



Anti-Bribery and Anti-Corruption (ABAC) Policy

By Jawa Corporate Real Estate Solutions B.V.

Effective Date: November 10th, 2024

Review Date: November 10th, 2024

1. Purpose

Jawa Corporate Real Estate Solutions B.V. is committed to conducting business in a manner that is ethical, transparent, and compliant with all applicable anti-bribery and anti-corruption laws. This Anti-Bribery and Anti-Corruption (ABAC) Policy is designed to prevent bribery and corruption in all of our operations and to ensure that all employees and business partners understand their responsibilities in maintaining the highest standards of integrity.

2. Zero-Tolerance for Bribery and Corruption

Jawa has zero-tolerance approach toward bribery and corruption in any form, whether direct or indirect. This includes:

- Offering, giving, or receiving bribes or kickbacks in exchange for favorable treatment.
- Making or accepting payments or gifts that influence business decisions or provide personal benefits.
- Engaging in activities that could be seen as conflicts of interest or which may affect impartiality.

3. Compliance with Laws

We will comply with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), and the anti-corruption regulations in the jurisdictions where we operate. Employees and agents must also comply with these laws, regardless of local customs or practices.

4. Gifts and Entertainment

- No Bribery: The offering, receipt, or solicitation of bribes, kickbacks, or other improper payments is prohibited. Employees must not offer or accept anything of value that may influence decision-making or create a conflict of interest.
- Permitted Gifts and Entertainment: Reasonable, modest gifts or entertainment that are offered or accepted in good faith and are in line with local customs may be allowed, but they must not be intended to induce or reward improper behavior.

5. Third-Party Relationships

We require all third parties, including contractors, suppliers, consultants, and agents, to adhere to our anti-bribery and anti-corruption policies. Prior to engaging third parties, we will conduct appropriate due diligence to ensure they operate in compliance with relevant laws and our values.

6. Reporting and Enforcement

Employees are encouraged to report any concerns or violations of this policy. Reports may be made through internal channels or through the company's whistleblower mechanisms. Retaliation against employees who report concerns in good faith is strictly prohibited.

Conclusion

At Jawa Corporate Real Estate Solutions B.V., we are committed to maintaining a culture of ethics, integrity, and transparency. This policy provides clear guidelines to ensure that we maintain the highest standards of professional conduct in our business relationships and daily operations.



Jeroen Lubbers
Managing Director
Jawa Corporate Real Estate Solutions B.V.

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