

Anti-Bribery & Corruption Policy

Owner	Chief Risk Officer (CRO)
Approver	The combined Risk and Compliance Committee of the AMP Limited Board and the AMP Bank Limited Board
Manager	Head of Financial Crime Compliance (FCC)
Target Audience	All AMP employees; officers; directors; contractors, including temporary agency staff; aligned advisers of AMP; and any person that performs services for or on behalf of the Group.
Effective Date	1/03/2023
Next Approval Date	30/11/2024
Contact	Financial_Crime_Compliance@amp.com.au

1. Purpose

The purpose of the Anti-Bribery and Corruption (ABC) Policy (Policy) is to outline the scope and principles that define AMP's approach to identify, manage and mitigate bribery and corruption and comply with relevant legislation in all jurisdictions in which it operates and/or has an active registration or licence. AMP has zero tolerance for bribery and corruption by any director; employee; contractor, including temporary agency staff; aligned adviser of AMP; and any person that performs services for or on behalf of the AMP Group (AMP).

This Policy outlines the actions and roles required to:

- minimise AMP's exposure to bribery and corruption risk;
- comply with legislative requirements in relation to the prevention of bribery and corruption; and
- support a robust culture of integrity at AMP.

1.1 Policy Principles

The following key principles govern AMP approach to ABC:

- AMP has no tolerance for acts of bribery and corruption;
- AMP complies with Australian ABC legislation as well as the respective ABC legislation of jurisdictions in which AMP operates, is registered in, or in which it holds a licence;
 - Prominent global laws, that have an extraterritorial reach and are applicable to the activities of AMP include, but are not limited to:
 - *Division 70, 141 and 142 of the Criminal Code Act 1995 (Cth);*
 - *Bribery Act 2010 (UK); and*
 - *Foreign Corrupt Practices Act of 1977 (U.S.).*
- ABC legislation in jurisdictions where AMP operates, criminalises any bribery of foreign and Australian public officials, as well as private sector bribery¹.
- The legislation does not prescribe specific measures an organisation needs to implement to prevent bribery and corruption. Rather, risk-based measures are recommended to be put in place.
- AMP prohibits the offering or making of facilitation payments², regardless of the provisions of applicable law.
- AMP implements a system of internal controls in place which are designed to prevent bribery and corruption and are proportionate to the bribery and corruption risks that AMP may reasonably face.

All AMP employees; officers; directors; contractors, including temporary agency staff; aligned advisers of AMP; and any person that performs services for or on behalf of the Group, must:

- Act professionally with honesty and integrity in accordance with the [AMP Code of Conduct](#);
- Not offer, provide, authorise, request or receive a bribe or anything which may be viewed as a bribe (including any secret commission) either directly or indirectly or otherwise through any third party, or perform their functions improperly in anticipation or in consequence of a bribe, regardless of whether or not a benefit is given or received by another person, including Public Officials, and regardless of the value of the benefit;
- Not act in a manner that could be perceived to be an abuse of their position in order to achieve some personal or corporate gain, including winning or retaining business, and/or provide an advantage or disadvantage to another person or entity; and
- Not intentionally alter, destroy, conceal or falsify any record to facilitate, conceal or disguise bribery or corruption.

¹ The act of bribery involving employees or representatives of commercial organisations and not involving public officials.

² A minor payment to an individual government official or employee to expedite or secure the performance of a routine government action (e.g., processing papers, issuing permits and other actions that the official is already bound to perform).

1.2 Policy Requirements

Requirements	Details
ABC obligation management	ABC obligations are aligned to the Compliance Risk Management Framework, including relevant assurance activities.
Risk assessment	AMP business units (BUs) must identify, assess and manage the bribery and corruption related risk posed by its business activities, employees, contractors, customers (and their connected parties); counterparties, representatives, authorised representatives, vendors and other third parties; by the products and services it offers; and in the geographic locations in which it operates.
Facilitation payments & Political expenditure	The offering or making of facilitation payments are not permitted regardless of the provisions of applicable law. This includes not permitting political expenditure ³ and political donations on behalf of any AMP entity. For more information on Political Affairs, please refer to the Global Expense Policy and the Government Affairs Policy on the AMP Hub .
ABC key measures	<p>AMP implements the following ABC risk-based mitigation measures to manage AMP’s risks:</p> <ul style="list-style-type: none"> • Communication and training: ensures that employees and associated person(s) are aware of and understand the ABC requirements at AMP. This includes the completion of mandatory training on managing bribery and corruption related risks. • Confidential reporting and investigation are mechanisms for reporting suspected or known bribery and/or corruption incidents and ABC risk management and compliance failures. Reporting and investigation includes making reports anonymously through whistleblowing channels (refer to the Whistleblowing Policy for more information) and the investigation of internal bribery and corruption. • Regular monitoring and review ensures compliance with the ABC requirements in accordance with the risk management frameworks (i.e., BU risk assessments) and the three lines accountabilities.
ABC Controls	<p>AMP implements the following internal controls in order for relevant relationship owners, BUs and support functions to identify, manage, mitigate and keep records, proportionate to the ABC risk that AMP may reasonably face:</p> <ul style="list-style-type: none"> • Perform risk-based due diligence processes for vendors, counterparties and other third parties, including specific ABC clauses and supplier codes of practice in our agreements. • Maintain and review the gifts & benefits register, ensuring alignment with the Gifts and Benefits Policy. • Implement and ensure appropriate employment practices (including employee due diligence). • Oversee charitable contributions and sponsorships. Any charitable giving and/or sponsorships conducted directly require approval from the relevant BU head. • Perform pre-acquisition and post-acquisition due diligence processes for mergers/acquisitions and joint ventures. This includes considering the bribery and corruption risk while reviewing financial records, major contracts, jurisdiction risk and the controls environment as part of the approval process. • Ensure appropriate governance over expenses and records.
Record Retention	All relevant correspondence, documentation and records relating to ABC related obligations, policies, standards, alerts and investigations are maintained in accordance with the Record Retention Policy .

