

POLICY: ANTI-BRIBERY & CORRUPTION

Objective

Suncorp is committed to high standards of ethical behaviour and we expect our people to always behave in a manner that is consistent with our values and code of conduct. We recognise that behaviours that lead to Bribery and Corruption have an adverse effect on customers, shareholders, and communities, wherever they occur. Suncorp requires compliance with all Anti-Bribery and Corruption laws in all markets and jurisdictions in which it operates or conducts transactions.

Application

This Policy applies to Suncorp and its Employees, Officers and External Workers.

In addition, where Suncorp relies on a Third Party to manage Bribery and Corruption risk on our behalf, Suncorp must ensure that the Third Party complies with the requirements of this Policy.

Policy Statements

1. Suncorp must implement and ensure that Functions maintain an Anti-Bribery and Corruption Program

Functions are required to understand, manage, and take appropriate steps to prevent their exposure to Bribery and Corruption by:

- identifying Bribery and Corruption risk (including Facilitation Payments) throughout their business operations including activities undertaken by Third Parties on their behalf; and
- implementing controls to prevent, detect, respond, monitor, and review Bribery and Corruption risks.

2. Suncorp must maintain Bribery and Corruption awareness training

Suncorp requires all Employees, Officers and External Workers to complete timely and suitable Bribery and Corruption awareness training as part of the compliance induction training program. Suncorp requires refresher training to be completed on an annual basis.

3. Suncorp must conduct appropriate due diligence on its Third Parties

Suncorp must know who it is doing business with and who is conducting business on its behalf. Suncorp must undertake appropriate due diligence prior to engaging Third Parties, making donations, entering business relationships with, or acquiring other entities. Suncorp must ensure that all gifts and entertainment, payments to Third Parties or payments for other goods and services are proportionate, appropriate and in line with community expectations and recorded in line with the Conflict of Interest Policy where applicable.

Role Accountabilities and Responsibilities

Board

- Accountable for:
 - Setting Risk Appetite for Bribery and Corruption; and
 - Overseeing the effectiveness of Suncorp's Anti-Bribery and Corruption Risk.

Group CEO

- Accountable for:
 - Oversight of risk and compliance management and control environment to maintain risk profile within the defined Risk Appetite Statement;
 - Escalating to the Board and briefing the Board, on material risk and compliance issues;
 - Leading risk culture and providing feedback, recommendations or insights to the Board and management as appropriate; and
 - Approving and overseeing the risk management framework, regulatory compliance and controls, and associated policies to manage those risks.

Group Chief Risk Officer

- Accountable for:
 - Developing, implementing, and maintaining Anti bribery and corruption Policies, Programs and Standards; and
 - designing, implementing, and monitoring Anti bribery and corruption operational controls, risks and compliance with Policies, Programs and Standards within the remit of the Risk function

Group General Counsel

- Accountable for:
 - Investigating all suspected and alleged Internal Fraud, including Bribery and Corruption in accordance with this Policy and supporting Frameworks, Standards and Guidelines; and
 - Referring financial crime (Internal Fraud including Bribery and Corruption) matters to law enforcement agencies where evidence of illegality is identified.

Function CEO or equivalent

- Accountable for:
 - Identifying and reporting to Group Internal Fraud any suspicious activity related to Bribery and Corruption within their respective Function.
 - CEO Banking & Wealth is specifically accountable for:
 - implementing the Anti-Bribery and Corruption Policy, Programs and Standards to effectively manage Anti-Bribery and Corruption risks within the remit of the Banking function; and
 - designing, implementing and monitoring Anti-Bribery and Corruption operational controls, risks and compliance with Anti-Bribery and Corruption Policy, Programs and Standards within the remit of the Banking function.
 - Chief Information Officer is specifically accountable for:

- implementing Anti-Bribery and Corruption Policy, Programs and Standards and procedures within the remit of the Technology & Transformation function in accordance with business requirements to enable source data to be transferred to the Banking function systems.
- Responsible for:
- Key Bribery and Corruption risks are identified and mitigated with appropriate Anti-Bribery and Corruption controls (including risk assessments);
 - Bribery and Corruption risks and control activities are documented in a Fraud Control Plan (which includes Bribery and Corruption);
 - All Employees, Officers and External Workers complete on-boarding and ongoing compliance training programs;
 - Where there is reliance on Third Parties, the risk of Third Party Bribery and Corruption is minimised with appropriate safeguards and effective monitoring and control management;
 - Bribery and Corruption matters are referred to law enforcement agencies by Group Internal Fraud, where evidence of illegality is identified; and
 - Timely remedial action is taken, which may include regulatory notification, loss recovery and control environment improvement.

