

# **EQT GROUP ANTI BRIBERY & CORRUPTION POLICY**



# Contents

<b>Statement of Policy</b>	<b>3</b>
Purpose	3
Application	3
Review	3
Policy Breaches	3
<b>What is Corruption and Bribery?</b>	<b>3</b>
<b>Key Bribery and Corruption Principles</b>	<b>3</b>
<b>Key obligations</b>	<b>4</b>
<b>Policy requirements</b>	<b>4</b>
Ethical Culture	4
Identifying and managing Bribery and Corruption risk	4
Reporting of bribery & corruption matters	5
Training and Awareness	6
<b>Accountabilities</b>	<b>6</b>
Employees	6
Business Unit Leaders	7
Enterprise Risk	7
Chief Risk Officer (CRO)	7
MARCC	7
Internal Audit	8
External Audit	8
Where to get help	8
<b>Policy Administration</b>	<b>9</b>
<b>Document Version Control History</b>	<b>10</b>



# STATEMENT OF POLICY

## PURPOSE

This policy is intended to:

- comply with all applicable anti-bribery and corruption laws
- describe the approach to prevent, detect and report actual or potential instances of bribery or corruption
- define roles & responsibilities for this policy.

The Anti-Bribery and Corruption Policy defines unacceptable behaviour and activity relating to bribery and corruption. This policy aims to ensure that bribery and corruption risks within EQT Group's businesses are properly identified, mitigated and managed. It is one of the policies supporting EQT's Code of Conduct.

## APPLICATION

This policy applies to all directors, employees, including permanent, temporary and casual appointments, contractors, subcontractors and Responsible Persons/Managers of EQT Holdings Ltd and its controlled entities, including when acting at EQT's request in operational roles or as directors for other entities.

## REVIEW

This policy will be reviewed at least every three years, or in the event of any significant change in the internal or external environment within this time.

## POLICY BREACHES

Equity Trustee takes a zero-tolerance approach to bribery and corruption. A breach of this policy must be escalated to Enterprise Risk or through the Whistleblowing process. Enterprise Risk will maintain a register of such breaches and will escalate to the Board Risk Committee as appropriate.

# WHAT IS CORRUPTION AND BRIBERY?

## CORRUPTION:

Dishonest activity in which EQT Group Personnel (including Directors) acts contrary to the interests of the entity and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself, or for another person or entity.

## BRIBERY:

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of political donations, gifts, loans, fees rewards or other advantages.

# KEY BRIBERY AND CORRUPTION PRINCIPLES

1. EQT Group has zero tolerance for bribery, corrupt or criminal activity within the organisation.
2. Responses to bribery or corruption incidents need to be objective, timely and comprehensive and may include disciplinary action up to and including dismissal and/or referral to law enforcement agencies.
3. Business Units take responsibility for bribery and corruption risks and are required to understand and reduce their bribery and corruption risks to an acceptable level.
4. Employees are required to contribute to the minimisation of bribery and corruption occurrences.



## KEY OBLIGATIONS

Under the policy, EQT Group and its directors & employees will not:

- Directly or indirectly offer, promise, give, request, or agree to receive or accept a bribe in any form (including bribes in the form of a facilitation payment, secret commission or offer of employment)
- Offer or accept, directly or indirectly, gifts, entertainment, sponsored travel, political donations or any other benefit that could improperly influence, or be perceived to improperly influence, any person in order to obtain or retain business or any advantage of any kind for Equity Trustee.
- Offer or provide anything of value to a Public Official or any member of their family in order to improperly influence, or be perceived to improperly influence, in order to obtain or retain business, or secure any improper advantage of any kind for Equity Trustee.
- Make a donation or grant as a way of improperly influencing any person in order to obtain or retain business or an improper advantage of any kind for the benefit of Equity Trustee.
- Enter into, or continue, a business relationship with third parties (for example suppliers, agents, intermediaries, joint venture partners or proposed merger and acquisition targets) without appropriate due diligence being conducted.
- Keep inaccurate books and records or keep accounts or transactions relating to dealings with third parties “off-book” to facilitate or conceal improper payments.

## POLICY REQUIREMENTS

### ETHICAL CULTURE

The key elements of EQT Group’s risk culture that contribute to an effective bribery and corruption control environment include:

- Documented policies and procedures that support the bribery and corruption control framework, including our Code of Conduct and Ethics, Whistleblower, Conflicts of Interest, Gifts and Hospitality, Securities Dealing, Anti-Money Laundering and Counter Terrorism Financing policies in addition to this policy.
- Board approved Risk Appetite Statement, which sets a strong “tone from the top” in relation to risk and compliance management.

