



Core values

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*These policies are contained in Burford's Global Employee Handbook.

Equal employment opportunity policy

Equal employment opportunity has been, and will continue to be, a fundamental principle at Burford Capital Limited and its subsidiaries and affiliates (collectively, “**Burford**”), where employment is based upon personal capabilities and qualifications without discrimination because of race, color, religion, age, national origin/nationality, ethnicity, creed, disability, gender, gender reassignment, sexual orientation, pregnancy, marital or civil partnership/union status, familial status, genetic information, predisposition or carrier status, military or veteran status, domestic violence victim status, arrest or conviction record to extent required by applicable law or any other characteristic protected by law.

This policy of equal employment opportunity applies to all policies and procedures relating to recruitment and hiring, compensation, benefits, termination and all other terms and conditions of employment.

If you have questions or concerns, contact Burford’s human resources department, which has overall responsibility for the equal employment opportunity policy and maintains reporting and monitoring procedures. Appropriate disciplinary action may be taken against any employee willfully violating the equal employment opportunity policy, including suspension without pay or immediate termination of employment.

Non-discrimination and anti-harassment policy

Employees have the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, Burford expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and illegal harassment.

Definitions

Sexual harassment is a form of sex discrimination and is unlawful in the jurisdictions in which Burford operates, as well as a violation of our policies. Sexual harassment may subject Burford to liability, and harassers also may be individually subject to liability. Everyone is required to work in a manner that prevents sexual harassment in the workplace. Sexual harassment includes harassment on the basis of actual or perceived sex, sexual orientation, self-identified or perceived sex, gender identity or expression and the status of being transgender. Sexual harassment can occur between any individuals, regardless of their sex, gender or sexual orientation.

For purposes of the non-discrimination and anti-harassment policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment, even if the individual is not the intended target of the sexual harassment. Sexual harassment that occurs when a person in authority tries to trade job benefits for sexual favors is also called “quid pro quo” harassment. Job benefits in this context can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment.

Sexual harassment may include a range of subtle and not so subtle behaviors. Sex-based harassment—that is, harassment not involving sexual activity or language (e.g., male manager yells only at female employees and not males)—may also constitute discrimination if it is directed at employees because of their sex.

The following is a non-exclusive list of some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- physical acts of a sexual nature, such as touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body, as well as rape, sexual battery, molestation or attempts to commit these assaults;
- unwanted sexual advances or propositions, such as requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
- subtle or obvious pressure for unwelcome sexual activities;
- sexually oriented gestures, words, signs, noises, remarks, jokes, pranks, innuendo or comments about a person's sexuality or sexual experience, which create a hostile work environment;
- sexually explicit or derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation or which interfere with the recipient's job performance;
- commentary about an individual's body, sexual prowess or sexual deficiencies;
- leering, catcalls or other insulting or obscene comments or gestures;
- sexual or discriminatory displays or publications anywhere in the workplace, such as displaying or circulating pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic (including through posting on walls, e-mail, text message, instant messenger, social media or other electronic communication);
- hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity or the status of being transgender, such as interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job, sabotaging an individual's work, intimidation, bullying, yelling or name-calling;
- sex stereotyping - *i.e.*, when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look; or
- other physical, verbal or visual conduct of a sexual nature.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under the non-discrimination and anti-harassment policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of their race, color, religion, age, national origin/nationality, ethnicity, social background, creed, disability, pregnancy, medical conditions, marital or civil partnership/union status, familial status, genetic information, predisposition or carrier status, political opinion, military or veteran status, domestic violence victim status, arrest or conviction record to the extent required by applicable law or any other characteristic protected by applicable law or that of their relatives, friends or associates, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of

unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, among others:

- epithets, slurs or negative stereotyping;
- threatening, intimidating or hostile acts or gestures;
- denigrating jokes and display or circulation in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group (including through posting on walls, e-mail, text message, instant messenger, social media or other electronic communication);
- unwanted physical conduct or "horseplay" (e.g., touching, pinching, pushing or brushing past someone or invading their personal space, grabbing, shoving, punching and more serious forms of physical assault);
- continued suggestions for social activity within or outside the workplace after it has been made clear that such suggestions are unwelcome; or
- ignoring or shunning an individual, for example, by deliberately excluding them from a conversation or a workplace social activity.

