

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 Contingent Workers.

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 reasonable 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 Contingent Workers to complete Internal Fraud (which includes Bribery & Corruption) awareness training as part of the compliance induction training program. Suncorp requires refresher training to be completed by all Employees 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

Employees, Officers and Contingent Workers

- Accountable for:
 - Immediately reporting suspected or alleged Bribery and Corruption to their Leader, Group Internal Fraud, or via Suncorp's Whistleblower service; and
 - Complying with this Policy and must not:
 - offer, pay, solicit or accept any bribe (including Facilitation Payments) in any form;
 - engage in any form of corruption, no matter the beneficiary.
- Responsible for:
 - 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
 - Successfully completing mandatory compliance Internal Fraud training on an annual basis.

Group CEO

- 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 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.
- Responsible for ensuring the following:
 - Key Bribery and Corruption risks are identified and mitigated with appropriate Anti-Bribery and Corruption controls (including risk assessments);
 - All Employees 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;
 - Group Internal Fraud investigate all confirmed cases of Bribery and Corruption; and
 - Timely remedial action is taken, which may include regulatory notification and control environment improvement.

Group Internal Fraud

- Group Internal Fraud is responsible for:
 - Investigating all suspected and alleged cases of Bribery and Corruption in accordance with established operational risk and security management Incident Management Standards and Internal Fraud Investigation procedures;
 - Reporting confirmed Bribery and Corruption incidents in line with the 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 Bribery and Corruption awareness training.

Chief Risk Office

- Is accountable for:
 - Developing and maintaining the Anti-Bribery and Corruption Policy and risk management frameworks; and
 - Recommending approval by the Suncorp Board of the Anti-Bribery and Corruption Policy.
- Is responsible for:
 - Supporting a culture that manages Bribery and Corruption risk through framework, standards, guidance and, 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.

Board

- Is accountable for setting Risk Appetite for Bribery and Corruption; and
- Oversees the effectiveness of Suncorp’s Anti-Bribery and Corruption Risk.

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 Suncorp’s Integrated Risk Issue and Incident System (IRIIS) in accordance with Incident 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, including its Employees, Officers and External Workers, it does not form a contractual term, condition or representation.

Key Terms

Bribery	Involves the offering, paying, soliciting or receiving of any benefit or advantage (financial or not) to a person (including a “Public Official”) with the intention to influence, in order to improperly obtain or retain business or gain another advantage.
Anti-Bribery and Corruption Program	Activities Suncorp undertakes to mitigate Bribery and Corruption, including policies, standards, risk assessment, controls, training and reporting.
Contingent Worker	External Workers who, as part of their role, are required to undertake mandatory Internal Fraud computer-based training.

Corruption

Dishonest activity in which an Employee, Officer or Contingent Worker of Suncorp acts contrary to the interests of Suncorp and abuses his/her position of trust in order to achieve a personal gain or advantage for him or herself or for another person or entity.

Facilitation payment

A payment (usually of nominal value) paid to a foreign official for the sole or predominant purpose of expediting a minor routine action.