

# POLICY: ANTI-BRIBERY & CORRUPTION

---

## Objective

Suncorp is committed to operating with 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.

Suncorp understands the regulatory, and social consequences of Bribery and Corruption and that it could have an adverse effect on customers, shareholders, and communities.

This Policy sets out Suncorp's minimum expectations towards Bribery and Corruption and ensure compliance with applicable anti-Bribery and Corruption laws across markets and jurisdictions in which it operates or conducts transactions.

## Application

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

In addition, where Suncorp relies on Third Parties to act for or on its behalf, Suncorp will ensure that these Third Parties satisfy the same or equivalent requirements of this Policy as applicable.

## Policy Statements

### 1. Suncorp has no tolerance for Bribery and Corruption including facilitation payments

Suncorp, its Employees, Officers, and External Workers must never behave in a way that is dishonest, illegal, fraudulent, corrupt or unethical, and comply with disclosure obligations imposed by law by:

- Never offering, accepting, soliciting, or paying a bribe or facilitation payment;
- Never using confidential information or abusing a position of trust for personal gain (or for the gain of others); and
- Ensuring access, use and disclosure of personal, confidential, sensitive, or privileged information is authorised and only used for work purposes.

### 2. Suncorp must implement and maintain a Bribery & Corruption Control System

Suncorp, its Functions, and Business Areas must identify, manage, and mitigate their exposure to Bribery and Corruption risks by:

- Maintaining proportionate anti-Bribery and Corruption policies and procedures;
- Monitoring and assessing the performance of the Bribery & Corruption Control System;
- Undertaking a regular enterprise-wide anti-Bribery & Corruption risk assessment and, as appropriate, relevant dynamic risk & obligation, product, project, and Third-Party risk assessments; and
- Implementing appropriate controls, procedures, processes, and systems to govern, prevent, detect and respond to Bribery and Corruption risks;

### 3. Suncorp must conduct appropriate due diligence checks on its Employees, Officers, External Workers, Third Parties, and Customers to mitigate Bribery and Corruption risks

*Employee, Officers, External Worker Due Diligence:* Suncorp, its Functions, and Business Areas must undertake appropriate due diligence screening for any Bribery and Corruptions risks on all prospective Employees, Officers, and External Workers prior to commencement of employment and subject its existing Employees to ongoing due diligence where required (e.g., high-risk roles).

*Third Parties Due Diligence:* Suncorp, its Functions, and Business Areas must know who it is doing business with and who is conducting business on its behalf. Suncorp must:

- Undertake appropriate due diligence checks for any Bribery and Corruption risks prior to engaging, entering business relationships with, or acquiring Third Parties;
- Undertake ongoing due diligence checks for any Bribery and Corruption risks on existing Third Parties to ensure any new information or relevant changes are considered and actioned where required; and
- Ensure that contracts with Third Parties contain appropriate anti-Bribery and Corruption clauses.

*Customer Due Diligence:* Suncorp, its Functions, and Business Areas must undertake appropriate due diligence screening for any Bribery and Corruption risks on Customers before onboarding including ongoing and enhanced due diligence during the customer life cycle periodically or based on relevant triggers.

#### **4. Suncorp must maintain a proportionate anti-Bribery and Corruption training program**

Suncorp, its Functions, and Business Areas must maintain an effective anti-Bribery and Corruption training program proportionate to the risks it faces and requires its Employees, Officers, and External Workers to complete the training as part of the compliance induction training program. Suncorp should ensure:

- The Board receive relevant training ensuring they have the requisite skills and knowledge to carry out their directors' duties;
- The training is proportionate and tailored to high-risk roles, Functions and Business Areas;
- Refresher training is undertaken periodically (at minimum annually) and/or as appropriate (e.g., corrective response to audit action);
- The training promotes a culture of speaking up and encourages reporting of Bribery and Corruption incidents (including any suspicion) to Group Internal Fraud or by contacting the Suncorp Whistleblower Service; and
- Periodic communication to promote and reinforce ethical behaviour and awareness of consequences for non-compliance.