Financial Crime (Chief Risk Office Banking & Wealth)

- Responsible for:
- Developing, implementing, and maintaining the Anti-Bribery and Corruption Policy and risk management frameworks;
 - Designing, implementing, and monitoring Anti-Bribery and Corruption control and compliance monitoring activities;
 - Promoting a culture that manages Bribery and Corruption risk through Frameworks, Standards, guidance , recommendations and support that reinforces appropriate risk management;
 - Reporting confirmed cases of Bribery and Corruption to the Board Risk Committee;
 - Providing independent challenge and oversight to assist Functions to ensure they achieve their Bribery and Corruption control objectives in a responsible and sustainable way; and
 - Monitoring the effectiveness of Suncorp's Anti-Bribery & Corruption Policy.

Group Internal Fraud

- Responsible for:
- Investigating all suspected and alleged cases of Bribery and Corruption in accordance with established operational risk and Incident Management Standards and Internal Fraud Investigation procedures;
 - Reporting confirmed Bribery and Corruption incidents in IRIIS in line with Incident Management Standard;
 - Providing prevention, detection and response expertise or advice to Functions as required;
 - Referring Bribery and Corruption matters to law enforcement agencies where evidence of illegality is identified and notifying the respective Function CEO or equivalent of Bribery and Corruption matters that have been referred; and
 - Managing and maintaining the Group's mandatory compliance Internal Fraud awareness training (which includes Bribery and Corruption).

Employees, Officers and External Workers

- Responsible for:
 - Immediately reporting suspected or alleged Bribery and Corruption to their Leader, Group Internal Fraud, or via Suncorp's Whistleblower service;
 - Complying with this Policy and must not:
 - offer, promise, give, accept or solicit any bribe (including Facilitation Payments) in any form;
 - engage in any form of Corruption, no matter the beneficiary.
 - Maintaining knowledge and understanding of, and always acting in accordance with Suncorp's Code of Conduct, Group Policies, relevant controls, procedures, processes, and Suncorp values; and
 - Completing mandatory compliance Internal Fraud awareness training (which includes Bribery and Corruption) on an annual basis¹.

Policy Exemptions

No exemptions apply to this Policy. Country level policies should only be developed where there are local legal or regulatory requirements to do so.

Policy Breaches

All Policy breaches must be recorded in IRIS in accordance with the Incident Management Standard and Breach Management Standard, with the Policy Owner notified. Non-compliance with this Policy may result in disciplinary action (including termination of employment).

To the extent that this Policy imposes obligations on Suncorp, it does not form a contractual term, condition or representation.

Key Terms

Unless otherwise defined in this Policy, commonly used terms and phrases are defined within the [Standard Definitions Document](#).

Anti-Bribery and Corruption Program	Activities Suncorp undertakes to mitigate Bribery and Corruption, including Policies, Standards, risk assessment, controls, training and reporting.
Bribery	Offering, promising, giving, accepting or soliciting of any undue advantage of any value (financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person (including a "Public Official") acting or refraining from acting in relation to the performance of that person's duties. <small>Note 1: Bribery is a subset of Corruption, all instances of Bribery will constitute Corruption, but not all instances of Corruption will constitute Bribery.</small>

Corruption

Dishonest activity in which an Employee, Officer or External Worker of Suncorp acts contrary to the interests of Suncorp and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation.

Note 1: While conduct must be dishonest for it to meet the definition of Corruption, the conduct does not necessarily represent a breach of the law.

External Worker

A person who is engaged to perform certain services but who is not employed by Suncorp, including but not limited to:

- Authorised Representative
- Credit Representative
- Consultant
- Contractor
- Service Provider's employees

Note 1: For the purpose of this policy, only includes those required to complete mandatory compliance Internal Fraud awareness training (which includes Bribery and Corruption)².

Facilitation payment

An illegal or unofficial payment (usually of nominal value) paid to a foreign official (including a "Public Official") for the sole or predominant purpose of expediting a minor routine action.

Third Party

Parties that are not related to Suncorp and are contracted to provide services or products to Suncorp including, without limitation:

- Information technology providers;
- Marketing agencies;
- Claims management service providers; and
- Management consultants or auditors.