

Gifts and Benefits Policy

This policy applies to all directors, officers, employees and contractors of ACEN Australia Pty Ltd (ACN 616856 672) and its subsidiaries ("ACEN").

This policy should be read in conjunction with ACEN's Code of Conduct, Anti-Bribery and Corruption Policy, and Whistleblower Policy.

A gift or benefit is any item or service accepted from clients, customers (including potential clients and customers) or other associates, in the course of official duties. This includes any service or item received by the family of an employee, where there is a clear link with the employee's official duties. Hospitality may include offers of meals, or to attend business networking events, sporting events, cultural events or other functions.

Directors, officers and employees must not accept gifts or invitations from any supplier, customer or business partner of ACEN or from any third person or entity with existing or intended business dealings with ACEN, except when the gift or invitation is:

- i. directly attributable to purely familial or personal relationships;
- ii. only of nominal value (that is, less than \$100);
- iii. a simple promotional item or is part of the supplier's public relations program; or
- iv. part of business meetings or discussions.

When the gift does not fall under any of the above-mentioned conditions, ACEN encourages the director, officer or employee concerned to refuse the gift or if not practicable, turn over the gift to the Head of Corporate Services for inclusion in ACEN's Christmas party raffle (or such other corporate activity) or record it in the gifts register.

Mandatory Principles for responding to offers

Directors, officers, employees and contractors must **never**:

- Seek or solicit a gift, benefit or hospitality.
- Accept any offer:
 - If you are working in a high-risk area/engagement (where you have a level of discretion in decision-making that can impact on the stakeholder)
 - That may be perceived as presenting a conflict of interest or compromising ACEN's integrity or your own
 - That is intended to influence you to act in the interest of the giver or is seen as a bribe
 - Of cash or equivalent including gift vouchers, shares, loan, sponsored travel, memberships, use of facilities or discounts on commercial items regardless of the amount

What to do if you are offered a gift, benefit or hospitality

Token gifts, benefits or hospitality of nominal value (under \$100) such as a coffee or a meal during a meeting or working group can usually be accepted and are not required to be declared. Similarly, due to the nature of the work being undertaken by the Company, invitations to attend industry events are a normal part of stakeholder functions, including event dinners, and are not required to be declared.

The following guidelines should be adhered to when responding to offers of a gift or benefit:

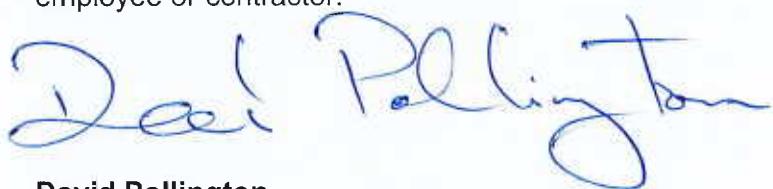
- Any gift, benefit or offers of hospitality with a value over \$100 must be recorded in the Gifts register by completing the attached Gift and Hospitality Registration Form and submitting it to the Company Secretary.
- Gifts, benefits or offers of hospitality with a value over \$300 must be approved by your Australian Management Committee (AMC) member and must be recorded in the Gifts register. Gifts or benefits made to an AMC member must be approved by the Managing Director.
- Gifts, benefits or offers of hospitality made to Directors, including the Managing Director, with a value over \$300 must be approved by the Group General Counsel (Dodjie Lagazo)

Maintenance of the Gift Register

The Company Secretary is responsible for maintaining the Gifts register for all reportable gifts, benefits and hospitality, including decisions to not accept offers that are significant in value or influential in nature.

Non-compliance with this policy

A breach of this policy may result in disciplinary action being taken against any director, officer, employee or contractor.

A handwritten signature in blue ink that reads 'David Pollington'.

David Pollington
Managing Director
ACEN Australia
25 July 2024