

ANTI-BRIBERY AND CORRUPTION POLICY

ALPHA HPA LIMITED

ABN 79 106 879 690



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1 BACKGROUND AND PURPOSE

Alpha HPA Limited (**Alpha HPA**) is committed to complying with the laws and regulations of the countries in which it operates. These laws include the Criminal Code Act 1995 (Australia) and any other anti-corruption law of a country or a state, territory or province of a country in which Alpha HPA operates, or which otherwise applies to Alpha HPA by virtue of its partners or third parties operating on Alpha HPA's behalf (together **Anti-Bribery and Corruption Laws**).

Anti-Bribery and Corruption Laws may impose serious criminal offences for misconduct in which Alpha HPA and any individual is involved.

Alpha HPA takes a zero-tolerance approach to any actual or attempted use of any form of Bribery or Corruption whether direct or indirect and whether involving public officials or private persons.

The purpose of this policy is to:

- a) outline the expectations and key elements of Alpha HPA's anti bribery and corruption program of activities to prevent, detect and deter Bribery and Corruption.
- b) outline the responsibilities of Alpha HPA Personnel when acting for or on behalf of Alpha HPA in observing and upholding Alpha HPA's position against bribery and corruption.
- c) this Policy should be read in conjunction with our related policies and procedures as outlined in section 13.

2 APPLICATION

This Policy is applicable to all executive and non-executive directors, officers, employees, consultants, contractors and advisors of Alpha HPA (**Alpha HPA Personnel**).

3 OBJECTIVES

Alpha HPA is committed to responsible corporate governance, including conducting its activities lawfully and with integrity. Bribery and Corruption are incompatible with the Code of Conduct, our Statement of Values and integrity expectations of all Alpha HPA Personnel.

To achieve this objective, Alpha HPA will:

- a) not engage in corrupt business practices;
- b) implement measures to prevent bribery and corruption by all Alpha HPA Personnel;
- c) at a minimum, endeavour to comply with all applicable laws, regulations and standards, including Anti-Bribery and Corruption Laws; and
- d) when dealing with third parties, undertake reasonable due diligence to ensure that such parties are suitable for Alpha HPA to associate with and will not make bribes or perform corrupt acts on Alpha HPA's behalf or for which Alpha HPA may be or become responsible for, or otherwise liable.

4 ALPHA HPA'S AB&C COMPLIANCE PROGRAM

Alpha HPA's AB&C Compliance Program is administered by the Chief Financial Officer and provides a framework that:

- raises awareness of anti-bribery and corruption risks.
- delivers compliance training and promotes ethical business conduct.
- maintains systems and procedures for giving, receiving and registering Gifts and Benefits.
- maintain systems and procedures for conducting due diligence on Third Parties.
- investigates any reported suspicions of bribery or corruption involving Alpha HPA.

5 RESPONSIBILITIES

Alpha HPA Personnel are required to:

- understand and comply with this Policy;
- act ethically and with integrity, avoiding even the appearance of impropriety;
- attend and participate in training sessions relating Alpha's integrity framework (e.g. Code of Conduct, gifts and benefits);
- maintain timely, accurate and complete records of all expenditure and payments; and
- immediately report any suspicious activities in good faith.

In addition, Alpha HPA Personnel who exercise managerial supervision over Alpha HPA Personnel and/or Third Parties must also:

- ensure all persons under his or her supervision understand their obligations under this Policy;
- never request or suggest that Alpha HPA Personnel and/or Third Parties pursue or achieve business results at the expense of breaching this Policy or an Applicable Law;
- respond appropriately to questions and concerns related to this Policy (including referring Alpha HPA Personnel and/or Third Parties to the Chief Financial Officer, if appropriate).

6 KEY PRINCIPLES OF BRIBERY AND CORRUPTION

6.1 BRIBERY

Bribery is a form of corruption and refers to the act of offering, promising, giving, accepting or soliciting of a benefit (i.e. anything of value) to any person, including a public office, in order to improperly influence an act or decision so as to gain a business or personal benefit or advantage.

