



HOTEL PROPERTY INVESTMENTS LIMITED [ACN: 010 330 515]

CORRUPTION, ANTI-BRIBERY AND FRAUD PREVENTION & DETECTION POLICY

ACN: 010 330 515

VERSION 5

June 2024

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3	May 2019
4	May 2021
5	June 2024

1.0: POLICY

Hotel Property Investments Limited (**HPI** or the **Company**) is committed to promoting and maintaining the highest level of integrity and ethical standards in all its business practices. The Company expects all its employees, temporary staff, contractors and service providers to act in accordance with all applicable laws and regulations and in accordance with the Fundamental Principles espoused in the Company's Code of Conduct. The Company will adopt a zero level of tolerance to corruption, bribery or fraudulent behaviour and commits to thoroughly investigate all suspected incidents of corruption, bribery and fraud and take appropriate disciplinary action. This may include:

- termination of employment or service contracts with the Company; and
- where there is sufficient evidence of criminal activities occurring, the Company will support the prosecution of the relevant parties, either in the criminal or the civil courts, in accordance with local legislation.

2.0: APPLICATION AND SCOPE

- This policy applies to all employees, temporary staff, contractors, service providers and directors of the Company. This policy should also be read in conjunction with other HPI policies, including the:Code of Conduct;
- Security Trading Policy;
- Continuous Disclosure Policy;
- Risk Management Policy; and
- Whistleblower Protection Policy.

3.0: DEFINITIONS

Corruption is defined as a dishonest activity in which a person acts contrary to the interests of the Company and abuses their position of trust in order to influence a business outcome improperly, induce or reward improper conduct or achieve some personal gain or advantage for themselves or for another person or entity.

Examples of corrupt conduct include, but are not limited to:

- payment of secret commissions (bribes or gratuities) in money, or some other value, to other businesses, individuals or public officials;
- receipt of bribes or gratuities from other businesses, individuals or public officials;
- release of confidential information, other than for a proper business purpose, sometimes in exchange for either a financial or non-financial advantage;
- a staff member manipulating a tendering process to achieve a desired outcome; or
- a conflict of interest involving a staff member acting in his or her own self-interest rather than the interests of the Company.

Gifts and hospitality may be received or given, subject to the provisions of the Company's Code of Conduct. Consideration must be given to whether the circumstances surrounding the gift or hospitality, such as the value, frequency or timing, could be considered to give rise to undue

influence. Gifts and hospitality must be recorded in the register maintained by the Company Secretary.

Political donations can only be made in accordance with the Company's Code of Conduct.

Fraud is defined as an intentional act by one or more individuals among management, those charged with governance, employees or third parties, involving the use of deception to obtain an unjust or illegal advantage. A fraud can typically result in actual or potential financial loss to any person or entity however this is not always the case.

Examples of fraud could include, but are not limited to:

- misappropriation of funds, securities, stock, supplies or other assets including use of assets for private purposes;
- causing a loss to the Company or creating a liability for the Company by deception;
- impropriety in the handling or reporting of money or financial records;
- profiting from insider knowledge of the Company's activities;
- accepting or seeking anything of value from contractors, vendors or persons providing services or goods to the Company;
- false invoicing for goods or services never rendered or backdating agreements;
- submission of exaggerated or wholly fictitious accident, harassment or injury claims; or
- misuse of sick or family leave.

4.0: PREVENTION & DETECTION

The first line of defence against corruption, bribery and fraud within the Company is ensuring the Company maintains a robust internal control environment. Wherever possible and cost-effective to do so, management engineer preventative and detective controls into systems and processes to ensure that the Company's assets are safeguarded and the Company is protected against all forms of avoidable loss.

Employees, temporary staff, contractors, service providers and directors of the Company who become aware or suspect this policy has been breached by any person acting for or representing HPI should report the known or suspected breach to the Chairman of the Board, or the Chairman of the Board, Audit and Risk Committee.

In support of the Company's zero tolerance policy towards corruption, bribery and fraud, it has developed a Whistleblower Protection Policy. Amongst other things, the Whistleblower Protection Policy provides for:

- whistleblower anonymity (if requested) and a commitment to whistleblower protection; and
- multiples avenues to report suspected corruption, bribery or fraud including the nomination of a Whistleblower Protection Officer (WPO).

Where appropriate and subject to the Whistleblower Protection Policy, material breaches of this policy will be reported to the Board.

5.0: BREACHES OF POLICY

Failure to comply with the obligations under this policy may lead to disciplinary action being taken by HPI in accordance with the relevant policy and practices, which may result in dismissal for misconduct.

A breach of this policy may also expose an individual to criminal and civil offences and could result in imprisonment or a significant financial penalty. As required, HPI will refer offences to regulators or law enforcement agencies for further investigation and action.

6.0: FURTHER INFORMATION

Please contact your Manager if you require further information in relation to this policy.

7.0: REVIEW

The Board will review this policy from time to time to assess that it is operating effectively and to consider whether any changes are required.