

# CLARK Property Partners Pty Ltd

ABN 68 641 858 737

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

CPP-POL-06

## Anti-Corruption & Ethical Conduct Policy

Version 1.2 | 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") maintains an absolute zero-tolerance approach to bribery, corruption, fraud and unethical business conduct in all its forms. This applies to all CPP personnel, directors, contractors and any person acting on CPP's behalf — across commercial sales and leasing, prestige residential, hotels and hospitality, property management and marketing.

**02 Prohibited Conduct**

## 2. Prohibited Conduct

The following conduct is strictly prohibited and will result in immediate disciplinary action, termination and referral to relevant authorities:

- Offering, promising, giving, requesting or accepting any bribe, kickback, improper payment or thing of value — directly or indirectly — in connection with any CPP business activity or managed asset
- Making or accepting any facilitation payment to any government official, public servant or other individual
- Falsifying, altering or destroying any business record, document or financial record
- Misappropriating client, tenant, trust or company funds
- Engaging in fraud, deception or dishonesty in dealings with clients, tenants, contractors, regulators or any other party
- Using confidential client or tenant information for personal benefit or commercial advantage
- Entering into any undisclosed referral fee, rebate or commission arrangement with contractors or service providers engaged at managed assets

**03 Gifts & Hospitality**

## 3. Gifts & Hospitality

CPP acknowledges that gifts and hospitality are a normal part of business relationships but must never be used to influence decisions:

- CPP personnel may accept token gifts of nominal value (under \$100) provided they are disclosed to the Managing Director
- Gifts or hospitality of material value must be declined or, if unavoidable, declared in writing within 5 business days
- CPP personnel must never offer gifts or hospitality to clients, tenants, contractors or regulators that could be perceived as an attempt to influence a decision
- All gifts received and given are recorded in CPP's gifts and hospitality register maintained by the Managing Director

**04 Procurement Integrity**

## 4. Procurement Integrity

CPP's procurement of contractors, suppliers and professional services must be conducted with full integrity:

- Contractor and supplier selection based on merit, capability, price and compliance — not personal relationships or improper incentives

- No undisclosed referral fees, rebates or commissions from any contractor, supplier or service provider engaged at a managed asset or in connection with a CPP transaction
- Conflict of interest declarations required from all CPP personnel involved in procurement decisions
- All significant procurement decisions documented and available for client review

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**Sales & Leasing Conduct**

## 5. Sales & Leasing Conduct

CPP personnel engaged in commercial sales, commercial and retail leasing, and prestige residential transactions must:

- Comply fully with all obligations under the Property Occupations Act 2014 (Qld) and applicable real estate legislation
- Disclose all material facts relevant to any transaction to all parties
- Never misrepresent the characteristics, value or prospects of any property
- Never act in a transaction where an undisclosed conflict of interest exists
- Ensure all commissions, fees and charges are disclosed to clients in writing prior to engagement

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**Reporting Concerns**

## 6. Reporting Concerns

CPP encourages all personnel and stakeholders to report any suspected breach of this Policy. Reports should be directed to Stephen Clark, Managing Director. CPP will not tolerate retaliation against any person making a good-faith report. Confirmed breaches will be disclosed to relevant clients and, where required, to relevant authorities.

**Stephen Clark**

Managing Director

CLARK Property Partners Pty Ltd

June 2026

**Version 1.2**

Review Due: June 2027

Policy Owner: Managing Director, CPP