### IDENTIFYING AND MANAGING BRIBERY AND CORRUPTION RISK

Business unit managers are responsible for assessing existing and new business activities for bribery and corruption risks. Potential bribery and corruption risks may be identified during the performance of:

- Internal and external audits;
- Risk and control self-assessments;
- Incident and complaints analysis.
- Business Units’ risk register reviews



As with other risk categories, bribery and corruption risks should be captured on the Group and Business units' risk register and linked with associated controls. It will be assessed periodically as outlined in the Group Risk and Compliance Management Framework, in terms of likelihood of occurrence and potential impact to the organisation.

The Risk Appetite Statement (RAS) describes how the EQT Group provides guidance and sets expectations in relation to how business units are to treat identified bribery and corruption risks.

Where an identified bribery and corruption risk is assessed as outside of appetite, a treatment plan must be developed, detailing the controls which are in place or will be implemented to reduce the risk to an acceptable level.

The Risk Acceptance process outlined in the Risk Management Procedures must be followed to ensure approvals and appropriate governance and oversight is maintained.

Any relevant controls may be subject to internal audit as part of the overall internal control monitoring program.

### **Control**

Bribery and corruption controls are designed to mitigate/prevent the risk of bribery and corruption and can be either preventative or detective.

**Preventative controls:** are designed to stop bribery or corrupt activity occurring.

**Detective controls:** are designed to identify a bribe or corrupt activities that may have already occurred.

Bribery & corruption controls are required to be effectively designed and implemented to ensure that they meet the intended purpose of reducing the risk of bribery or corruption occurring, or, detecting bribery or corrupt activity as soon as possible.

Business unit managers are required to implement appropriate preventative, detective controls and data analytics to support a bribery and corruption aware culture.

## **REPORTING OF BRIBERY & CORRUPTION MATTERS**

It is the responsibility of all executive and non-executive directors and all EQT Group personnel to report any suspected, attempted or actual bribery or corruption incidents, and should feel empowered to do so, without any fear of recrimination.

Any Equity Trustee's executive, director, employee and contractor who suspects bribery or corrupt activity must immediately report the matter through one of the following avenues:

Notifying their immediate line manager, the General Manager Human Resources (GM HR) or a Whistle-blower Protection Officer (WPO). The Whistleblowing Policy contains those employees designated as WPOs; or

Directly notifying a member of the Enterprise Risk team led by the Chief Risk Officer (CRO).

Notifying the Chairman of the EQT Group Board or Risk Committee.

Where applicable, staff member(s) reporting an incident will be offered protection as outlined in the EQT Group Whistleblower policy.

### **Escalation**

The EQT Holdings Board or Board Risk Committee should be informed of any material incidents of bribery or corruption, as they may be indicative of issues with the culture of the organisation.

### **Investigation**

All reported bribery and corruption matters will be investigated. The CRO will act as the coordinator and reporting point for investigations.

Under no circumstances are staff and management to conduct an investigation on their own or confront a suspect in relation to an allegation of bribery and/or corrupt conduct. Staff and management must not



take any actions that could prejudice the subsequent collection of evidence or influence potential witnesses.

The investigation process may vary according to the type and nature of the matter.

Investigations will not be disclosed or discussed with anyone other than those with a legitimate need to know.

### **Remediation**

Action should be taken as soon as possible to prevent any further occurrence or increase in loss from the bribery or corrupt activity, subject to guidance from the investigation lead (GM HR or CRO).

All agreed remediation actions resulting from the investigation should be tracked and monitored to ensure completion. Remediation actions may include such things as:

- Loss recovery.
- Insurance Claims.
- Improved or additional internal controls.
- Disciplinary actions.

### **Disciplinary Action**

Committing a bribery or corrupt act is viewed seriously by EQT Group and staff members involved will be subject to disciplinary action, which may result in dismissal and criminal prosecution. Any proposed disciplinary action will be reviewed and actioned by appropriate responsible parties at EQT Group who are separate from the investigation process.

If an employee is subject to disciplinary action, as a result of a bribery or corruption investigation, which they are dissatisfied with, the employee can request an independent review of the decision.

