

Anti-Bribery and Corruption Policy

Date Reviewed: February 2025

Where *you* belong

PEET

Anti-Bribery and Corruption Policy

1 Introduction

At Peet Limited, we seek to conduct business with the highest standards of ethics and integrity. We are committed to:

- Avoiding any involvement in corrupt practices.
- Adhering to all relevant anti-bribery and corruption laws.
- Implementing effective measures to prevent bribery and corruption within our organisation and among those representing us.

This policy aims to:

- Clarify the expected conduct for all personnel and associated parties in upholding our ethical standards.
- Provide guidance on identifying and addressing potential bribery and corruption issues, ensuring compliance with this policy and legal obligations.

2 Scope

This policy applies to all individuals associated with Peet Limited, including directors, officers, employees, agents, and any other parties acting on our behalf or under our operational control (collectively referred to as **Peet Limited Personnel**).

3 Definition of Bribery and Corruption

Anti-bribery and corruption laws encompass regulations that prohibit bribery and corrupt activities, applicable to our operations and those of our business partners, syndicates, joint ventures, or third parties acting on our behalf. Key relevant laws include:

- The Criminal Code Act 1995 (Cth).
- The Corporations Act 2001 (Cth).
- The Proceeds of Crime Act 2002 (Cth).
- Any other applicable anti-corruption laws at the Commonwealth or State level in Australia.

These laws are comprehensive, prohibiting corrupt conduct in both public and private sectors.

Bribery involves offering, promising, giving, or accepting anything of value with the intent to improperly influence someone's actions. Examples include:

- Monetary payments or equivalents (e.g., shares, gift cards).
- Excessive gifts, entertainment, or hospitality.
- Unwarranted benefits to relatives, such as employment or educational opportunities.
- Inflated invoices or false billing.
- Unjustified allowances or expenses.
- Political or charitable contributions intended to influence decisions.
- Unauthorised use of company services or facilities.
- Facilitation payments.

Corruption refers to dishonest activities involving the abuse of power or trust to gain an unfair advantage, whether personal or organizational. It includes bribery and other unethical conduct.

Facilitation payments are small sums given to Public Officials to expedite routine actions they are already obligated to perform. Such payments are prohibited under this policy.

Public Official is a broad term encompassing any official or employee of a government-owned or controlled organisation.

4 Compliance with This Policy and Anti-Bribery and Corruption Laws

Peet Limited Personnel must:

- Act in accordance with our various codes and policies, including our Code of Conduct.
- Read, understand, and comply with this policy.
- Report any requests for improper payments (including facilitation payments) promptly.
- Be vigilant for signs of corrupt conduct and report or seek guidance on any suspected violations.
- Maintain accurate records of interactions with third parties.
- Conduct appropriate due diligence on agents, joint ventures, and business partners to ensure compliance with this policy.

Prohibited Conduct

Peet Limited Personnel must not:

- Engage in bribery or corrupt activities, including offering, giving, accepting, or requesting bribes.
- Make facilitation payments, even if they are customary in certain regions.

If uncertain about the acceptability of specific conduct, seek guidance from the Group Company Secretary or Company Secretary – Funds and Subsidiaries before proceeding.

5 Interactions with Public Officials

Engaging with Public Officials carries a higher risk of bribery and corruption. To mitigate this risk:

- Peet Limited does not make political donations to any political party, politician, or candidate for public office unless approved in advance by the Managing Director.
- Attendance at political events requires prior approval and must be for legitimate business reasons, with attendance records maintained.

In certain situations, providing gifts, entertainment, or hospitality to Public Officials may be appropriate. In such cases:

- Obtain prior approval from the Managing Director.
- Ensure that the gift, entertainment, or hospitality does not comprise of Prohibited Conduct.

6 Engagements with Third Parties

Actions of third parties representing Peet Limited pose specific risks. To minimise these risks:

- Conduct thorough due diligence on third parties.

- Ensure that third parties adhere to anti-bribery and corruption standards consistent with this policy.

7 Reporting Suspected Bribery or Corruption

If you observe or suspect bribery or corruption, including requests for facilitation payments, report your concerns immediately to your manager, the Group Company Secretary, the Company Secretary – Funds and Subsidiaries, the Managing Director, or through the Whistleblower Policy. If uncertain about specific conduct, seek guidance from the Company Secretary or Company Secretary – Funds and Subsidiaries.

8 Record Keeping

Peet Limited will maintain accurate and complete records to document the business rationale for payments to third parties.

9 Training and Communication

Peet Limited will communicate this policy to all employees and provide training as necessary to ensure understanding and compliance.

10 Consequences of Policy Breach

Breaches of this policy are considered serious misconduct and will be thoroughly investigated. Disciplinary actions may include reprimands, warnings, demotion, or termination of employment. Serious breaches may be reported to regulatory and law enforcement agencies. Bribery and corruption are criminal offenses with severe consequences, including fines and imprisonment.

11 Policy Review

This policy may be amended or replaced at Peet Limited's discretion.