Examples of Bribery include Trading in Influence, secret commissions, creating or using false documents for corrupt purposes and engaging in intimidation for corruption purposes.

A bribe can be provided directly or indirectly (for example, through a Third Party) and it is irrelevant whether the bribe is successful in improperly influencing the other person or in securing the business or personal advantage – what matters is the intention of the person engaging in the Bribery.

Examples of a bribe can take the form of gifts, loans, fees, rewards or other advantages (**Bribe**).

Alpha HPA personnel are not permitted to give, offer, promise, accept, request or authorize a Bribe, whether directly or indirectly.

6.2 CORRUPTION

Corruption means the abuse of a position of employment, authority or trust to gain a business or personal benefit or advantage. It can also include making improper requests of public officials whereby the public official is asked to breach or contravene an applicable law or exceed their scope of authority.

Alpha HPA Personnel must not engage in any form of Corruption, whether for their benefit, the benefit of Alpha HPA, other Personnel or any other person.

7 GIFTS AND BENEFITS

Gifts and Benefits made in good faith can be a legitimate way of fostering and maintaining good business relationships. This Policy does not intend to prohibit reasonable and proportionate Gifts and Benefits for that purpose.

However, exchanges of Gifts and Benefits (including Anything of Value such as gifts, meals, travel, entertainment and hospitality) made in the ordinary course of business may compromise, or appear to compromise, the exercise of objective professional judgement.

Alpha HPA Personnel must not give a gift and benefits that is intended to induce conduct of any kind, as doing so constitutes a Bribe and is prohibited by this policy.

Alpha HPA Personnel must not receive a gift and benefits that is intended to induce conduct of any kind, or which will induce conduct of any kind, as doing so constitutes Corruption and is prohibited by this policy.

Alpha HPA Personnel may give or receive genuine gifts or incur or accept hospitality and entertainment expenditure, provided that such gifts or expenditure:

- a) is given or received as a common courtesy, act of appreciation or in accordance with local custom or standard business practice;
- b) does not place the recipient under any obligation and cannot reasonably be construed as an attempt to improperly influence the performance of the role or function of the recipient;
- c) is given or received in an open and transparent nature;
- d) is of reasonable value, proportionate to the business relationship in which it is given or received;
- e) complies with all local laws, including Anti-Bribery and Corruption Laws, within the jurisdiction in which the gift is given or received or expenditure incurred or accepted; and
- f) does not constitute the payment or acceptance of cash or cash equivalents, such as gift cards.
- g) upholds the Alpha HPA values

7.1 GIFTS AND BENEFITS REGISTER

7.1.1 The Gifts and Benefits Register

Alpha HPA maintains a register of all gifts and benefits (including entertainment and hospitality) (clause 7), payments to government officials (clause 9) and charitable donations (clause 10) made by Alpha HPA or by any Alpha HPA Personnel (**Gift and Benefits Register**).

7.1.2 Record Keeping

Alpha HPA Personnel must record complete, accurate and auditable details of all gifts, benefits (hospitality and entertainment), payments to government officials and charitable donations in the Gift and Benefits Register. All records in the Gift and Benefits Register must contain reasonable detail and be recorded in accordance with generally accepted accounting principles. No entry should be made into the Gift and Benefits Register that distorts or disguises the true nature of any transaction.

7.1.3 Recording Gifts and Benefits

Alpha HPA Personnel must record any gift given or expenditure incurred in Alpha HPA's Gift and Benefits Register within 7 days and must obtain the prior approval of the Managing Director or chair of the Board prior to giving any gift or incurring any expenditure in excess of \$1,000.

Alpha HPA Personnel must record any gift received or hospitality or entertainment accepted with a reasonable value in excess of \$1,000 in Alpha HPA's Gift and Benefits Register and should, where practicable, raise any proposed gift, hospitality or entertainment offer with the Managing Director or chair of the Board prior to receiving any gift or accepting any hospitality or entertainment.