³ Expenditure relating to political parties, individuals, organisations, lobby groups or candidates for office, including political donations that may pose specific Bribery and Corruption risk. (i.e., the actual or perceived purpose is to improperly influence a Public Official).

2. Key Definitions

Term	Definition
Associated Person	Any officer, employee, aligned adviser (Authorised Representative), temporary agency staff, agent, contractor, subsidiary or controlled entity of the AMP Group, or a person that otherwise performs services for or on behalf of the AMP Group.
Bribe	Financial or other advantage or benefit where the purpose is to improperly obtain or retain business or an advantage or to influence a person.
Bribery	The offering, promising, providing, authorising, requesting or receiving of a bribe.
Corruption	Misuse of a person's position for improper gain. Any dishonest activity in which an individual abuses their position and/or trust in order to achieve some improper gain, and/or provide an advantage or disadvantage to another person or entity.
Financial or other advantage	Financial or other advantage can include money or any offer, promise or gift of something of value or advantage, including non-tangible items.
Public Official	A public official includes: a) an officer or employee of a local, state, federal or any other level of Government Department or agency; any local, state or federal Government owned instrumentalities such as a State-Owned Enterprise (SOE); or a public international organisation (e.g., the United Nations); b) persons who hold or perform the duties of an appointment, office or position under a law of a country or pursuant to local custom or convention; c) legislative and judicial office holders, military appointees, or authorised intermediaries of officials; or d) candidates standing or nominated to be a public official.

3. Ownership and Management

The ABC Policy documents the principles and requirements that staff are required to meet to ensure that AMP, its entities, and staff are protected from bribery and corruption risk. The Policy is in place to ensure AMP meets its ABC obligations and demonstrate compliance with regulatory requirements.

- Review period: Biennially
- Approver: The combined Risk and Compliance Committee of the AMP Limited Board and the AMP Bank Limited Board
- Policy Owner: Chief Risk Officer
- Policy Manager: Head of Financial Crime Compliance

4. Approvals and Exemptions

Approvals

This Policy is reviewed by the CRO and approved by the combined Risk and Compliance Committee of the AMP Limited Board and AMP Bank Limited Board.

An out of cycle review can be triggered in certain circumstances as determined by FCC, including but not limited to:

- changes to Australian and/or global ABC legislation or regulation that AMP is subject to;
- changes to AMP's business activities; and
- changes to AMP's risk appetite upon review of AMP's obligations or risk assessments.

Exemptions

The Approver may grant exemptions to this Policy. Exemptions must be documented and may be subject to conditions.

Exemptions will not be granted based on an inability to comply with this Policy. An exemption for instance may be granted where the Policy is not applicable to a jurisdiction. Exemptions will be granted for a maximum period of 12 months. Breaches of this Policy must be notified to either the Approver or Manager and must be managed in accordance with the **Incident, Issue and Breach Management Policy**.

Non-compliance with this Standard may result in disciplinary action in accordance with the Consequence Management Policy.

5. Monitoring and Oversight

The CRO is accountable for ensuring that AMP complies with and meets the relevant ABC legislation in the jurisdictions which the AMP DBG operates. In addition to this, the CRO (or delegate) must ensure that the Policy is regularly reviewed and updated to ensure it continues to address the bribery and corruption risk that members of the AMP DBG reasonably face.

Oversight of the AMP ABC Policy is managed through the Financial Crime Compliance Committee (FCCC) and escalations to the Group Risk and Compliance Committee (GRCC), as required.

6. Appendices

6.1 Key Roles and Responsibilities

The table below outlines the key roles and their responsibilities as it pertains to this Policy.

Role	Responsibility
All Staff	<ul style="list-style-type: none"> Familiarise themselves with the policy Report any concerns to their line manager or P&C
P&C	<ul style="list-style-type: none"> Manages the investigation of allegations of bribery and corruption Assesses substantiated allegations as part of the Consequence Management Committee
AMP Legal	<ul style="list-style-type: none"> Manages the investigation of allegations of bribery and corruption that are raised under the whistleblowing procedures.
Business Units	<ul style="list-style-type: none"> Accountable for the completion of the BU Risk Assessments, and the identification, assessment and management of the identified risks Accountable for the implementation of the ABC policy and obligations
Business Unit Chief Risk Officer (CRO)	<ul style="list-style-type: none"> Responsible for assisting BUs to manage and mitigate BU related ABC risks.
CRO	<ul style="list-style-type: none"> Accountable for the development and oversight of the ABC framework.
Financial Crime Compliance (FCC)	<ul style="list-style-type: none"> Assisting the business units in the interpretation and resolution of ABC related issues and communicating updates in relation to ABC requirements. Oversight and assurance over ABC obligation management by BUs. Responsible for developing and maintaining this Policy and supporting artefacts (including the ABC risk assessment methodology). Assessing potential breaches and reporting non-compliance with the Policy. Collating the enterprise-wide ABC risk assessment. Review and support completion of the BU Risk Assessments.
GRCC	<ul style="list-style-type: none"> ABC oversight, governance and engagement, and fostering a culture of ABC compliance. Assess material breaches of this Policy.
Group Compliance (ERM)	<ul style="list-style-type: none"> Management and maintenance of the Gifts and Benefits Register and the Conflicts of Interest Register.