



ANTI-CORRUPTION POLICY SUMMARY

Introduction

Irish Residential Properties REIT plc (“**IRES**”) and its subsidiaries from time to time (excluding owners’ management companies) (together, the “**Group**”) are committed to operating lawfully, ethically and with integrity and have zero-tolerance for all forms of corruption, including bribery. In order to combat corruption and bribery, IRES has adopted an anti-corruption policy (the “**Policy**”) which applies to each of the Group’s directors, officers and employees and to agents, consultants and other third parties working on behalf of the Group (together, “**representatives**”).

This Policy is designed to help representatives avoid engaging in potential corrupt activities and to provide guidance for the purpose of dealing with any corruption issues that may arise in the course of a representatives activities while acting on behalf of the Group.

Corruption and Bribery

Broadly, corruption is the misuse of entrusted power for private gain. Bribery is a form of corruption and consists of, directly or indirectly, giving, offering, promising, soliciting, requesting or accepting anything of value to or from any person, in order to improperly influence any person in the performance of his or her duties. An improper influence includes paying someone to do something they already intend to do, as well as paying someone to do something they would not otherwise do.

The Irish Criminal Justice (Corruption Offences) Act 2018 (the “**2018 Act**”) prohibits corruption in both the public and the private sectors. In addition to criminalising bribery, the 2018 Act also criminalises other forms of corruption including trading in influence, facilitating corruption, creating or using false documents and intimidation.

Under the Policy, representatives must comply in full with the 2018 Act and all other applicable corruption laws and representatives are prohibited from committing corruption offences, including for the purpose of obtaining or retaining business for the Group or an advantage in the conduct of business for the Group. The Policy also prohibits receiving bribes or other corrupt payments.

Guidance on Corrupt Payments

Frequently a corrupt payment, including a bribe, is paid in cash. However, the concept of a corrupt payment covers anything of value, meaning that it is sufficient if the payment has a recognisable pecuniary value, even if not made in cash. For example, a corrupt payment may take the form of gifts, hospitality, travel and related expenses, entertainment, charitable or political contributions, employment or educational opportunities, or the disclosure or non-disclosure of confidential information. Under the Policy, representatives must not make any improper payment to any person.

Corruption and Public Officials

The Policy recognises that public officials, which term includes members of government, the judiciary and other employees or members of public bodies, may have considerable power (for example the power to grant authorisations and licenses, set fees and expedite customs and tax clearances). Therefore representatives are encouraged to exercise extreme caution when dealing with a public official no matter where the relevant public official is located as enforcement authorities typically assume that anything of value given to a public official is given to influence official action or obtain an improper advantage.

Gifts, Travel, Meals and Entertainment

The Policy is not designed to prohibit normal and appropriate hospitality to or from third parties in the



normal course of business (e.g. business lunches). However, representatives are prohibited from accepting or giving gifts, travel, meals and entertainment to public officials. In certain circumstances, representatives may accept or give gifts, travel, meals and entertainment from someone who is not a public official in connection with Group related activities as long as internal procedures are followed (including adhering to monetary thresholds and approval procedures).

Political Contributions

The Policy prohibits the making of political contributions (including contributions to politicians, political parties and political organisations) by the Group and directors, officers and employees of the Group.

Facilitation Payments

Facilitation payments, also known as grease payments, are payments made to a public official to expedite or facilitate the performance of a routine task that the public official is required to perform. Facilitation payments are considered to be bribes under the 2018 Act. Consequently, the Policy prohibits facilitation payments.

Agents, Consultants and Other Third Parties.

The Group may, in some circumstances, be held responsible for bribery and corruption offences committed by a third party acting on its behalf. As such, pursuant to the Policy the Group conducts due diligence checks on third parties and ensures third parties are fully aware of the Group's zero-tolerance of corruption.

Books and Records

The Policy mandates that the Group's books, records and accounts are kept with reasonable detail and accuracy such that they fairly reflect all transactions and dispositions of assets. False, misleading or other artificial entries are prohibited in the books and records of the Group for any reason, including to conceal the purpose or nature of payments.

Training

Under the Policy, employees and officers of the Group are required to receive appropriate training on the applicable legal and regulatory environment and the requirements of the Policy, both on joining the Group and regularly thereafter. Such training focuses on ensuring that each director, officer and employee is suitably equipped to deal with any corruption issues that may arise in relation to his or her activities on behalf of the Group.

Reporting

If a representative suspects that any Group director, officer or employee or third party acting on behalf of the Group may have engaged in conduct inconsistent with the Policy, they are encouraged to report such activity to the Group. No person will ever be penalised by the Group for making a good faith report of suspected misconduct. In order to ensure that the reporting of any possible breaches of the Policy is facilitated, the Group has adopted a Whistleblower Policy.

Sanctions

Failure to comply with the Policy may lead to disciplinary proceedings up to and including termination of employment. Violations of anti-corruption laws (including the 2018 Act) could also lead to enforcement actions, reputational damage and criminal penalties against both the Group and the individuals involved.

Monitoring and Review

The Group retains accurate, transparent, fair and accessible records of due diligence, training, and



incident reports relating to compliance with the Policy.

The Policy is reviewed annually by the Company's board of directors.