

Anti-Bribery and Corruption (AB&C) Policy Statement

Acts of *bribery* or *corruption* are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances. *Bribery* and *corruption* have a corrosive, negative impact on societies and economies with profound effects for the lives and wellbeing of people and communities. Bendigo and Adelaide Bank Limited (BEN) and its controlled entities (collectively, the Group) have corporate values as per the *Code of Conduct*; include a commitment to strong standards of integrity, ethics, and conduct. As such, not engaging in *bribery* and *corruption* and complying with relevant *Anti-Bribery and Corruption (ABC)* legislation is central to this commitment.

The Group values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the Group's employees as well as others acting on behalf of the Group are key to maintaining these standards.

Effective management of the risk of *bribery* and *corruption* is therefore fundamental to the Group's purpose and wellbeing for our customers, employees, partners, and communities. A clear, transparent, and risk-based corporate policy in relation to ABC articulates this commitment into a group-wide framework to manage the risk(s) of *bribery* and *corruption*. Under the Group's risk-based framework, the Board of Directors sets the risk appetite, oversees the establishment of robust business-wide risk management policies and procedures and defines risk limits to guide risk-taking within the Group.

Group Anti-Bribery and Corruption (AB&C) Policy Objectives

The objective of the group's AB&C Policy is to set out:

- The Group's formal approach for the identification, treatment and management of the *bribery* and *corruption* risks;
- The compliance obligations and expectations within the Group associated with *bribery* and *corruption* risks;
- The roles and responsibilities of the *Three Lines of Defence* in managing the *bribery* and *corruption* risks and compliance obligations and associated compliance risks which is an important element in establishing and maintaining a strong compliance culture.

Group Anti-Bribery and Corruption (AB&C) Policy Principles

The Groups AB&C Policy sets out principles that apply to the Group and a risk management framework which identifies and seeks to mitigate the associated risks of *bribery* and *corruption* that the Group may reasonably face. Additionally, the purpose of this Policy is to clearly state the Group's position that; *bribery* and *corruption* (including facilitation payments) is expressly prohibited and will not be tolerated by the Group.

The AB&C Policy applies to Bendigo and Adelaide Bank Limited (BEN) and its controlled entities (collectively, the 'Group'), its directors (executive and non-executive), employees, *Authorised Representatives*, *Community Bank companies* *third party suppliers* and third parties acting for or on behalf of the Group. This Policy covers any activity or behaviour undertaken during the course of, or in connection with, employment or acting on behalf of the Group, regardless of the geographical location (whether foreign or domestic) in which that activity or behaviours occurs. Those parties that this Policy applies to hereafter are referred to as the "*Applicable Parties*".

The AB&C Policy is reviewed regularly by Financial Crime Risk (FCR) and Chief Compliance & Financial Crime Officer who is the Group's nominated Anti-Bribery & Corruption Officer with any changes recommended by the Group Operational Risk Committee (ORC) to be approved by the Group Board Risk Committee (BRC).

The Group will undertake regular risk assessments to identify the *bribery* and *corruption* risks that the Group may reasonably face. The Group must also implement appropriate risk-based systems, controls,

standards, processes, and procedures to mitigate and manage these risks, as identified through the risk assessment(s), and required by this AB&C Policy.

The *Group*, and Applicable Parties must be aware of and understand the *Group's Anti-Bribery and Corruption (ABC)* obligations and requirements to manage any *bribery* and *corruption* risks. *Bribery* and *corruption* are serious offences and can result in criminal and civil penalties for any person or entity involved in such offences. As such, in line with the *Group's* corporate values and commitment to strong standards of integrity, ethics, and conduct, the *Group's ABC* Principles are as follows:

- The *Group* and Applicable Parties must not provide a benefit or offer to provide a benefit to another person with the intention of improperly influencing any public officials (whether foreign or domestic) to obtain or retain business, or a business or personal advantage.
- The *Group* and Applicable Parties 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* its Applicable Parties must not offer or make a *facilitation payment* of any kind, regardless of the provisions of applicable legislation.
- 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* and Applicable Parties 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* and Applicable Parties must comply with all relevant *ABC* legislation that applies to it, along with any amendments as and when they come into effect.

The AB&C Policy imposes systems, controls, processes and procedural requirements for the below listed business categories at a minimum, to ensure compliance with applicable AB&C legislation with respect to:

- Risk Assessment
- Anonymous Concerns & Whistleblowing
- Suppliers and Third Parties
- Gifts and entertainment
- Political Exposure, Engagement and donations
- Transparency and Record Keeping
- Reporting Obligations
- Marketing and Sponsorship
- Conflict of Interest
- Employment Practices
- Training and Awareness: and
- Roles and Responsibilities within the Business

Compliance and Disciplinary Action

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

Any staff member who knowingly or recklessly breaches the Group's AB&C Policy and associated supporting standards and procedures can be subject to disciplinary action.

If required, steps will be taken to comply with any law that requires such matters to be reported to a law enforcement agency. The Group will, as required by law, cooperate with any law enforcement agency responsible for investigating or enforcing any AB&C related matters.