their power or position, corruption undermines respect for the rule of law and creates unfair competition.

C.2. Principles and responsibilities

HOHR prohibits all forms of corruption, extortion and bribery, including but not limited to the offering, giving, receiving, or soliciting of any undue advantage, whether directly or indirectly, in any business transaction. More detailed guidelines on the different aspects can be found here:

➢ Gifts, meals, entertainment and hospitality

All individuals covered by this policy may not offer gifts or payments when these are aimed at being awarded contracts or assignments. Nor should they accept such gifts or payments. Excessive business relationship gifts and inappropriate or excessive “entertainment” are out of the question.

In the relation with clients, suppliers, contractors, and third parties:

Invitations, gifts or representation may not be accepted or offered by individuals covered by this policy if it:

- can reasonably be considered as exerting inappropriate pressure on a client, supplier, contractor or third party;
- can reasonably be considered as creating a (moral) obligation on the part of a client, supplier, contractor or third party;
- is a violation of laws, professional standards or internal rules/procedures;
- is an infringement on the ethical and professional code of conduct;
- can reasonably be considered as an inappropriate enticement;
- could embarrass HOHR or could harm its reputation.

No individual or anyone in his/her immediate family may use his/her position in HOHR to solicit funds, invitations, gifts or free services from clients, suppliers, contractors or third parties to his own advantage or to the advantage of third parties.

Offering or receiving certain invitations and gifts is allowed insofar as this exclusively involves:

- small, appropriate and usual gifts (for example a pen, calendar, agenda, bottle of champagne) of a limited value;
- invitations for business lunches, business dinners, business seminars, professional conferences or other business events if the associated costs are reasonable and are aimed at legitimate business purposes;
- invitations to social, cultural, sports or other events, if the associated costs are reasonable and our presence serves a legitimate purpose (for example, networking) or if the events support socially responsible projects.

Moreover, each individual has the responsibility to be aware of and respect the guidelines about acceptable forms of invitations, gifts or donations applicable to the management and staff of his/her

client or supplier. We will also not provide gifts, meals, entertainment or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

In the House of HR Conflict of interest framework it is defined that House of HR employees (and their closely related persons) should yearly declare any gifts, invitations, in-kind support or services, reimbursements, loans, or other hospitality benefits from any corporation, company, association, institution, or other business in excess of €250.

In relation with governments and political bodies:

Governments have extremely strict rules with regard to invitations, gifts, and other benefits. If you should consider giving a business gift to public officials or political representatives or sending them an invitation, it would be wise to first check which rules and regulations are in place at the government agency or the political body in question (parliament, provincial council, local authorities, etc.).

- Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

Facilitation payments are typically small, unofficial payments – mostly for actions not subject to payment – made to secure or expedite a routine government action by a government official.

Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

- Providing free services or services at a strongly reduced price

In some circumstances providing free services or services at a strongly reduced price can be seen as a form of corruption. This may be the case, for example, if one expects in exchange for free services or services at a reduced price that the receiving party will exert his/her influence to award a contract to HOHR. Therefore, the necessary caution should always be used.

- Cash transactions

No cash transactions are made within HOHR. Also, we do not accept to receive cash transaction of any kind.

- Donations

We do not make contributions of any kind to political parties and unions.

No contributions to not-for-profit organisations or charitable donations will be made for the purpose of gaining any commercial advantage unless they are justified by our ESG strategy.

- Integrity of Clients and suppliers

At HOHR, our commitment to ethical conduct extends beyond our internal operations to encompass every facet of our business, including our relationships with clients. We recognize that maintaining the highest standards of integrity is not only a responsibility we hold for ourselves but also an expectation we have of our valued clients and suppliers.

We maintain a zero-tolerance policy for corruption and bribery, and we expect our clients and suppliers to adhere to the same high standards. Engaging in corrupt practices not only goes against our values but also jeopardizes the trust and reputation we have worked hard to build.

Prior to entering a business relationship, we conduct due diligence on our clients and suppliers to ensure alignment with our values and ethical standards. We require our suppliers to complete an Environment Social Governance (ESG) questionnaire in the tendering phase. The output of this questionnaire is taken into account when selecting the preferred partner.

C.3. Monitoring and reporting

- Suspicious activity reporting & handling

Suspicious activities are submitted and reported to the immediate supervisor, Finance department and/or to the Compliance department of the Powerhouse or HOHR. The choice of the alert recipient is made by the person that raises the alert.

Periodic training will ensure that staff are reminded of their duty to timely report any suspicious activity where allowed under local regulations.

Reports of atypical transactions or suspicious activity are analysed and depending on the result of this examination it is decided whether it is necessary or not to send a report to the appropriate regulatory authorities, in accordance with the legal obligations.

At HOHR, we prioritize transparency, integrity, and the highest ethical standards. House of HR has a responsibility to care for and protect the environment in which we operate. We are fully committed to improving ethical performance across all of our business activities, and will encourage our business partners and members of the wider community to join us in this effort.

