

Group Anti-Bribery and Corruption Policy

Purpose and scope

Purpose

This Policy sets out the Group's Anti-Bribery and Corruption (AB&C) zero risk appetite and the principles that form the foundation for the Group's AB&C management framework. This framework enables the Group to prevent, detect and respond to Bribery and Corruption risks and to comply with AB&C laws in the jurisdictions in which the Group operates.

Scope

This Policy applies to all Associated Persons of the Group. This includes Directors (Executive and non-Executive), Employees, subsidiaries and controlled entities of the Group, and Third Parties acting for or on behalf of the Group.

Associated Persons of the Group must be aware and are responsible for understanding how this Policy applies to their role and are accountable for ensuring compliance with all applicable Bribery and Corruption obligations.

The 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 in which that activity or behaviour occurs.

This Policy applies to all Group entities and BU/SUs where entities have delegated operational responsibility to the BU/SU.

For those parts of the Group that are subject to local laws, regulatory requirements or contractual obligations specific to their jurisdiction that conflict with this Policy, the Group AB&C Standard, or the Group Gifts & Entertainment Procedure, the BU/SU or Group entity must comply with the more stringent standard and ensure that local laws are not contravened.

PTBC and ASB maintain local AB&C Policies in accordance with local regulatory requirements. CBA Europe N.V. maintains a local AB&C Policy and G&E Resource in accordance with local regulatory requirements.

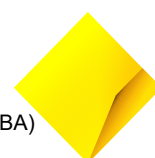
Policy statement

The Group and its Associated Persons must be aware of and understand the Group's AB&C obligations and requirements in order to manage 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.

The Group operates a zero tolerance approach to Bribery and Corruption and considers such activity to be unethical and contrary to good corporate governance. In pursuing our purpose, the Group aims to protect our customers and communities by acting to prevent all forms of Bribery and Corruption.

Policy requirements

The AB&C Principles set out below should be read in conjunction with the Group AB&C Standard.



1. Zero appetite towards Bribery, Corruption and Facilitation Payments

The Group has zero appetite towards Bribery, Corruption and Facilitation Payments.

Associated Persons acting for or on behalf of the Group are prohibited from:

- engaging in any kind of Bribery, Facilitation Payment, or Corrupt behaviour, regardless of whether or not a benefit is given to or received by another person, including Public Officials, and regardless of the value of the benefit;
- falsifying any book, record or account of the Group or any related documentation to conceal bribery or corruption; and
- making political donations in the form of cash/money on behalf of the Group. Other political related expenditure, such as sponsorships, memberships, payments to attend political events, and gifts or entertainment to be given to political stakeholders or senior government officials, must undergo appropriate approvals and conform with relevant policies, standards and procedures.

Offering or making a Facilitation Payment of any kind is prohibited, regardless of the provisions of applicable law. Where a Facilitation Payment is required to protect against perceived or actual immediate danger to personal safety, it must be immediately reported to Protective Security, Financial Crime Compliance or the relevant local BU/SU risk and compliance team.

2. Identifying, mitigating and managing Bribery and Corruption risks

The Group identifies, manages and mitigates Bribery and Corruption risks by:

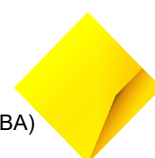
- undertaking AB&C risk assessments on a Risk Based Approach to identify the Bribery and Corruption risks each BU/SU may reasonably face, giving consideration to the nature of our organisation, our Employees, Third Parties, customer types, occupation and industry of our customers and Third Parties, transactions and business practices, and the location of the BU/SU and its business activities;
- responding to events, relationships or enterprises that could increase or alter a BU/SU's risk exposure; implementing appropriate systems, controls, processes and procedures to mitigate and manage each BU's Bribery and Corruption risks, as identified through the risk assessment;
- making a record of AB&C risks and associated controls in RiskInSite in accordance with the Compliance Management Framework (CMF) and Group Operational Risk Management Framework Policy; and
- conducting regular monitoring and testing of AB&C processes and controls to evaluate their effectiveness and identify and respond to opportunities for continuous improvement.

