

# Dexus Compliance Policy

## Anti-bribery



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Dexus is committed to achieving the highest corporate standards and does not tolerate unethical or unprofessional behaviour including bribery and corruption. Dexus acknowledges that ethical and professional behaviour emanates from the most senior levels of management.

To assist all employees in understanding Dexus's expectation in relation to ethical behaviour, policies and procedures have been developed including Codes of Conduct, Good Faith Reporting Policy, Fraud & Corruption Control and Awareness Policy and this Anti-Bribery Policy.

### 1. Lobbying

Dexus takes pride in its ethical and socially responsible conduct.

As a market leader in the property funds management industry, Dexus is in a position to influence industry policy. We have an obligation, on behalf of our investors and the broader community, to make a positive and constructive contribution to policy development relating to the property industry and to participate in the policy decision-making process.

We also have an obligation to develop and manage our assets in the interests of our investors and broader community.

#### Meetings with Law Makers

As part of Dexus's property management and development activities, employees may need to meet with representatives of local, state or federal government.

Discussions are property specific covering issues such as zonings, planning approvals and infrastructure.

In accordance with the NSW Lobbyists Code of Conduct Regulation 2014, where a Dexus employee meets with a government official to discuss zonings, planning approvals and infrastructure, the employee will:

- disclose to the official before the meeting the nature of the matter to be discussed
- disclose to the official before the meeting commences any financial or other interest Dexus has in the matter to be discussed
- not engage in misleading, dishonest, corrupt or other unlawful conduct in connection with the meeting
- use all reasonable endeavours to satisfy themselves of the truth and accuracy of all material information provided in connection with the meeting

At all times, the interests of investors and the broader community are taken into consideration.

In situations where Dexus believes it is beneficial to appoint a professional Lobbyist to act on its behalf, approval must be granted by the CEO. The appointed Lobbyist must be appropriately registered and confirm he/she will comply with the NSW Lobbyists Code of Conduct Regulation, 2014.

At no time will gifts or entertainment of an excessive nature be offered to representatives of the government or statutory authority.

#### Industry Lobbying

To support and encourage effective policy development for the property industry, Dexus works closely with the Property Council of Australia developing recommendations and drafting submissions to government and statutory authorities.

Dexus may be requested to participate in working groups facilitated by the PCA. In these situations, Dexus representatives will act for the benefit of the property industry as a whole.

### 2. Donations

In NSW (for state and local governments), Dexus and its employees are prohibited from making any financial or in-kind contributions to a political party, politician or related institution (including payment of any annual or other subscription fee for membership of or affiliation with any political party).

However, Dexus employees may, subject to relevant legislative requirements and in their personal capacity (and not as a representative of Dexus):

- make financial or in-kind contributions to a political party, politician or related institution federally and/or in any state (including being a paid member of a political party), other than in NSW; and/or
- attend federal or state political functions (other than any political fundraising event in NSW which requires the purchasing of a ticket or another form of payment, unless it is clear that none of the proceeds are for the benefit of the relevant political party).

As a responsible corporate citizen, Dexus makes charitable donations. Financial donations are made to registered charities or approved not-for-profit organisations. Financial donations are not made to religious organisations.

### 3. Gifts & Benefits

The receipt and giving of gifts, benefits or entertainment should not be so lavish or excessive as to operate (or imply to operate) as an inducement to do business or imply an attempt to influence a business decision.

In NSW, the giving of any gift to a Government representative (state or local governments) by any Dexus Board or GMC member (or their spouse) is prohibited. A 'gift' for the purposes of this policy includes attending a government fund-raising function if that fund-raising function requires payment of a fee or other contribution to attend. This means that any Dexus Board or GMC member (or their spouse) may not attend any NSW Government fund-raising function that requires a fee to be paid (even in their respective personal capacity), unless it is clear that none of the proceeds are for the benefit of the relevant political party (for example, if all proceeds are expressed to be for the benefit of a charity).

There must be no conflict or appearance of conflict between the self-interest of any employee and their responsibility to Dexus and its clients.

Gifts of cash are prohibited and offers of cash are to be reported to the Risk & Compliance team immediately.

Gifts given to employees by suppliers, service providers and other business associates should be surrendered to Dexus. Dexus will use the items for charitable fund raising activities and where possible, donate any perishable short shelf life items to a local charity. Gifts of a nominal value (ie below \$100) may be retained by the employee.

All gifts, benefits or entertainment offered during a decision making process e.g. major procurement or tender must be declined.

Where an employee is involved in a tender process, they must declare that they are not conflicted, will not accept gifts or benefits from the organisation tendering and will act in the best interests of Dexus and its clients.

Travel and accommodation in respect of proposed entertainment is generally not allowed and must be referred to Risk & Compliance.

All employees will be required to provide a declaration to Risk & Compliance on an annual basis confirming compliance with these policies.

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