



TRAVIS
P A R T N E R S

Anti-Bribery and Corruption Policy

Alloggio Group Limited ACN 645 582 225 (**Company**)

Anti-Bribery and Corruption Policy

1	Introduction	3
2	Bribery and Corruption	3
3	Compliance	4
4	Consequences for Breaches	4
5	Review	4

Anti-Bribery and Corruption Policy

1 Introduction

1.1 Commitment

The Company is committed to maintaining a high standard of integrity and conducting its business activities in accordance with the law and in an ethical, lawful, and socially responsible manner. Engaging in bribery and corrupt conduct is contrary to this commitment and exposes the Company to significant reputational damage as well as the risk of individuals being persecuted, fined or imprisoned.

1.2 Purpose

This purpose of this Policy is to ensure the Company and its related bodies corporate (**Group**) comply with all applicable anti-bribery and corruption laws.

This Policy sets out the requirements of the Group regarding the management of gifts and benefits and applies globally and to all employees, officers, directors and in certain circumstances, consultants, contractors, agents and intermediaries representing the Group (**Group Members**).

A copy of this Policy and our Code of Conduct are available on our website.

2 Bribery and Corruption

Bribery and corruption involves offering, promising, giving a benefit, accepting or soliciting a favour, a gift or anything of value with the intention of unduly influencing the behaviour of a person in the performance of their duty in order to obtain or retain business or some other improper advantage.

This Policy prohibits Group Members from:

- (a) offering, paying, receiving or facilitating bribes, whether directly or indirectly, and including political and charitable contributions;
- (b) offering, paying, receiving or facilitating secret commissions as an inducement or reward for using their position to influence the conduct of the Company's business;
- (c) offering or accepting gifts, charitable donations and hospitality which may place the recipient under an obligation or create an expectation that the giver will receive a special benefit. Any gift, entertainment or other personal favour or assistance given or received which value exceeds \$250.00 (or any other amount determined or announced by the Board) must be approved in advance by the CEO and entered into the gifts register maintained by the Company; and
- (d) intentionally or recklessly making, altering, destroying, concealing, or doing something with an accounting document with the intention of or concealing or disguising a practice prohibited by this Policy.

3 Compliance

3.1 Group Member Responsibilities

Every Group Member must:

- (a) ensure that they read, understand and comply with this Policy;
- (b) ensure they abide by all applicable anti-bribery and corruption laws and regulations;
- (c) comply with the terms of this Policy and avoid partaking in any behaviour that may lead to, or suggest, a breach of this Policy; and
- (d) immediately report any concern, suspected or potential breaches of this Policy to either the CEO or Company Secretary as soon as possible. Notifications may also be made pursuant to the Company's Whistleblower Protection Policy.

3.2 Education and Training

The Company will provide education and training to all Group Members to assist in their understanding of what conduct is unlawful and otherwise prohibited under this Policy and how to recognise, manage and report any subsequent breaches of this Policy.

3.3 Compliance overview

The Company Secretary is responsible for the overall administration of this Policy and must periodically monitor the implementation of this Policy and review on an ongoing basis.

4 Consequences for Breaches

Any suspected breaches of this Policy will be reported to the Board and thoroughly investigated. A breach of this Policy may result in disciplinary action, including termination of employment or contract.

The Company also reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of any law which may attract serious criminal and civil consequences, such as imprisonment or fines.

5 Review

The Board will review this Policy annually with input from the Audit and Risk Committee to ensure that it is operating effectively and whether any changes are required to the Policy. This Policy may be amended by resolution of the Board.

Adopted by the Board on 17 September 2021.