- Record Keeping

By maintaining a thorough and well-organized record-keeping system, we ensure that our commitment to fight against corruption and bribery is not only communicated but also substantiated throughout HOHR with tangible evidence, facilitating internal and external audits, and reinforcing a culture of integrity within our organization.

We will keep (financial) records and have appropriate internal controls in place, which will evidence any business transaction. All accounts, invoices, other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness.

- Monitoring

We recognize that effective internal controls are essential for preventing and detecting any potential instances of corruption and bribery within our organization. These controls are part of the governance and enterprise risk management framework (GERMP). House of HR has set-up a yearly risk assessment campaign and a conflict of interest campaign.

Moreover, HOHR places a strong emphasis on the role of internal audit in ensuring the effectiveness and adherence to our Group anti-corruption and bribery policy. Our internal audit function plays a vital role in independently evaluating the design and implementation of anti-corruption and bribery controls, assessing compliance with policies, and identifying areas for improvement. Internal audits are conducted regularly to scrutinize financial processes, with a specific focus on detecting and preventing corruption and bribery risks.

The Audit & Risk Committee, on behalf of the Board of Directors, and the Compliance Department will regularly review the effectiveness of this policy.

D. Compliance

D.1. Roles and Responsibilities

All HOHR employees and associates are responsible for adhering to the principles and values set out in this policy. Everybody must familiarize themselves with this policy and participate in foreseen training/info sessions. Appropriate resources should be dedicated to the training and building of awareness to develop the knowledge and understanding of the anti-corruption and bribery policy by HOHR.

The leadership of HOHR maintains a top down commitment to tackle corruption and bribery. The

management is abiding the above mentioned policies, principles and responsibilities and sets the tone at the top by disapproving any form of bribery and corruption and implementing appropriate actions regarding fraud.

We have a zero-tolerance policy regarding engaging in activities related to corruption and bribery. Failure to do so may result in disciplinary action up to termination of employment or termination of your business relationship with HOHR and HOHR seeking damages for a breach of the anti-corruption and bribery policy.

The ultimate responsibility for the policy, dissemination and update of the policy rests with the Compliance department. This anti-corruption and bribery policy will be reviewed annually and revised as needed.

D.2. Policy compliance

This policy provides guidelines for handling situations involving corruption and bribery. Its purpose is to ensure all HOHR employees and all independent third parties who work on HOHR behalf globally (such as consultants, agents, suppliers, and others who do business with HOHR) understand and comply with applicable laws and HOHR policy against corruption and bribery.

Compliance with this policy, local legislation and international anti-corruption and anti-bribery laws is mandatory.

- Legal framework

This policy must be compliant with international laws and standards and local legislation on anti-bribery and anti-corruption and will be revised in case that any of them or both are changed. Among others, the following legislation and conventions apply to HOHR:

- OECD Anti-Bribery Convention
- The United Nations Convention against Corruption (UNCAC)
- The Council of Europe's Criminal Law Convention on Corruption
- Country specific Penal Codes & Corporate Governance Codes

D. 3. Raising your questions and concerns

House of HR strives to create and maintain a healthy, ethical and safe work environment. Therefore, everyone can and should raise awareness if a violation of this policy is going on so that appropriate action can be taken. All reports will be treated confidentially and empathetically. Anyone who has questions or doubts about whether a situation violates the policy should speak up.

All breaches, questions, concerns and doubts can be raised via multiple channels:

1. The internet application “Spot”: Spot allows you to raise sensitive issues in an accessible and, if desired, anonymous way. The customized workflow within Spot guides issue raisers throughout the process. Any issue will be addressed and followed up according to existing escalation procedures. Open the tool via talktospot.com/hohr of via the QR code.



2. You can contact your direct line manager or superior, the next level manager, the HR manager, your local compliance team or the person(s) of trust within your PowerHouse or Boutique.

3. If you believe the above channels to be insufficient or inappropriate, you can contact Thomas Decruy, the Group Risk and Sustainability Officer (contact below).

House of HR ensures that persons covered by the scope of this policy will not be victimized or penalized for reporting alleged unreasonable behaviour. Any person who is found to have victimized a person will be subject to the consequences of breaching this policy.

E. Contacts for additional guidance

In case of doubt or questions, please contact the Chief Sustainability and Risk Officer to review the matter.

Thomas Decruy

Chief Risk and Sustainability Officer

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F. Versions

This policy is updated regularly to ensure its relevance over time. Below is the list of updates made to the policy.

Version	Date	Update
1.1.	May 2022	Initial policy
1.2.	February 05, 2026	• 'Approval' section added • Principles section updated • Scope updated • Update of "Monitoring and reporting" section • CRSO contact updated

G. Approval

This policy has been approved by the Audit & Risk Committee, on behalf of the Board of directors.