ARENA REIT

ANTI-BRIBERY AND CORRUPTION POLICY

May 2026

1. Introduction

Arena is committed to operating in accordance with all applicable laws and regulations and in accordance with the highest standards of ethical behaviour.

2. Definitions used in this policy

In this policy, unless the context otherwise requires:

- Arena means Arena REIT Limited and its subsidiaries.
- Board means the Board of Directors of Arena REIT Limited.
- Bribery means the offering, promising, giving, accepting or soliciting an advantage as an inducement for action which is illegal, unethical, improper or a breach of trust. A 'Bribe' is an unearned reward or advantage which can influence someone's behaviour.
- Corruption means a dishonest abuse of power, which may involve a person acting against the interests of Arena to achieve personal gain for themselves, another person or entity. Bribery is a form of Corruption.
- Employees means directors, officers, employees, contracted staff and other employees of Arena or its related bodies corporate.
- Facilitation Payment means a form of Bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action.
- Kickback means form of negotiated bribery in which a portion of a payment made is returned in exchange for the giving of an undue advantage.
- Lobbying activities means communications with a Government representative in order to influence Government decision making, including the making or amendment of legislation, the development or amendment of a government policy or program, the awarding of a government contract or the allocation of funding, but does not include:
  - communications in response to a call for submissions; request for tender or request by Government representatives for information;
  - statements made in a public forum;
  - petitions or communications of a grassroots campaign nature in an attempt to influence a Government decision or policy.

3. Application of this Policy

This policy applies to all Employees. The Policy should be read in conjunction with other Arena policies, including the Code of Conduct, Conflicts of Interest Policy, Related Party Transactions Policy and Whistleblower Policy.

4. Prohibitions and restrictions

4.1 Bribery

Employees are not permitted to give, offer, promise, accept, request or authorise a Bribe, whether directly or indirectly.

Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another person or organisation to influence a business outcome improperly, to induce or reward improper conduct or to gain any improper commercial, contractual, regulatory or personal advantage.

For the avoidance of doubt, the prohibition on Bribery applies irrespective of whether the person sought to be influenced is in the public or private sector, and regardless of whether the provider or recipient of a Bribe is an individual person or an organisation (including Arena).

4.2 Facilitation payments and secret commissions

The making of facilitation payments, whether legal or not in a country where the recipient is located, is prohibited under this Policy. Facilitation payments are a form of Bribery in which (typically small) payments are made with the purpose of expediting or facilitating the performance by a public official of a routine governmental action. In addition, the making or acceptance of Kickbacks (by Employees personally or on behalf of Arena) is prohibited under this Policy, and must not occur.

The giving or receiving of secret commissions is also prohibited under this Policy. Secret commissions typically arise where a person or entity offers or gives a commission to an agent or representative of another person (such as a contractor of Arena) which is not disclosed by that agent or representative to their principal. Such a payment is made as an inducement to influence the conduct of the principal's business.

4.3 Gifts and hospitality

Gifts and hospitality may be received or given, subject to the provisions of Arena's Code of Conduct and the Conflicts of Interest Policy. Consideration must be given to whether the frequency or timing of gifts or hospitality may be inappropriate or create an appearance of impropriety. Where possible, Employees should discuss with their manager that they have been offered a gift or benefit before accepting it, in order to determine the appropriate action.

Where gifts/benefits are to be or have been received, then the economic value to the recipient will determine the action required. Gifts or benefits received in accordance with this clause are not considered conflicts of interest, although they will be recorded in a register maintained by the Head of Risk, Compliance and Governance and noted in the standing item on conflicts of interest included in the periodic compliance report to the Audit, Risk and Compliance Committee of the Board.

4.4 Charitable donations

Arena has established a Community Partnership Program, which allows Arena to make appropriate donations to charitable organisations with aligned purpose and values. Donations made under the program are subject to the approval and oversight of the Board and will be disclosed in Arena's annual reporting regime.

Ad hoc charitable donations must not be made, offered or provided on behalf of Arena, without prior written approval from the Managing Director. Charitable donations must not be made on the basis that a person or organisation with which Arena is proposing to deal requests that a donation be made to a particular charity before agreeing to undertake or continue a business relationship with Arena (which is a form of Bribery).

Employees may make charitable donations in their personal capacity as long as they are not used to obtain any business advantage.

4.5 Political donations

Arena does not contribute funds to any political party, candidate or organisation with political aspirations. This includes if a person or organisation with which Arena is proposing to deal requests that a political contribution be made to a particular party before agreeing to undertake or continue a business relationship with Arena (which is a form of Bribery).

Employees may voluntarily participate in the political process as an individual. However, they must not engage in actions, including making donations, that could cause someone to believe their actions are made on behalf of Arena or reflect the views or position of any member of Arena.

4.6 Lobbying and Industry Associations

Industry associations provide a platform for the sharing of best practice in the interests of the industry and those with whom the industry works, which may lead to better outcomes on policy, practice and standards for the sector.

It is Arena's policy to be a member of an industry association only where that association:

- gives Arena access to industry insights, expertise or information that may improve operational performance; or
- enhances Arena's ability to advocate for sound and/or commercially beneficial policy outcomes.

Arena may only take our or renew membership of an industry association where such membership has been approved by the Managing Director.

Arena may engage in lawful Lobbying activity (which may occur in conjunction with industry participants or industry associations) where it is considered in the best

interests of Arena's stakeholders (including capital providers or tenant partners). No Lobbying activity can occur without prior approval from the Managing Director.

4.7 Accounting, books and records

Arena is required to maintain internal financial recording and accounting systems and procedures to make and keep books and records which accurately and fairly reflect, in reasonable detail, the parties, the payment arrangements and the purpose of all transactions and disposal of assets.

No undisclosed or unrecorded fund or account may be established for any purpose.

5. Reporting

An Employee who becomes aware or suspects the Policy has been breached by any person acting for or representing Arena should report the known or suspected breach to the Head of Risk, Compliance and Governance. Reports may be made confidentially and on an anonymous basis in accordance with Arena's Whistleblower Policy. Retribution against a person for reporting or supplying information about a breach or policy concern will not be tolerated.

Where appropriate, and subject always to Arena's Whistleblower Policy, material incidents of bribery or corruption will be reported to the Board.

6. Consequences of non-compliance

Failure to comply with this Policy may result in significant adverse impact to Arena's operations and reputation.

An Employee who breaches this Policy or fails to report known or suspected breaches of the Policy will face disciplinary action, which may result in dismissal for misconduct.

Bribery and other types of improper payments prohibited by this Policy are prohibited under the laws of the jurisdictions in which Arena operates. Involvement in bribery or corruption may incur serious criminal and civil penalties for any Employees involved and/or Arena. As required, Arena will refer offences to regulators or law enforcement agencies for further investigation and action.

7. Training

Arena provides training to all Employees on this policy, Arena's prohibition on bribery and corruption and how to recognise potential bribery, corruption and other conduct prohibited by this policy.

8. Review of Policy

Arena will review this policy annually to assess that it is operating effectively and to consider whether any changes are required to the policy.

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