

ANTI-BRIBERY POLICY

SUMMARY: At VAN AMERSFOORT RACING INTERNATIONAL BV (the “**Team**”) we are aware and committed in our continue growth and evolution. Therefore, we are conscientious and committed to conduct business according with the highest ethical standards; we firmly believe that our growth, evolution and success do not frame with any form of bribery and corruption. Our Anti-Bribery Policy (the “**Policy**”) prohibits indistinctly bribery of government officials (regardless of jurisdiction) as well as private sector bribery. The practices forbidden by the Team includes offering, promising, authorizing or providing anything of value in exchange for concessions, favors, omissions or any other act that is not the result of consequences or acts under fair market conditions.

A violation of this Policy will have consequences that may involve the termination of employment of the participating collaborator or collaborators. Therefore, the Policy must be understood and adopted during the ordinary course of the activities.

If questions or concerns arise about the Policy or an action carried out by a collaborator must be reported, contact the Compliance Officer through compliance@vanamersfoortracing.nl.

This Policy reflect what is important to us. We take breaches of our policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

1. POLICY'S PURPOSE.

This Policy chases to outline Team's risks related to bribery and corruption and to provide us with tools and provide assistance to identify and avoid anti-corruption risks.

2. RISKS AND/OR CONSEQUENCES OF NON-COMPLIANCE.

A violation of Policy will be sufficient grounds for the Team to terminate the relationship with the Collaborator. Notwithstanding the aforementioned, the act committed may result in civil and criminal penalties and reputational harm to the Team.

3. SCOPE OF APPLICATION OF POLICY.

The Team expects all collaborators, either employees, officers, consultants or third parties involved with the Team, to refrain from engaging in any form of bribery or corruption, irrespective of citizenship, domicile, or location. This Policy also apply to those companies or subsidiaries controlled by the Team.

4. APPLICABLE LAWS.

Because the Team is located at the Netherlands, any act related to bribery shall be punished according the Dutch Criminal Code and related normativity. However, other sanctions must be imposed pursuant the jurisdiction where the act was performed. Additionally, any action related with bribery shall carry out internal sanctions imposed by the Team.

5. GOVERNMENT BRIBERY.

The Team and its employees have prohibited to promise, give, promising, offer, or authorize payment or any other value to any government official of any jurisdiction to obtain or retain business, to secure some advantage, or to influence a government official's actions. Any improper interaction or that has the appearance of this with government officials must be avoid.

If as an appreciation for a service provided within the framework of the law pursuant to the applicable jurisdiction, a Collaborator of the Team wishes to deliver an item of value to any government official or entity, regardless the jurisdiction, a prior written approval from the Compliance Officer must be obtained.

6. COMMERCIAL BRIBERY.

Team prohibits also employees from offer, promise or prove corrupt payments and other advantages to or accepting the same from third parties involve in private sectors persons and entities.

7. GIFTS, MEALS, TRAVEL AND ENTERTAINMENT.

It is never permissible to provide gifts, meals, travel, or entertainment to anyone (either government officials or commercial partners) in exchange for any improper favor or benefit. In addition, gifts of cash or cash equivalents, such as gift cards, are never permissible.

If as an appreciation for a service provided within the framework of the law pursuant to the applicable jurisdiction and under fair market conditions, prior written approval from the Compliance Officer must be obtained.

8. DONATIONS.

It is never permissible to provide a donation to improperly influence a government official regardless of jurisdiction, or in exchange for any improper favor or benefit. However, could be permissible to make donations directly to a government agency pursuing solely charitable effort; prior approval from the Compliance Officer is required before making such a donation.

9. PROMOTING, DEMONSTRATING, OR EXPLAINING PRODUCTS.

It is never permissible to direct promotional expenses or activities to a government official regardless of jurisdiction to obtain improperly influence, or in exchange for any improper favor or benefit. However, it may be appropriate to direct such expenses to a government official or entity in order to promote, demonstrate, or explain Team's products and services. Before doing so, prior approval from the Compliance Officer is required.

10. HIRING OR ENGAGING GOVERNMENT OFFICIALS.

It is never permissible to hire or engage a government official, or immediate family members, to improperly influence the official, or in exchange for any improper favor or benefit. Before hiring a government official (or relative thereof) prior approval from the Compliance Officer is required.

11. BUSINESS PARTNERS.

We expect from our business partners to share our ethical values. Therefore, we expect that they will never engage in bribery or corruption acts either during their ordinary course of business or on our behalf.

12. REPORTING VIOLATIONS.

If you observe conduct that may violate this Policy, contact Team's Compliance Officer, Juan Pablo Rodríguez Salamanca, through compliance@vanamersfoortracing.nl. Failure to report a violation of this Policy constitutes an independent violation of this Policy shall be considered to discipline, up to and including termination of employment.

Any report will be considered as confidential to the extent permitted by law.

The Compliance Officer will be responsible for receiving and investigating each of the submitted reports. The Compliance Officer will have the authority to obtain any evidence it deems necessary, with the broadest powers to investigate and obtain all types of evidence, and the authority to require the full cooperation of any employee, regardless of their department.

In the investigative process, the Compliance Officer must document all means of evidence obtained, allowing the complainant to cooperate in the investigation and evidentiary documentation at all times.

The Compliance Officer will assign an individual tracking number to each complaint and will keep track of and compile statistics on each of the reported cases, providing an annual report to the General Management.

Last update: June 2023