#### **5. Suncorp must maintain robust systems to meet reporting and record-keeping obligations**

Suncorp, its Function, and Business Areas must maintain central registers<sup>1</sup> with accurate records of its financial and non-financial information to:

- Continuously and timely disclosure of any Bribery or Corruption incidents to relevant regulators;
- Respond quickly to law enforcement and/or regulator enquires regarding Bribery and Corruption; and
- Demonstrate the steps taken to mitigate Bribery and Corruption risks.

## **Role Accountabilities and Responsibilities**

### **Board**

— Responsible for:

- Monitoring and influencing risk culture;
- Setting Risk Appetite for Bribery and Corruption; and

---

<sup>1</sup> The required information can be maintained using central registers recording information on conflicts of interest, risk assessments, due diligence, audits, external reviews, corporate expense, donations (political/charitable), sponsorships, etc.

- Approving and overseeing the risk management framework, regulatory compliance and controls and associated policies to manage Suncorp's Bribery and Corruption risk.

## Group CEO

- Accountable for:
  - Overseeing the risk and compliance management and control environment to maintain risk profile within the defined Risk Appetite Statement;
  - Escalating to and briefing the Board, on material risk and compliance issues; and
  - Leading risk culture and providing feedback, recommendations or insights to the Board and management as appropriate.

## Group Chief Risk Officer

- Accountable for:
  - Developing and maintaining the anti-Bribery and Corruption Policies, Programs and Standards;
  - Implementing anti-Bribery and Corruption Policies, Programs and Standards to effectively manage compliance obligations that arise within Risk function; 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 Suncorp Bank is specifically accountable for:
    - Implementing the Anti-Bribery & 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 the Anti-Bribery & Corruption Policy, Programs and Standards within the remit of the Banking function.
  - Group Executive Technology & Operations is specifically accountable for:
    - Implementing Anti-Bribery & Corruption Policy, Programs and Standards and procedures within the remit of the Technology & Operations function in accordance with SML 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 & Corruption Control Plan (FCCP);
  - 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, effective monitoring, and control management, and satisfy the same or equivalent requirements of this Policy as applicable;
  - 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 Suncorp Bank)

- Responsible for:
  - Developing, implementing, and maintaining the Anti-Bribery & 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;
  - Coordinating the Fraud metrics in the SGL Risk Appetite Statement for Board approval;
  - 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 IRIS 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 & Corruption awareness training.

## 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;
- Maintaining knowledge and understanding of, and always acting in accordance with Suncorp's values and Code of Conduct, Group Policies, relevant controls, procedures, processes, and Suncorp values;
- Completing mandatory compliance with Internal Fraud & Corruption awareness training on an annual basis; and
- Complying with this Policy.

## 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.

## Key Terms

### Bribery & Corruption Control System (BCCS)

System of activities Suncorp, its Functions and Business Areas undertakes to mitigate Bribery and Corruption risks, including but not limited to Policies, Standards, Enterprise-Wide Anti-Bribery & Corruption Risk Assessment, controls, awareness & training, and reporting.

### Bribery

The 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.

Note 1: Bribery is a subset of Corruption, all instances of Bribery will constitute Corruption, but not all instances of Corruption will constitute Bribery.

### Corruption

Dishonest activity in which a person associated with an organization (e.g., director, executive, manager, employee, or contractor) acts contrary to the interests of the organization and abuses their position of trust in order to achieve personal advantage or advantage for another person or organization. This can also involve corrupt conduct by the organization, or a person purporting to act on behalf of and in the interests of the organization, in order to secure some form of improper advantage for the organization either directly or indirectly.

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 & Corruption awareness training.

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

External party with whom the organisation has, or plans to establish, some form of business relationship.

Note 1: A Third Party includes but is not limited to clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, and investors. This definition is deliberately broad and should be interpreted in line with the Bribery and Corruption risk profile of the organisation to apply to Third Parties which can reasonably expose the organisation to Bribery and Corruption risks.