

CLARK Property Partners Pty Ltd

ABN 68 641 858 737

t/as CLARK Commercial | CLARK Prestige | and associated divisions

CPP-POL-04

Corporate Governance Policy

Version 1.1 | June 2026 | Approved: Stephen Clark, Managing Director

Defined Term

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names is referred to throughout this Policy as "**CPP**". All references to CPP in this document apply to the entire organisation including all trading divisions, business names, personnel, directors, contractors and agents acting on behalf of CPP.

01 Policy Statement

1. Policy Statement

CLARK Property Partners Pty Ltd (ABN 68 641 858 737) trading as CLARK Commercial, CLARK Prestige, and associated divisions and business names ("CPP") is committed to the highest standards of corporate governance across all divisions and business activities. Sound governance — built on transparency, accountability, legal compliance and ethical conduct — is the foundation on which CPP's reputation and client relationships are built.

02 Transparency & Reporting

2. Transparency & Reporting

CPP commits to open, accurate and timely reporting across all aspects of its service delivery:

- Monthly financial reporting to property management clients delivered by the first business day of each month — including all income, outgoings, arrears, distributions and marketing spend
- No undisclosed referral fees, rebates or commissions from contractors or service providers engaged at managed assets — all such arrangements disclosed in writing to the relevant asset owner
- Immediate written disclosure to clients of any material issue, risk or concern — without waiting for the next scheduled report
- Full transparency in the marketing and management of all sales and leasing transactions across commercial and prestige divisions

03 Conflicts of Interest

3. Conflicts of Interest

CPP maintains a rigorous approach to identifying and managing conflicts of interest across all divisions:

- All actual or potential conflicts of interest must be disclosed in writing using the Conflicts of Interest form to the Managing Director and to the relevant client promptly upon identification
- No CPP personnel may derive personal benefit from any contractor, supplier, tenant or client relationship without prior written disclosure and approval
- Contractor procurement processes include mandatory conflict of interest declarations
- Related-party transactions are disclosed to clients and conducted on arm's length terms
- CPP personnel engaged in sales and leasing transactions must disclose any relationship with counterparties prior to acting

04 Legal & Regulatory Compliance

4. Legal & Regulatory Compliance

CPP will at all times comply with all applicable laws and regulations including:

- Property Law Act 2023 (Qld), Retail Shop Leases Act 1994 (Qld) and Property Occupations Act 2014 (Qld)
- Work Health and Safety Act 2011 (Qld) and WHS Regulations 2011 (Qld)
- Environmental Protection Act 1994 (Qld)
- Privacy Act 1988 (Cth) and the Australian Privacy Principles
- Modern Slavery Act 2018 (Cth)
- Anti-corruption legislation including the Criminal Code Act 1995 (Cth)
- Fair Work Act 2009 (Cth) and applicable awards and enterprise agreements

- Building Fire Safety Regulation 2008 (Qld)
- Disability Discrimination Act 1992 (Cth) and accessibility standards
- Australian Consumer Law and applicable consumer protection legislation

05

Record Keeping

5. Record Keeping

CPP maintains accurate, complete and secure business records across all divisions:

- All client files, lease documents, financial records and correspondence maintained in CPP's property management and financial systems
- Records retained for the minimum periods required by applicable legislation — and no less than 7 years for financial and property management records
- No falsification, alteration or destruction of business records
- Secure disposal of records containing personal or confidential information

06

Policy Review & Accountability

6. Policy Review & Accountability

Stephen Clark, Managing Director, holds ultimate accountability for CPP's corporate governance standards. This Policy is reviewed annually or upon material legislative change.

Stephen Clark

Managing Director

CLARK Property Partners Pty Ltd

June 2026

Version 1.1

Review Due: June 2027

Policy Owner: Managing Director, CPP