

OUE REIT – SUMMARY OF ANTI-BRIBERY & CORRUPTION (“ABC”) PROVISIONS IN THE CODE OF BUSINESS CONDUCT AND ETHICS

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1. Introduction

As a member of the international financial community, Singapore is committed to global anti-corruption efforts. In line with this commitment, Singapore has decided to ratify the United Nations Convention Against Corruption (UNCAC).

Domestically, the country’s zero-tolerance stance towards corruption is anchored in the **Prevention of Corruption Act (PCA)**, which empowers the **Corrupt Practices Investigation Bureau (CPIB)** to investigate and prosecute corruption offences across both the public and private sectors.

OUE REIT adopts a zero-tolerance approach against all forms of bribery and corruption. Any employee found guilty of misconduct or intentionally violating the Code may face disciplinary action, including termination without notice or compensation.

This summary sets out the core principles set out in the Code and outlines the controls required to ensure strict compliance with all applicable laws, regulations, rules, and government policies that prohibit bribery and corruption activities.

Scope

This summary is to be read in conjunction with the comprehensive ethics and governance policies outlined in our Code of Business Conduct and Ethics (the “Code”), which clearly defines our expectations for business practices.

Our Code applies to all employees regardless of level including whether permanent or contract, senior management. We are dedicated to conducting our business fairly and ethically, firmly prohibiting any form of favouritism. This includes rejecting any requests for favours, whether directly or indirectly, from clients, contractors, business associates and any other person involved in our value chain.

This summary covers:

- Corruption & Bribery
- Facilitation payments & Kickbacks
- Gifts and entertainment
- Political contributions
- Charitable contributions

2. Definitions

2.1 Corruption & Bribery

According to the CPIB, corruption is broadly defined as a bribe offered in return for a favour.

Bribery includes receiving, offering, promising, authorising, accepting or providing anything of value directly or indirectly to or from any third parties such as customers, vendors and suppliers, business partners, or other persons to improperly obtain unfair advantage. Employees must not engage in any form of bribery when soliciting and conducting business.

The bribe can be in the form of monetary or non-monetary nature, i.e., anything of value. This includes:

- Money, gifts, loans, fees, rewards, commissions or other property of any description
- Any office, employment or contract
- Any payment, release, discharge or liquidation of any loan, obligation or other liability
- Any other service, favour or advantage of any description
- Any offer, undertaking or promise of any gratification

2.1.1 Facilitation payments & Kickbacks

Facilitation payments are made by a business to a public or government official as an incentive to expedite or facilitate legal or governmental proceedings.

A kickback is a form of payment made to a person of influence within an organisation, in return for securing some kind of reward for the person making the payment.

All employees are strictly prohibited from accepting and making any form of facilitation payments and kickbacks when conducting business.

2.2 Gifts and Entertainment

Employees may not directly or indirectly offer, solicit or accept any favours from its customers, contractors and business associates in exchange for the following:

- Granting more favourable terms and conditions of contract than warranted;
- Giving discounts on transactions; and/or
- Not taking any action when the situation warrants some action. Corporate gifts offered or presented are not considered bribes.

2.3 Political Contributions

OUE REIT does not contribute to political campaigns, political organisations, lobbyists, or lobbying organisations and trade associations. Our commitment is communicated through our Code, which explicitly prohibits employees from making illegal payments to any local, state, or government officials or from bribing individuals while conducting business to secure personal gains from suppliers of goods and services. We consider these actions as serious violations that must be addressed to safeguard our stakeholders, the integrity of our investments, and our overall reputation

3. Roles and Responsibilities

All OUE REIT employees are responsible for understanding and complying with the Code. If employees are aware of or have reasonable grounds to suspect any actual or potential corruption or breach of the Code, the employee shall report them promptly to the Group Legal team or lodge a report in accordance with the process set out in Section 6 below.

If there are any breaches of the Code, employees may face disciplinary action such as being issued a warning or up to and including termination of their employment or contract for services. The Manager may also report violations of the Code to the appropriate supervisory, regulatory or law enforcement authorities.

4. Record-keeping

All financial records should be detailed and kept accordingly. Appropriate internal controls are also implemented to evidence the business reason for making payments to third parties. This includes the preparation of all accounts, invoices, and other documents and records relating to dealings with third parties, such as suppliers and business contacts, and maintaining them with accuracy and completeness.

All gifts and entertainment extended or received by staff is recorded and maintained in a register of gifts and entertainment by the Corporate Human Resource Department. All expenses claims and reasons relating to hospitality, gifts or expenses incurred to third parties shall be submitted.

5. Actions to take as a victim of bribery or corruption

In the event that employees are offered a bribe by a third party, are asked to make one, or becomes aware of or reasonably suspects any inappropriate activity or activity that may create an inappropriate appearance or expectation, he or she should notify the Group Ethical Officer immediately through phone, mail or via email at groupethicalofficer@oue.com.sg in accordance with the process set out in the Whistle-blowing Policy.

Concerns raised by employees in good faith will be kept confidential, with no reprisals in any form such as dismissal, disciplinary actions, or unfavourable treatment.

6. Training and Communication

All new employees are required to read the Code of Business Conduct and Ethics and acknowledge their compliance to it. On an annual basis, all employees are also required to complete the self-paced Compliance Training Programme that covers anti-bribery and anti-corruption. The programme aims to equip both new and existing employees with the knowledge of relevant rules and regulations, as well as personal responsibilities and obligations with regards to anti-bribery and corruption.

7. Review Process

This Code is subject to ongoing review, considering its suitability, adequacy and effectiveness on a periodic basis. Any improvements identified will be made as soon as possible. Internal



control systems and procedures will also be subjected to audits to provide assurance in their effectiveness in countering bribery and corruption.