Bullying is often a form of harassment and can undermine an individual's self-confidence, competence and self-esteem. As with harassment, bullying can take the form of physical, verbal and non-verbal conduct. For more information regarding Burford's protections against bullying, refer to our Workplace Bullying Policy below.

Individuals and conduct covered

The non-discrimination and anti-harassment policy applies to all applicants, employees and interns, regardless of immigration status, and prohibits harassment, discrimination and retaliation whether engaged in by fellow employees or interns, by a manager or by someone not directly connected to Burford (e.g., an outside vendor, consultant, client, customer or visitor).

Conduct prohibited by the non-discrimination and anti-harassment policy is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and work-related social events or parties. Calls, texts, emails and social media usage by covered individuals in violation of the non-discrimination and anti-harassment policy may constitute unlawful workplace harassment, even if they occur away from Burford's premises, on personal devices or during non-work hours.

The non-discrimination and anti-harassment policy should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. Applicable law and Burford's policies prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions and privileges of employment. The prohibitions against harassment, discrimination and retaliation contained in the non-discrimination and anti-harassment policy are intended to complement and further these policies, not to form the basis of an exception to them.

Retaliation is prohibited

Burford prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of the non-discrimination and anti-harassment policy and, like harassment or discrimination itself, will be subject to disciplinary action.

Reporting an incident of harassment, discrimination or retaliation

Burford strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Any such conduct, even a single incident, can be reported under the non-discrimination and anti-harassment policy.

If you have experienced conduct that you believe is contrary to Burford's policy or have concerns about such matters, you are strongly encouraged to report such behavior to your immediate manager, any manager, Burford's human resources department or any or all of them, as applicable. Anyone who witnesses or becomes aware of potential instances of discrimination or harassment should also report such behavior to Burford's representatives identified above. You should not feel obligated to file your complaints with your immediate manager first before bringing the matter to the attention of one of the other Burford's representatives identified above.

If you would prefer to escalate your incident, complaint or grievance confidentially, we provide a reporting system operated by Lighthouse, a third-party provider of anonymous employee reporting solutions. Lighthouse is a program operated by an independent company that allows you to report any concerns you may have about the way we are conducting our business, to identify any workplace behavior that you believe violates Burford's policies or to provide questions, ideas or suggestions. Further information on Lighthouse, including the platform's contact details, can be found in the section titled *Lighthouse reporting system* in Burford's Core Values Policy.

IMPORTANT NOTICE TO ALL EMPLOYEES

If you have experienced conduct you believe is contrary to the non-discrimination and anti-harassment policy, you should take advantage of this complaint procedure. Your failure to take advantage of this complaint procedure could affect your rights in pursuing legal action under US federal law and, in some cases, other applicable law. In addition, the applicable discrimination laws in your jurisdiction may establish specific time frames for initiating a legal proceeding pursuant to those laws.

Preventing discrimination and harassment is everyone's responsibility. Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Therefore, while no fixed reporting period has been established, Burford strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken.

The availability of this complaint procedure does not preclude you from promptly advising the offender that their behavior is unwelcome and requesting that it be discontinued. However, advising the offender that their behavior is unwelcome and/or requesting that it be

discontinued shall not constitute a complaint under this complaint procedure even if the offender is one of Burford's representatives identified above.

Manager responsibilities

All managers who receive a complaint or information about suspected discrimination or harassment, observe what may be harassing behavior or for any reason suspect that harassment is occurring, are required to report such suspected discrimination or harassment to Burford's human resources department.

In addition to being subject to discipline if they engage in discriminatory or harassing conduct themselves, managers will be subject to discipline for failing to report suspected harassment or otherwise knowingly allowing such conduct to continue. Managers will also be subject to discipline for engaging in any retaliation.

Investigation

We will conduct a timely, thorough and impartial investigation that ensures appropriate due process. Confidentiality will be maintained to the extent consistent with appropriate investigation and resolution.

All employees, including managers, are required to cooperate with any internal investigation of discrimination, harassment or retaliation.