The employee can lodge an unfair dismissal claim with Fair Work Australia after the termination of their employment with EQT Group if he or she is still not satisfied with the outcome of disciplinary action.

It is important to note, all matters which indicate potential criminal activities will be referred to law enforcement agencies.

## **TRAINING AND AWARENESS**

Managers must ensure that all employees are aware of this policy and their responsibilities in regard to bribery and corruption identification, prevention, detection and notification.

All EQT Group personnel must be trained in bribery and corruption awareness and how to respond. Training will be provided on a periodic basis and the material is consistent with relevant laws and regulations.

## **ACCOUNTABILITIES**

### **EMPLOYEES**

It is the responsibility of all employees to:

- Perform their tasks and roles ethically, diligently and in line with Equity Trustees values.
- Be vigilant and report all suspected, attempted or actual bribery or corruption incidents. Employees reporting an incident will, as appropriate, be offered protections as outlined in the EQT Group Whistle blower policy.
- Participate in bribery and corruption awareness training as required.



## **BUSINESS UNIT LEADERS**

Business unit leaders are responsible for:

- Identifying and assessing existing and new business activities for bribery and corruption risks and including them in their risk profile.
- The design and operation of appropriate preventative and detective controls within their business units to mitigate the potential for bribery or corrupt activity.
- Promoting a bribery and corruption aware culture within their business units.
- Participate in bribery and corruption awareness training as required.
- Escalating potential or actual bribery or corruption incidents to the Chief Risk Officer.

## **ENTERPRISE RISK**

Enterprise Risk are responsible for:

- Developing and maintaining this policy.
- Oversight and challenge of bribery and corruption risks identified in the business unit risk profiles.
- Periodically reviewing and testing controls
- Developing and coordinating a training and awareness program that supports this policy.
- Assisting Business Unit Leaders in deterring, detecting and responding to bribery and corruption incidents.

## **CHIEF RISK OFFICER (CRO)**

The CRO is responsible for:

- Promoting a anti bribery and corruption aware culture within EQT Group.
- Ensuring the effective management, monitoring and implementation of this policy.
- Escalating suspected bribery or corruption incidents in line with this policy.
- Notifying regulators or law enforcement agencies where deemed necessary.

## **MARCC**

The MARCC are responsible for:

- Endorsing and overseeing the implementation of this policy
- Reviewing the bribery and corruption incidents and further take actions if required.
- Ensuring appropriate actions are developed where bribery and corruption risks are assessed as outside of Risk Appetite.
- Recommending actions to the relevant Boards in line with our RCMF and RAS.

## **BOARD RISK COMMITTEE**

The Board Risk Committee is responsible for the endorsement of this policy to the Board and monitoring any breaches or incidents relating to this policy.



## INTERNAL AUDIT

Internal Audit is responsible for providing independent assurance on a periodic basis through the execution of internal audits as scheduled in the Annual Internal Audit Plan and providing assurance to the Board and Board Committees in relation to the effectiveness of the internal control environment. As part of the periodic internal audits will:

- Identify control weaknesses that could allow bribery or corruption and make appropriate recommendations to deter such events.
- Inform the appropriate authorities within Equity Trustees of suspected wrong doings.

## EXTERNAL AUDIT

External Audit is responsible for assessing the risk of material bribery & corruption and understand the potential for it, then take that into account when designing, planning and undertaking an external audit to detect material misstatements in the entities' financial statements due to bribery & corruption activity.

## WHERE TO GET HELP

Enterprise Risk team, the Policy Library and Equity Central.





## POLICY ADMINISTRATION

Document Title	EQT Group Anti Bribery & Corruption Policy
Policy Level	Level 1
Version No.	V.1 / 2020
Policy Owner	Chief Risk Officer
Policy Administrator	Enterprise Risk
Related Policies (These must be read in conjunction with policy)	Code of Conduct & Ethics EQT Group Anti-Money Laundering & Counter Terrorism Finance Program EQT Group Conflicts of Interest Policy EQT Group Gifts and Hospitality Policy EQT Group Risk and Compliance Management Framework EQT Group Whistleblower Policy
Supporting procedures or guidelines (These must be read in conjunction with policy)	EQT Group Incident and Breach Management Policy EQT Group and ETSL Risk Appetite Statements EQT Group Risk Management Procedures EQT Group Compliance Management Procedures
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## DOCUMENT VERSION CONTROL HISTORY

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