



TERRA FIRMA EQUITY LIMITED
ACN 675 999 747

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Document type

Version

Approved by

Approval date

Corporate policy

1.0

Board of Terra Firma Equity Limited

25 February 2026

1. Purpose

This Policy prohibits bribery, corruption and improper payments in connection with the business of Terra Firma Equity Limited and its controlled entities.

2. Application

This Policy applies to directors, officers, employees and contractors acting for or on behalf of the Company. The Company expects agents, advisers, suppliers and business partners to observe equivalent standards where relevant.

3. Prohibited conduct

- (a)** offering, promising, giving, requesting or accepting a bribe or other improper benefit;
- (b)** making facilitation payments, except where a payment is lawfully required and appropriately documented;
- (c)** using a third party to do anything that would be prohibited if done directly;
- (d)** providing gifts, hospitality, sponsorships or donations for an improper purpose;
- (e)** concealing or misdescribing payments, benefits or transactions; and
- (f)** retaliating against a person who raises a genuine concern.

4. Gifts and hospitality

Gifts and hospitality must be reasonable, proportionate, transparent and connected to a legitimate business purpose. They must not be offered or accepted where they could improperly influence, or reasonably be perceived to influence, a decision.

Material or unusual gifts and hospitality must be disclosed and approved in accordance with applicable delegations.

5. Third parties

Appropriate due diligence should be undertaken before engaging higher-risk intermediaries, agents, consultants or counterparties. Contract terms should address integrity obligations where appropriate. Payments must be made only for legitimate services or obligations and must be accurately recorded.

6. Political and charitable contributions

Political donations or contributions may only be made where lawful and expressly authorised by the Board or under a written delegation. Charitable contributions must not be used to obtain an improper business advantage.

7. Books and records

The Company must maintain accurate books and records that fairly reflect transactions and disposition of assets. False, misleading, incomplete or off-book records are prohibited.

8. Reporting and investigation

Suspected breaches should be reported promptly to an appropriate manager, the company secretary, legal counsel or through the Company's whistleblower channels.

The Company may investigate suspected breaches and take disciplinary, contractual or legal action where appropriate.

9. Breach of policy

A breach of this Policy may result in disciplinary action up to and including termination of employment or engagement and may expose individuals and the Company to civil or criminal liability.

10. Review

The Board may amend this Policy at any time.