3. 'Speaking up' and reporting of AB&C matters

The Group fosters a culture of speaking up to encourage reporting of any suspicion of a Bribery and/or Corruption incident, or other concerns relating to AB&C without fear of reprisal.

The Group works to ensure all Eligible Persons understand:

- how to report a Bribery and/or Corruption incident, or other concern relating to AB&C;
- their right to remain anonymous and what happens when they report their concerns; and
- how they will be supported so that they can feel safe in expressing their concerns and not be subject to reprisals in response to expressing their concerns.



All allegations of Bribery and Corruption or other related concerns are to be reported at the earliest opportunity or upon the concern being discovered via the relevant Bribery and Corruption reporting channels listed below.

If you have concerns about your own wellbeing, treatment at work or career prospects as a result of speaking up, the Group has a whistleblowing program, managed in accordance with the Group Whistleblower Policy, to protect Eligible Persons who make disclosures and to provide support to people speaking up in relation to Bribery and Corruption and other related matters.

Principal channels for reporting Bribery and Corruption concerns	
Line management	Directly to your line manager, Manager once Removed (MOR) or Senior Management
Group Investigations	[REDACTED]
Financial Crime Compliance	Group AB&C Officer (EGM FCC)
SpeakUP Hotline	[REDACTED] (free call inside Australia)
	[REDACTED]
SpeakUP Online	Via the Group's intranet or at [REDACTED]

Additional contact details for reporting Bribery and Corruption concerns may be available for offshore entities.

The Group will assess and investigate all allegations of Bribery, Corruption and other related AB&C matters independently of BU/SUs and determine whether or not the allegation is substantiated. If substantiated, it must be determined whether the conduct amounts to AB&C Reportable Conduct requiring escalation to the CBA Board, Board Risk and Compliance Committee, Group AB&C Officer, relevant EGM/GE and CROs, the relevant legal team, HR, regulators and enforcement agencies, as appropriate. Regulatory reporting obligations may arise if a Bribery or Corruption incident occurs.

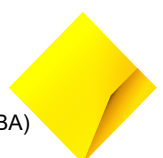
4. Transparency and record keeping

The Group maintains transparency and mitigates Bribery and Corruption risks through our policies, standards and procedures relating to:

- gifts and entertainment;
- political donations and lobbying;
- conflicts of interest;
- corporate expenses;
- employee due diligence and recruitment;
- donations and sponsorships; and
- third parties.

The Group maintains appropriate records of financial and non-financial controls and ensure that they are accurate and protected against improper use or loss of integrity.

The Group must comply with the recording, reporting and approval requirements set out in the Group Gifts and Entertainment Procedure, Group Conflicts Management Policy and Group Expense Management Policy and Procedures.



5. Due Diligence

Employee Due Diligence

The Group identifies and manages Bribery and Corruption risks in relation to all prospective and existing Employees and Directors by undertaking appropriate due diligence screening with the objective of ensuring their identity, honesty and integrity.

The Group must not offer or provide employment opportunities, whether paid or unpaid, permanent or temporary, as an inducement to anyone to act improperly to obtain or retain an advantage in business.

We undertake due diligence screening on all Employees and Directors:

- prior to commencement of their role with the Group; and
- in circumstances which are subject to ongoing Employee due diligence requirements.

Screening is undertaken in accordance with the Group Financial Crime Employee Due Diligence Standard.

Third party due diligence

The Group must know who we are doing business with and who is conducting business on our behalf.

In relation to Third Parties, BU/SUs must:

- assess Third Party AB&C risk, undertake appropriate due diligence on and maintain records relating to prospective and existing Third Parties;
- undertake ongoing due diligence on existing Third Parties in order to ensure that any new information or relevant changes which may impact AB&C risk can be considered; and
- ensure that contracts with Third Parties contain appropriate AB&C clauses.