8 DEALING WITH GOVERNMENT OFFICIALS

8.1 GOVERNMENT OFFICIALS

In this policy, a reference to "government officials" means:

- a) any political party, party official or candidate of political office;
- b) any official or employee of a government (whether national, state, provincial or local) or agency, department or instrumentality of any government or any government-owned or controlled entity (including state owned enterprises);
- c) any official or employee of any public international organisation;
- d) any person acting in an official function or capacity for such government, agency, instrumentality, entity or organisation;
- e) any person who holds or performs the duties of any appointment created by custom or convention or who otherwise acts in an official capacity (including, some indigenous or tribal leaders who are authorized and empowered to act on behalf of the relevant group of indigenous peoples and members of royal families);
- f) any person who holds themselves out to be an authorized intermediary of a government official.

8.2 FACILITATION PAYMENTS

Facilitation payments are small payments or other inducements provided (either directly or indirectly) to a government official to secure or expedite a routine function or action that government officials are ordinarily obligated to perform and are generally not intended to influence the outcome of the official's action, only its timing (**Facilitation Payments**).

Alpha HPA Personnel must not make any Facilitation Payments, whether legal or not in a particular country, and all Facilitation Payments are prohibited under this policy.

8.3 GIFTS AND ENTERTAINMENT

Alpha HPA Personnel must exercise additional caution in relation to the offering or giving of gifts, hospitality and entertainment to government officials.

While all gifts, hospitality and entertainment must comply with general gift giving obligations contained in clause 7, Alpha HPA Personnel must obtain the approval of the Managing Director and chair of the Board prior to giving any gift or providing any hospitality or entertainment to government officials.

8.4 POLITICAL DONATIONS

Alpha HPA will only donate or contribute towards political parties, politicians or candidates where such donation or contribution is consistent with this policy, Alpha HPA's values and has been approved by the Board in advance.

8.5 ATTENDANCE AT POLITICAL FUNCTIONS

Alpha HPA Personnel may attend political functions where there is a legitimate business reason for attendance and where approved by the Board in advance.

8.6 POLITICAL LOBBYING

Alpha HPA Personnel are generally prohibited from engaging in political lobbying unless they have been expressly authorized to do so by the Board. Any political lobbying conducted by authorized employees must be done in a manner consistent with this policy and Alpha HPA's values.

9 CHARITABLE DONATIONS

Alpha HPA supports charitable causes from time to time, including by making charitable grants or donations or giving financial or other assistance, or sponsoring a person or activity on a charitable basis, without expectation or acceptance of favourable action or the exercise of influence.

In limited circumstances, a charitable grant or donation may pose a risk of corruption – for example, if made to an artificial or non-genuine charitable organisation or an entity which ultimately benefits a non-charitable third party, such as a government official.

To address this risk, charitable grants and donations by Alpha HPA must:

- a) be made only to not-for-profit organisations;
- b) be accurately recorded in Alpha HPA's records;
- c) be tax-deductible; and
- d) not be made in cash or to private accounts.

For monetary thresholds, Alpha HPA Personnel should refer to the Delegations of Authority.

10 REPORTING BRIBERY AND CORRUPTION

Alpha HPA Personnel must immediately report any suspected, attempted or actual incidents of Bribery, Corruption, or breaches of this Policy at first instance to the Chair of the Risk and Sustainability Committee via RSC@alphahpa.com.au. There are no thresholds that apply to reporting incidents of Bribery, Corruptions or breaches of this Policy.

Alpha HPA will treat all reports received in connection with this policy in the strictest confidence. Alpha HPA Personnel should not attempt to personally conduct any investigations or enquiries into a suspected act of bribery or corruption related to Alpha HPA. Alpha HPA Personnel will not face any form of retaliation, reprisal or detriment from Alpha HPA for raising a concern or reporting conduct in violation of this policy in good faith.