While the process may vary from case to case, an investigation may involve, as applicable and appropriate given the circumstances: (i) interviews with the parties involved (including witnesses, as relevant); (ii) review of documents relevant to the investigation that are reasonably available and accessible; (iii) documentation of the investigation and notification to the complainant and the individual(s) about whom the complaint was made of the results of the investigation; and (iv) corrective actions.

Responsive action

Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately. Responsive action may include, for example, training, referral to counselling, monitoring of the offender and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension without pay or termination, as Burford finds to be appropriate under the circumstances.

Questions

If you have questions or concerns about the non-discrimination and anti-harassment policy, you should speak with Burford's human resources department.

Workplace bullying policy

Burford strictly prohibits workplace bullying and abusive conduct. A safe and civil environment is necessary for you to achieve the highest standards we expect. Demonstration of appropriate behavior, treatment of others with respect and refusal to tolerate harassment and abusive conduct are expected of all employees.

Abusive conduct means malicious conduct by an individual that a reasonable person would find hostile, offensive and unrelated to Burford's legitimate business interests. Abusive conduct may include: (i) repeated infliction of verbal abuse, such as the use of derogatory remarks, insults and epithets; (ii) verbal or physical conduct that a reasonable person would find threatening, intimidating or humiliating; or (iii) the gratuitous sabotage or undermining of a person's work performance.

Bullying is repeated, harming mistreatment of another individual. Examples of prohibited bullying include, among others, screaming; swearing; name calling; silence and facial expressions; stealing; giving dangerous work assignments; using threatening, intimidating or cruel behaviors; deliberately humiliating a person; denying advancement; and stealing work credit.

Generally, abusive conduct or bullying:

- is committed by written, verbal, graphic or physical acts (including electronically transmitted acts—e.g., using the Internet, a cell phone, a personal digital assistant (PDA) or a wireless handheld device);
- substantially interferes with work, opportunities and benefits of one or more employees, sometimes through actual sabotaging of work; and
- adversely affects an individual's ability to function at work by placing them in reasonable fear of physical harm or by causing emotional distress.

We all share responsibility for ensuring a safe working environment for ourselves and others. If you have a complaint about bullying, or have witnessed someone else being bullied, we encourage you to report it your immediate manager or Burford's human resources department. We will promptly investigate any claims of bullying and take any necessary corrective action where appropriate. Retaliation against any person who reports an act of bullying is prohibited.

Any violation of the workplace bullying policy may result in immediate discipline, up to and including termination.

Reporting an incident of workplace bullying

The Company strongly urges the reporting of all incidents of workplace bullying, regardless of the offender's identity or position. Any such conduct, even a single incident, can be reported under the workplace bullying policy.

If you have experienced conduct that you believe is contrary to Burford's policy or have concerns about such matters, you are strongly encouraged to report such behavior to your immediate manager, any manager or Burford's human resources department. Anyone who witnesses or becomes aware of potential instances of workplace bullying should also report such behavior to Burford's representatives identified above. You should not feel obligated to file your complaints with your immediate manager first before bringing the matter to the attention of one of the other Company designated representatives identified above.

If you would prefer to escalate your incident, complaint or grievance confidentially, we provide a reporting system operated by Lighthouse, a program operated by an independent company that allows employees to report any concerns they may have about the way we are conducting our business, to identify any workplace behavior that they believe violates

Burford's policy or to submit questions, ideas or suggestions. Further information on Lighthouse including the platform's contact details can be found in the section titled *Lighthouse reporting system* in Burford's Core Values Policy.

Disability accommodation/adjustment and incapacitation policy

We are committed to complying with all applicable provisions of the disability and incapacitation laws in your jurisdiction. It is our policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual's disability under applicable law so long as the employee can perform the essential functions of the job. Consistent with this policy of non-discrimination, we will provide reasonable accommodations/adjustments to a qualified individual with a disability under applicable law who has made us aware of their disability, provided that such accommodation/adjustment does not constitute an undue hardship on Burford.

If you have a disability and believe you need a reasonable accommodation/adjustment to perform the essential functions of your job, you must contact your manager. We encourage you to come forward and request reasonable accommodation/adjustment.

