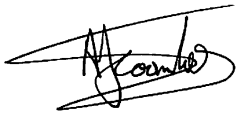


Anti-Bribery and Corruption Statement

This Statement is made by Sirius Real Estate Limited (“SRE”) and its subsidiary undertakings (“Sirius” or the “Group”).

Our purpose is to ‘Empower business and unlock potential’. This includes conducting our business in an honest and ethical manner. Sirius will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we conduct business. We take a zero-tolerance to all forms of bribery and corruption, and we are committed to maintaining proportionate, risk-based procedures designed to prevent persons associated with our business from undertaking such conduct.

This Statement sets out how the Group is proactively addressing the risk of bribery and corruption in relation to our business during the 2020 calendar year, and has been approved by the SRE Board of Directors.



Andrew Coombs
Chief Executive Officer
30 March 2020

About Sirius

Sirius is the leading operator of branded business parks providing flexible workspace to the German SME market.

SRE is incorporated in Guernsey. The Group’s business is conducted entirely in Germany, while certain management and administrative activities take place in other countries.

Our business and the associated bribery and corruption risk is described below.

Application

This Statement applies to all individuals working for or on behalf of Sirius at all levels, which includes directors, employees, contractors, volunteers, secondees, agents and intermediaries.

Scope

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which covers:

- giving or offering a bribe (including facilitation payments);

- receiving or requesting a bribe; or
- bribing a domestic or foreign public official.

Bribing any public official (domestic or foreign) does not necessarily require an intention to gain an advantage. An offence may be committed merely if the action amounts to improper performance by an official when performing his or her function.

Other forms of corruption covered by this Statement include: dealing with the proceeds of crime, engaging in fraud, extortion, embezzlement, trafficking, smuggling, deception, market manipulation and corrupt political contributions.

Risk-based approach

We recognise that Sirius is more likely to be the target of corrupt practices than a perpetrator of them. Therefore, we operate a system of internal controls which seek to detect and prevent loss to the business as a result of such activities.

Sirius maintains proportionate, risk-based procedures designed to prevent persons associated with our business from undertaking corrupt practices on its behalf. Amongst other things, these include arrangements in relation to the potential risk areas described below, which we believe are the two main sources of risk that may arise in connection with our business.

Gifts and hospitality

Sirius prohibits the offer or receipt of gifts and hospitality with the intention of:

- improperly influencing (or being influenced by) a third party to obtain or retain business or a business advantage, or
- rewarding (or being rewarded for) the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.

Sirius also prohibits the giving of gifts and hospitality of any kind to public officials, whether foreign or domestic.

Sirius permits normal and appropriate gifts and hospitality given to, or received from, commercial third parties. Our procedures provide guidance as to what is to be regarded as normal and appropriate, taking into account applicable laws and generally expected standards of behaviour.

Secret inducements and kickbacks

Sirius prohibits illicit cash payments and non-cash benefits to win new or retain existing business. Our procedures provide practical guidance for detecting and addressing such suspicious activity.

How we are dealing with risk

Awareness and training

We promote this Anti-Bribery and Corruption Statement to our employees, agents, intermediaries and principal clients and suppliers once a year. For those employees, agents and intermediaries who are more closely involved in procurement, sales and contract supervision, we give them anti-bribery and corruption training once every two years. This includes guidance on what action should be taken if faced with blackmail or extortion.

In the spirit of wider awareness and education, we seek to engage in collaborative relationships with our clients, suppliers, agents and intermediaries, where mutual concerns over bribery and corruption are openly discussed and, where necessary, addressed constructively.

Due diligence

Before we consider appointing a new agent or intermediary, we use pre-screening techniques to understand whether the third party follows practices which are incompatible with this Statement. If we are not satisfied, we will not use that agent or intermediary.

Record keeping

We keep various financial records to help us monitor compliance with this Statement.

Terms of Business

Some of our suppliers are large multinationals where we are expected to contract on their standard terms. In these instances, we still seek to apply our limited influence by promoting this Anti-Bribery and Corruption Statement to them.

For all contracts based on our terms of business, we include standard clauses on anti-bribery and corruption. Should we have a particular concern, these clauses include the right to insist on a compliance audit or to terminate the contract.

Monitoring and effectiveness review

Our anti-bribery and corruption arrangements are overseen by the Chief Executive Officer, and are kept under review by the Sustainability and Ethics Committee.

We carry out an annual review of the effectiveness of this Statement and the various measures we take to minimise the exposure of our business to bribery and corruption. We do this primarily by carrying out selective checks of financial and administrative records, and post-transaction and incident report reviews for compliance with this Statement.