

SUMMERSET GROUP HOLDINGS LIMITED

ANTI-BRIBERY & CORRUPTION POLICY

1. Policy Purpose and Scope

Summerset Group Holdings Limited (**Summerset**) is committed to ensuring that its business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. To help achieve this, we have adopted a zero tolerance approach to bribery, corruption and facilitation payments across all areas and levels of our business.

This policy applies to all “**Summerset Personnel**”, being all:

- (a) directors, officers, employees, contractors, consultants, temporary agency personnel and secondees of Summerset or any of its subsidiaries; and
- (b) agents and other third parties acting for or on behalf of Summerset or any of its subsidiaries.

This policy should be read in conjunction with the Gifts Policy, the Code of Conduct and the Whistle Blowing Policy.

2. Bribery and Corruption

Bribery is the offer, promise or giving of anything of value in order to improperly influence a person’s actions or decisions to gain or retain a business benefit.

Corruption is the misuse of entrusted power or office, whether in the public or private sector, for personal gain. Examples include money laundering, embezzlement, secret commissions, falsification of records and corruption of justice.

Bribery and corruption can be direct or indirect and can take many forms, including the provision or acceptance of cash payments, facilitation payments, kickbacks, political contributions, charitable contributions, social benefits, gifts, travel, hospitality and rebates or reimbursements.

Summerset has a zero tolerance approach to bribery and corruption. Bribery or corruption of, or by, Summerset Personnel in any form (whether direct or indirect) is strictly prohibited.

3. Facilitation Payments

A facilitation payment is an unofficial payment or provision of a benefit to a public official to secure or expedite a routine government action (such as the issue of a permit or licence).

Facilitation payments must not be made or offered by Summerset Personnel.

4. Political and Charitable Donations

Political donations must not be made to political parties, candidates, or to any political cause or election fund.

Charitable donations may only be made with CEO or CFO approval.

5. Compliance and Reporting

All Somerset Personnel are required to comply with this policy. Contractors, consultants, agents and other third parties engaged by Somerset are made aware of this policy by way of the Supplier Code of Conduct.

Any known or suspected instances of non-compliance with this policy should be discussed with your manager, or an Executive Leadership Team member. Alternatively, reports can be made to the Whistleblowing Officer or anonymously through the FairCall whistleblowing service, in accordance with the Whistle Blowing Policy.

Contraventions of this policy, including attempts to circumvent this Policy or deter individuals from reporting breaches of this policy, will be the subject of an investigation and may result in serious disciplinary action. Matters may also be referred to relevant law enforcement agencies.

6. Review

This policy will be reviewed on a regular basis, with any changes approved by the Board.