

Policy

**ANTI BRIBERY AND
CORRUPTION POLICY**

Version 3

Group Anti-Bribery and Corruption Policy Statement.

The Bendigo and Adelaide Bank Limited and its controlled entities (“the Group”), as defined by the Group Definition, is committed to strong standards of integrity, ethics, and conduct.

Not engaging in bribery and corruption and complying with relevant Anti-Bribery and Corruption (ABC) legislation is central to this commitment. Effective management of the risk of bribery and corruption is therefore fundamental to the *Group’s* purpose and the well-being of our customers and communities.

The Anti-Bribery and Corruption Policy (AB&C) is approved by the Board Risk Committee, and the Group Head of Financial Crime Risk is nominated as the Group Anti Bribery & Corruption Officer.

This Policy applies to the Group, its directors (executive and non-executive), employees, third party suppliers and third parties acting for or on behalf of the Group. The policy covers any activity or behaviour undertaken during the course or in connection with, employment or acting on behalf of the Group, regardless of the geographical location in which that activity or behaviour occurs.

The Group will undertake regular assessments to identify the bribery and corruption risks that the Group reasonably faces, and also implement appropriate systems, controls, processes, and procedures to mitigate and manage these risks, as identified through the risk assessment and required by this Policy.

BEN’s AB&C policy includes the following key principles:

- The Group must not give, offer, authorise, accept, receive, or request a bribe and must not engage in corruption. It is irrelevant whether the bribe is accepted or ultimately paid.
- The Group must not offer or make a *facilitation payment* of any kind, regardless of the provisions of applicable law.
- The Group must have systems and controls in place to manage the risk of bribery and corruption in its interactions with public officials (domestic or foreign)
- The Group must not engage in improper accounting or concealment of complete and accurate financial activity. The *Group* has an anonymous channel for bribery and corruption concerns to be raised
- The Group must comply with relevant ABC legislation that applies to it

Based on the principles above, the AB&C Policy imposes the below requirements, to ensure compliance with applicable AB&C legislation with respect to the below (including but not limited to)

- Suppliers and Third Parties
- Gift and Entertainment
- Political Donations
- Transparency and Record keeping
- Marketing and Sponsorships
- Conflict of Interest
- Employment practices
- Training and Awareness

Compliance and Disciplinary Action

Non-compliance with this Policy will be treated seriously and, where applicable, can be subject to disciplinary action including the potential termination of employment.