

## Anti-Bribery and Corruption Statement

AustralianSuper's purpose is to help members achieve their best financial position in retirement. To achieve this, we have always and will continue to act in the best financial interests of members.

AustralianSuper has a zero-tolerance approach towards Bribery (including Facilitation Payments) and Corruption.

At AustralianSuper, we are committed to:

- conducting all business in an honest and ethical manner;
- acting professionally, fairly and with integrity in all business dealings and relationships;
- not making or receiving any inappropriate promises, gifts, entertainment or excessive hospitality in order to achieve unfair advantage or benefit; and
- resisting any efforts made by others (including suppliers, customers or clients) to unfairly affect any official decision-making process in order to achieve unfair advantage or benefit.

All Employees (colleagues and contingent workers), Directors, Board Committee Members and Responsible Persons of AustralianSuper must comply with this statement.

We expect our business partners and agents to implement and enforce effective systems to counter bribery and corruption.

AustralianSuper is compliant with Anti-Bribery & Corruption legislation in locations in which the fund operates such as the Australian Criminal Code Act 1995, the UK Bribery Act 2010, the US Foreign Corrupt Practices Act 1977.

AustralianSuper does not make political donations.

## Definitions:

### Bribery

AustralianSuper defines a bribe as offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be 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 acting or refraining from acting in relation to the performance of that persons' duties. Bribery is a form of corruption.

Facilitation payments are defined as any facilitating payment or expediting payment to a foreign official, political party, or party official to expedite or to secure the performance of a routine governmental action. These payments are illegal under UK law and the laws of many other countries. Facilitation payments are a form of bribery.

### Corruption

AustralianSuper defines corruption as dishonest activity in which a colleague, director or member of a Board Committee acts contrary to the interests of AustralianSuper and abuses their position of trust in order to achieve personal advantage, or advantage on behalf of another person or AustralianSuper.

Corruption can also involve corrupt conduct by agents of AustralianSuper, or a person purporting to act on behalf of and in the interests of AustralianSuper, in order to secure some form of improper advantage for AustralianSuper, either directly or indirectly.

## How do we manage Bribery and Corruption:

AustralianSuper maintains a range of Frameworks, Policies and Standards that outline how Fraud and Corruption risk is managed and governed. All colleagues of the Fund are required to identify and escalate Bribery and Corruption risks arising in the course of their role, in accordance with these policies and frameworks. All employees are provided with regular training to ensure they are familiar with our policies and procedures.

AustralianSuper has a Code of Conduct for Employees and Directors which articulates the standards of behaviour expected of them. The **Code of Conduct Summary** provides a brief overview of the standards.

AustralianSuper's Conflicts Management Policy addresses the identification, disclosure, recording and management of conflicts. Read a summary of our **Conflicts Management**. As part of our conflicts management processes, we maintain a Relevant Interests and Relevant Duties **register** and a Gifts & Entertainment **register for** Directors, Board Committee Members and Responsible Persons. We also maintain an internal gifts, entertainment and corporate hospitality register for all employees.

AustralianSuper encourages employees and other eligible people to speak up if they witness or suspect improper conduct. The **AustralianSuper Whistleblower Policy** can be read for more information on how, and to whom, whistleblowing disclosures can be made and how AustralianSuper will support and protect whistleblowers.

Below is a list of the relevant frameworks, policies and standards that all AustralianSuper employees have access to and are required to comply with:

- *Code of Conduct Policy*
- *Fraud & Corruption Control Standard*
- *Conflict Management Policy*
- *Financial Delegations Policy*
- *Fit and Proper Policy*
- *Gifts, Entertainment and Corporate Hospitality Policy*
- *Investment Governance Framework*
- *Outsourcing Policy*
- *Information Security Policy and associated documents*
- *Performance Counselling and Discipline Policy*
- *Performance Counselling Policy (UK)*
- *Consequence Management Framework*
- *Personal Trading and Switching Policy*
- *Whistleblower Policy*