

Objective

Suncorp Bank (the Bank) 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.

The Bank 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 the Bank'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 Bank, its Bank Leadership Team (BLT), Employees, Officers, and External Workers.

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

Policy Statements

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

Suncorp Bank, its BLT, 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 Bank must implement and maintain a Bribery & Corruption Control System

Suncorp Bank and its Business Units 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 Bank must conduct appropriate due diligence checks on its BLT, Employees, Officers, External Workers, Third Parties, and Customers to mitigate Bribery and Corruption risks

BLT, Employee, Officer, External Worker Due Diligence: Suncorp Bank and its Business Units must undertake appropriate due diligence screening for any Bribery and Corruptions risks on all prospective BLT, 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 Bank and its Business Units must know who it is doing business with and who is conducting business on its behalf. Suncorp Bank 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 Bank and its Business Units 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 Bank must maintain a proportionate anti-Bribery and Corruption training program

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

- The Norfina Limited (NL) 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 and Business Units;
- 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 ANZ Group Integrity Unit or by contacting the ANZ Group Whistleblower Service; and
- Periodic communication to promote and reinforce ethical behaviour and awareness of consequences for non-compliance.

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

Suncorp Bank and its Business Units must maintain central registers¹ 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

NL Board

- Responsible for:
 - Monitoring and influencing risk culture;
 - Setting Risk Appetite for Bribery and Corruption; and
 - Approving and overseeing the risk management framework, regulatory compliance and controls and associated policies to manage the Bank's Bribery and Corruption risk.

¹ 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.

Suncorp Bank 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 NL Board, on material risk and compliance issues; and
 - Leading risk culture and providing feedback, recommendations or insights to the NL Board and management as appropriate.
 - Implementing the Anti-Bribery & Corruption Policy, Programs and Standards to effectively manage anti- Bribery and Corruption risks within the Bank;
 - Designing, implementing and monitoring anti-Bribery and Corruption operational controls, risks and compliance with the Anti-Bribery & Corruption Policy, Programs and Standards within the Bank; and
 - Identifying and reporting to ANZ Group Integrity Unit any suspicious activity related to Bribery and Corruption within the Bank.
- 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 BLT, 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 ANZ Group Integrity Unit, where evidence of illegality is identified; and
 - Timely remedial action is taken, which may include regulatory notification, loss recovery and control environment improvement.

Suncorp Bank CRO

- 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.

ANZ Group Integrity Unit

- 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.
- 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 Suncorp Bank and its Business Units as required;
 - Referring Bribery and Corruption matters to law enforcement agencies where evidence of illegality is identified and notifying the Bank CEO or equivalent of Bribery and Corruption matters that have been referred; and
 - Managing and maintaining the Bank’s mandatory compliance Internal Fraud & Corruption awareness training.

Financial Crime 2LOD (Fraud & Corruption)

- 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 NL Board Risk Committee;
 - Coordinating the Fraud metrics in the Bank Risk Appetite Statement for NL Board approval;
 - Providing independent challenge and oversight to assist the Bank to ensure they achieve their Bribery and Corruption control objectives in a responsible and sustainable way; and
 - Monitoring the effectiveness of Suncorp Bank’s Anti-Bribery & Corruption Policy.

BLT, Employees, Officers and External Workers

- Responsible for:
 - Immediately reporting suspected or alleged Bribery and Corruption to their Leader, ANZ Group Integrity Unit, or via ANZ Group Whistleblower Service;
 - Maintaining knowledge and understanding of, and always acting in accordance with our values and code of conduct, policies, relevant controls, procedures, processes, and values;
 - Completing mandatory compliance with Internal Fraud & Corruption awareness training on an annual basis²; and
 - Complying with this Policy.

² For specific Fraud & Corruption related training requirements, refer to ‘Compliance (sharepoint.com)’

Policy Exemptions

No exemptions apply to this Policy.

Policy Breaches

All Policy breaches must be managed in accordance with the Incident Management Standard and the Breach Assessment and Reporting Standard with the Policy Owner notified. A breach of this Policy may result in disciplinary action (including termination of employment or engagement), financial loss, and/or legal or regulatory action.

Key Terms

Unless otherwise defined in this Policy, commonly used COI terms and phrases are defined in the COI glossary in Collibra. General Policy definitions and terms can also be found in Collibra.

Bribery & Corruption Control System (BCCS)	<p>System of activities Suncorp Bank and its Business Units 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.</p> <p>Note 1: The Bribery & Corruption Control System (BCCS) and the Fraud Control System (FCS) are demonstrated in the Fraud & Corruption Control System (FCCS)/Plan (FCCP).</p>
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Bribery	<p>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.</p> <p>Note 1: Bribery is a subset of Corruption, all instances of Bribery will constitute Corruption, but not all instances of Corruption will constitute Bribery.</p>
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Corruption	<p>Dishonest activity in which a person associated with an organisation (e.g., director, executive, manager, employee or contractor) acts contrary to the interests of the organisation and abuses their position of trust in order to achieve personal advantage or advantage for another person or organisation. This can also involve corrupt conduct by the organisation, or a person purporting to act on behalf of and in the interests of the organisation, in order to secure some form of improper advantage for the organisation either directly or indirectly.</p> <p>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.</p>
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External Worker	<p>A person who is engaged to perform certain services but who is not employed by Suncorp Bank, including but not limited to:</p> <ul style="list-style-type: none">• Authorised Representative• Credit Representative• Consultant• Contractor• Service Provider's employees <p>Note 1: For the purpose of this policy, only includes those required to complete mandatory compliance Internal Fraud & Corruption awareness training³.</p>
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³ For specific cohorts and associated mandatory compliance training, refer to 'External Workforce Allocation Guidelines'

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.