On receipt of an accommodation/adjustment request, your manager will meet with you to discuss and identify the precise limitations resulting from the disability and the potential accommodation/adjustment that Burford might make to help overcome those limitations.

Burford will determine the reasonableness of the requested accommodation/adjustment and, if the requested accommodation/adjustment is reasonable, consider various factors to determine whether it would impose an undue hardship on the operation of our business, including, but not limited to, the nature and cost of the accommodation, our overall financial resources and organization and the accommodation's impact on our operations, including its impact on the ability of other employees to perform their duties and on our ability to conduct business.

The law does not require Burford to make the best possible accommodation/adjustment, to reallocate essential job functions or to provide personal use items (*i.e.*, eyeglasses, hearing aids, wheelchairs, etc.).

If you have questions regarding this policy or believe that you have been discriminated against based on a disability, you should notify Burford's human resources department. All such inquiries or complaints will be treated as confidential to the extent permissible by applicable law.

Religious observance and accommodation policy

Burford respects the religious beliefs and practices of all employees and will make, upon request, an accommodation for these observances when an accommodation request is reasonable and does not create an undue hardship on Burford's business. For example, we will provide food at Burford events that conforms to religious dietary rules where such cuisine is readily available in your locale.

If your religious beliefs or practices conflict with your job, work schedule, with our policy or practice on dress and appearance or with other aspects of employment and you seek a religious accommodation, you must submit a written request for the accommodation to your

manager. The written request should include the type of religious conflict that exists and your suggested accommodation.

You manager will meet with you to discuss the request and decision on an accommodation. If you have questions regarding this policy or believe that you have been discriminated against based on your religion, you should notify Burford's human resources department.

Pregnancy accommodation

We will provide reasonable accommodations to address the needs of an employee for their pregnancy, childbirth or related medical condition and allow them to perform the essential requisites of the job, unless the accommodation would impose an undue hardship on Burford's business.

Upon learning that you require an accommodation under this policy, we will engage in a cooperative dialogue with you to determine the type of accommodation(s) that may be appropriate and reasonable, depending on your individualized needs as well as the nature of your essential duties and responsibilities. Such accommodations may include, but are not limited to, such things as additional rest breaks, physical modifications to a work station (such as modified seating or a footrest), limits on heavy lifting, modifications in work schedule or the manner in which work is performed, reasonable time off for ante natal appointments or unpaid leave of absence.

If you would like to request a reasonable accommodation due to pregnancy, childbirth or related medical conditions, you should contact Burford's human resources department.

We will not discriminate against an employee who requests a reasonable accommodation due to pregnancy, childbirth or related medical condition and strictly prohibits any form of retaliation or harassment based on requesting or receiving such an accommodation. If you believe that you have been the victim of such discrimination, retaliation or harassment, you should promptly inform Burford's human resources department. We will promptly investigate any claims of discriminatory or retaliatory action and take any necessary corrective actions where appropriate.

Nursing employees

If you are a nursing employee, you will be provided reasonable break time as needed to express breast milk. The break time, to the extent possible, should run concurrently with any meal or other rest periods already provided to you. Such breaks shall be unpaid to the extent permitted by applicable law.

We will provide a lactation room that is separate from the bathrooms, shielded from view and free from intrusion, which you may use to express breast milk. We will also provide a refrigerator, suitable for breast milk storage, within a reasonable distance to your work area. The room will have access to electricity, including extension cords or charging stations needed to operate an electric or battery-powered breast pump, contain a place to sit, contain a surface to place a breast pump and personal items and will be safe, clean and free of hazardous material. You will also have nearby access to a sink with running water.

If you are a nursing employee, you have a right to request the use of the lactation room and may submit a written request to use the lactation room to Burford's human resources department, which will maintain a schedule for the room's use. You must submit your request

to use the lactation room prior to the requested date of use, and we will respond to the request within five (5) business days.

We will not discriminate against an employee who chooses to express milk in the workplace and strictly prohibit any form of retaliation or harassment against any employee requesting or obtaining break time for expression of breast milk. If you believe that you have been the victim of such discrimination, retaliation or harassment, you should promptly inform Burford's human resources department. We will promptly investigate any claims and take necessary corrective action where appropriate.

