

ANTI-BRIBERY AND CORRUPTION POLICY

Purpose and Scope

ALE Property Group (ALE) is committed to maintaining a culture, which reflects the highest standards of honesty, integrity and governance.

ALE officers and employees are required to conduct themselves in a manner consistent with the principles and values set out in the ALE Code of Conduct.

In setting this Policy, the Directors are guided by the following values:

- Honesty
- Integrity
- Transparency
- Respect and
- Responsibility.

ALE does not tolerate or accept any form of bribery or corruption. Corrupt activity of any kind is expressly forbidden. This policy summarises ALE's approach to managing its exposure to bribery and corruption.

What is Bribery and Corruption?

Bribery is the direct or indirect offer, payment or provision of a benefit to someone to influence the performance of their duty and/or encourage the misuse of their authority. Bribery can take many forms including:

- Giving cash or excessive gifts, including accommodation and travel,
- Giving or making political donations either directly or indirectly,
- Paying secret commissions,
- Making inflated tenders or false invoices,
- Blackmail or leveraging personal information to obtain advantage.

Corruption is the abuse of entrusted power for private gain.

It is illegal to bribe a Commonwealth or State official or to be involved in private bribery such as kickbacks or secret commissions. Bribery and corruption are criminal offences and may result in significant criminal and civil penalties such as imprisonment and/or fines for both individuals and corporations.

Managing Exposure

ALE has assessed the level of risk of bribery or corruption occurring. This assessment indicates a low risk for the business activities undertaken by ALE particularly in relation to foreign bribery risks. In terms of domestic bribery and corruption risk, ALE has assessed this as low. A key area of risk relates to the provision of gifts, hospitality and donations. It is critical to ALE that the provision of gifts and hospitality must be legal, at arm's length and made openly and in keeping with appropriate business relationships.

Bribes: Officers and employees are not permitted to procure or accept a bribe or secret commission whether directly or indirectly

Gifts: Officers and employees may not accept a gift of a value greater than \$300 unless approved by the Managing Director or Chairman. All gifts must be recorded in the soft-dollar register. Cash is not an acceptable gift.

Hospitality: Officers and employees may accept the following modest business-related hospitality with the approval from the Managing Director:

- Attend a work-related conference
- Attend a relationship-building event such as a meal/show/sporting event/presentation/workshop.

All hospitality must be recorded in the soft-dollar register.

Donations: ALE does not donate to political parties.

Charitable

Donations: ALE may only donate to charities that have deductible gift recipient status with the ATO approved by the Managing Director or Chairman.

This policy operates in alignment with the Receiving of Gifts and Benefits Policy in the Compliance Manual.

Communication and Training

ALE employs a small number of dedicated employees who must abide by the Code of Conduct and ALE core values. This policy is readily available to employee and is published on the Company's website. Employees are trained and aware of their obligations under the policy.

Governance Process

ALE periodically assesses its exposure to bribery and corruption risks and the controls used to manage these risks include:

- Annual operating risk review,
- Internal and external audit planning and reporting,
- Expense claims monitoring and approvals,
- Due diligence via on-boarding and ongoing screening of employees and outsourced service providers.

Confidential Reporting

ALE requires all officers and employees to act honestly and with integrity and report, any instance of suspected or evident bribery and corruption immediately to the Managing Director or Chairman.

If the concern is considered unsuitable to report to the Managing Director or the person wishes their identity to be protected, they should report the matter to the ALE External Recipient under the Whistle-Blower Policy.

All reports will be investigated and dealt with seriously. Any breach of this Policy will be subject to disciplinary action up to and including immediate termination of employment or engagement.

Review

ALE has adopted a Whistle-Blower policy, which provides guidance for raising concerns regarding Improper Conduct within ALE and how those concerns will be investigated. It also addresses the protection of individuals who make reports. All Directors and employees must comply with the Policy and follow the steps in the policy if they suspect any improper or unethical practice is occurring.

The Board will review this policy annually.

DATE LAST REVIEWED June 2021