10.1 POLICY BREACHES AND CONSEQUENCES

Alpha HPA acknowledges that Bribery and Corruption are very serious criminal and civil penalties for Alpha HPA and Alpha HPA Personnel and any breach of this policy is a serious matter which will be thoroughly investigated and addressed. It may also have substantial reputational consequences, and impact Alpha HPA's relationship with customers, stakeholders and the communities in which we operate.

Alpha HPA may take disciplinary action against anyone who breaches this policy, which (depending on the severity or quantity of the breach(s)) may include:

- a) reprimands;
- a) formal warnings;
- b) suspensions;
- c) demotions; and/or
- d) termination of employment or contracts.

11 TRAINING

Where deemed necessary as determined by Alpha HPA in its sole and absolute discretion, Alpha HPA will provide training to its Alpha HPA Personnel about this Policy and how to uphold Alpha HPA's position against bribery and corruption.

12 DEFINITIONS

TERM	DEFINITION
AB&C Compliance Program	A program of key principles and activities embedded in the Anti-Bribery and Corruption Policy which are used to identify inherent bribery risk and assess adequacy of policies, controls, processes, and systems to prevent bribery and corruption.
Agents	Agents means any individual or entity, including any personnel working for such individual or entity, engaged to act on behalf of Alpha HPA (with the authority to bring Alpha HPA into contractual relationships with other parties) and/or represent Alpha HPA (having the authority to describe itself as Alpha HPA's representative in dealing with other parties).
Alpha HPA, Company	Alpha HPA Limited
Bribe or Bribery	Bribe or bribery is defined under AS8001-2021 and ISO37001:2016 as offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.
Conflict of Interest	Conflict of Interest is defined under AS8001-2021 as a situation where business, financial, family, political or personal interests could interfere with the judgement of persons carrying out their duties for the organisation.
Corruption	Corruption is defined under AS8001-2021 as dishonest activity in which a person associated with an organisation (e.g. director, executive, manager, employee or contract) acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage of another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of and in the interests of the organisation, in order to secure some form of improper advantage for the organisation either directly or indirectly.
Personnel	Includes all executive and non-executive directors, officers, employees, consultants, contractors and advisors of Alpha HPA.
Third Party	Is any individual or entity (not staff or part of Alpha HPA) with whom Alpha HPA has or plans to enter a business relationship. A Third Party may include, but is not limited to, persons or entities that: • provide goods or services to Alpha HPA (e.g. contractors, suppliers, vendors and external consultants) • act for or on behalf of Alpha HPA; or • enter or maintain a business partnership or relationship with Alpha HPA (e.g. general business partners, joint venture, partners).

Trading in Influence	Also known as influence peddling, trading in influence occurs when a person who as real or apparent influence on the decision-making of a public official exchanges this influence for an undue advantage. The offence is similar to bribery with one important difference: trading in influence concerns the "middleman", or the person that serves as the go-between the decision-maker and the party that seeks an improper advantage. The final decision-maker may not even be aware of the illicit exchange.
Investigation	Investigation is defined under AS8001-2021 as a search for evidence connecting or tending to connect a person (either a natural person or a body corporate) with conduct defined by this Standard as fraud or corruption.

13 DOCUMENT CONTROL TABLE

DOCUMENT INFORMATION	
Document approver	Managing Director
Document owner name	Chief Financial Officer
Document version number	2.0
Document version date	3 September 2025
Document review cycle	Every two years
Next Document review date	3 September 2027
LINKED ARTEFACTS	
Linked documents	• Code of Conduct • Delegations of Authority • Fraud Management Policy • Enterprise Risk Register • Gifts and Benefits Register • Statement of Values • Supplier Code of Conduct • Whistleblower Policy
Linked legislation	• Corporation Act 2001 • the Australian Criminal Code Act 1995;
Linked risks	• Reputational • Regulatory • Finance