

Anti-Bribery & Corruption

Hibernia Real Estate Group Limited (“Hibernia”) is committed to conducting all aspects of its business in a fair, open and honest manner and never using bribery or corruption to gain an unfair advantage. Our policy is clear and unambiguous and simply states that any form of bribery is never acceptable and will not be tolerated.

This policy applies to all employees of Hibernia and may extend to family members, friends or any connected persons who are in receipt of a gift, benefit or inducement where there is a perceived or actual connection to Hibernia.

Policy

Hibernia has detailed, proportionate and documented procedures in place to mitigate identified bribery and corruption risks and to prevent unethical conduct of individuals. These policies include:

Gifts & Inducements

Hibernia has a comprehensive gifts and inducements policy with specific monetary limits where certain approval is required. This policy is not intended to apply to routine business lunches, dinners and social functions of a work-related and reasonable nature and these do not require prior approval. The policy is intended to cover anything which could be viewed as entertainment e.g. sporting events and other leisure activities and personal gifts.

The key principle is that gifts, benefits or inducements should neither be offered nor received if they create or appear to create an obligation, affect either party’s impartiality or constitute an undue influence on a business decision.

Fraud

Hibernia prohibits the offering, the giving, the solicitation or the acceptance of any bribe to or from any person or company by any person acting on Hibernia’s behalf in order to gain any advantage for Hibernia or the individual.

Hibernia has very clear processes and controls around the financial reporting process to ensure that false or misleading entries that fail to reflect improper transactions do not take place. These controls include detailed financial procedures, a comprehensive budgeting process, an external and internal audit process and thorough oversight of financial statements by Brookfield.

Political and charitable donations

Hibernia does not make any political donations and a declaration to this effect is contained in the Annual Report. Hibernia makes donations to and organises events to raise funds for a variety of charities which may be nominated by staff or other stakeholders.

Lobbying

All details of lobbying are documented by the Risk & Compliance Officer and are submitted to the Register of Lobbying on a four monthly basis.

Whistleblowing

The prevention, detection and reporting of bribery is the responsibility of all employees. Hibernia has detailed whistleblowing procedures to facilitate a confidential and accessible means for employees to raise any concerns about bribery and corruption.

All policies are communicated to all new employees on joining the organisation and periodic training on a variety of different issues is provided to all staff on an ongoing basis as part of the continuing professional development (CPD) programme.

Hibernia periodically monitors, reviews and evaluates bribery prevention procedures to ensure that they remain appropriate and relevant to the risks in Hibernia.