Open communication policy

We promote an atmosphere whereby employees can talk freely with members of the management staff. You are encouraged to openly discuss with your manager any problems so appropriate action may be taken. If your manager cannot be of assistance, Burford's human resources department is available for consultation and guidance. We are interested in all of our employees' success and happiness with us. We, therefore, welcome the opportunity to help employees whenever feasible. Nothing in this policy prohibits discussions with co-workers and third parties regarding employment-related concerns.

Safety, health & wellbeing policy statement

It is our policy to provide all personnel with a safe, healthy, and secure work environment and to comply with all applicable safety and health laws and regulations. To further these goals, you are responsible for following health, safety and security procedures at your work sites. In addition, you should notify your manager or Burford's human resources department of working conditions or work practices that you believe to be hazardous. Following such notice, we will conduct an investigation to determine if a hazard exists and, if so, will establish a method and timetable for correction. You will not be subject to retaliatory action for submitting a notice of an alleged workplace hazard or for offering a safety, health or security suggestion.

As your employer, we will aim to do the following:

Training and development

- provide training and other opportunities to develop your skills;
- complete annual employee performance reviews with 360-degree feedback;
- undertake annual engagement surveys to collect employee feedback;
- periodically provide internships in any of our principal offices; and
- encourage and assist good communication between everybody at work.

Time away from work

- establish working arrangements to help maintain a good work/life balance; and
- ensure that you have adequate time away from work through paid annual leave.

Health and safety

- foster conditions that permit all our employees in each of our worldwide offices to work in a healthy and stimulating environment;
- carry out risk assessments and act on the recommendations of these assessments; and
- offer training in good practice in health and safety.

Support and wellbeing

- sustain an organizational culture embodying our values as well as respecting the right of each individual to be able to perform their role in a safe and secure workplace;
- ensure that bullying and harassment is not tolerated within the workplace;
- offer reasonable accommodation to anyone who may need it subject to our policies and procedures; and
- act promptly and appropriately in response to any complaints brought to our attention.

Managers should familiarize themselves with this policy, and other policies put in place to support their teams. In particular, managers should:

- keep your teams up to date with changes at work and how these might affect their jobs and workloads;
- ensure that employees know who to approach with problems concerning their role and how to raise issues with senior management;
- ensure jobs are designed fairly and that work is allocated appropriately between teams; and
- ensure that work stations are appropriate and fit for purpose.

If you have questions or concerns regarding this policy, you should contact Burford's human resources department.

Lighthouse reporting system

We are committed to providing a safe, respectful and ethical working environment. Burford employees are encouraged to use Burford's anonymous and confidential whistleblowing hotline, Lighthouse, in the event that any behavior or actions are not consistent with this Policy. Lighthouse is a program operated by an independent company that allows employees to report any concerns they may have about the way we are conducting our business, to identify any workplace behavior that they believe violates Burford's policies or to submit questions, ideas or suggestions.

Specifically, employees may use Lighthouse to report (confidentially and anonymously if you so choose):

- a. violations of Burford policies;
- b. improper accounting, accounting controls or auditing;
- c. bribery;
- d. conflicts of interest;
- e. illegal activities;
- f. theft or fraud;
- g. safety, health or environmental issues; and
- h. questions, ideas and suggestions.

How to contact Lighthouse—available 24 hours a day, 7 days a week

Either by phone:

- Call: in the US, dial 1-833-268-1510 (US); in the UK, dial 0800-89-0011 (British Telecom) and then dial toll-free 800-603-2869; or in Australia, dial 1-800-551-155 (Optus) or 1-800-881-011 (Telstra) and then dial toll-free 800-603-2869.
- Write down the report ID and password you are given.

- A written summary of your call will be sent to the appropriate Burford Capital contact.
- Your call can be anonymous. Leave your name and telephone number if you prefer someone from Burford to contact you directly.
- To receive a response from Burford, call back after five business days and provide your report ID and password.

Or by email:

- Email Burford@GetInTouch.com.
- Unless you indicate otherwise, your name and email address will be removed from the message before it is sent to Burford management.

Or by the Internet:

- Submit your issue or concern via the Internet at www.lighthouse-services.com/Burford.