6. Training and awareness

The Group ensures that Associated Persons are aware of the Group's zero appetite towards Bribery and Corruption, and promote a culture of compliance with AB&C obligations.

The Group periodically communicates to Associated Persons its commitment to its AB&C risk appetite and prevention of Bribery and Corruption.

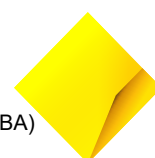
The Group provides an ongoing AB&C risk awareness training program to Employees and Directors which includes information on when and how to seek advice and how to report any concerns or suspicions of Bribery and Corruption. BU/SUs maintain records of AB&C training completion and monitor training completion rates.

Employees must undertake all assigned AB&C training and successfully complete the post-training assessment and/or attestation. This includes:

- mandatory AB&C Risk Awareness training in the Financial Crime module; and
- for Employees within designated High Risk Roles, AB&C for High Risk Roles training.

BU/SUs should consider whether further targeted training is also appropriate for Associated Persons in light of:

- the activities and location(s) of the BU/SU's operations;
- any identified Bribery and/or Corruption incidents, or other concerns arising in relation to AB&C;



- the apparent existence of AB&C red flags as set out in the Group AB&C Standard; and/or
- the assessment that a Third Party represents a heightened level of AB&C risk.

BUs/SUs should develop and conduct targeted training, as necessary, in consultation with FCC.

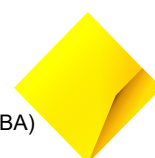
Compliance with AB&C regimes

The Group must comply with:

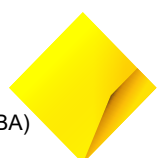
- all applicable AB&C laws and regulations relevant to the BU/SU's jurisdiction,
- which at a minimum includes the *Australian Criminal Code Act 1995* (Cth), *UK Bribery Act 2010* and *US Foreign Corrupt Practices Act 1977*;
- any other AB&C or related laws that require compliance even where business activity may be carried out in another country, (i.e., any legislation with extraterritorial effect); and
- reporting and accounting obligations imposed by regulators and/or enforcement agencies.

Accountabilities

If you are	You are accountable for
<i>CBA Board</i>	<ul style="list-style-type: none"> • Approving this Policy, and any material changes to it.
<i>Group Chief Risk Officer</i>	<ul style="list-style-type: none"> • Reporting to the Chief Executive Officer, Group NFRC and Board Risk and Compliance Committee on any breaches or material issues regarding AB&C matters.
<i>Group AB&C Officer (EGM FCC)</i>	<ul style="list-style-type: none"> • Overseeing the design and implementation of the Group's AB&C management framework. • Promoting a culture of compliance with the AB&C obligations through periodically communicating the Group's commitment to the prevention of Bribery and Corruption. • Providing advice and guidance on AB&C controls/ frameworks and issues relating to AB&C. • Ensuring that the Group's AB&C management systems comply with the principles set out in this Policy and the Group AB&C Standard. • Reporting and escalating AB&C matters to the appropriate stakeholders (including the Chief Risk Officer) and relevant governance forums, including the Group NFRC and Board Risk and Compliance Committee. • Ensuring this Policy and the Group AB&C Standard are periodically reviewed, and updated, in consultation with the BU/SUs.
<i>BU/SU BEAR Accountable Executive</i>	<ul style="list-style-type: none"> • Ongoing oversight regarding Bribery and Corruption risk as it affects BU/SU accountabilities and ensuring implementation



<i>[Line 1]</i>	and compliance with principles set out in this Policy and the Group AB&C Standard.
<i>BU/SU Senior Management</i> <i>[Line 1]</i>	<ul style="list-style-type: none"> • Supporting your staff in meeting the requirements of this Policy. • Escalating any AB&C-related concerns to FCC and/or Group Investigations, as appropriate. • Escalating all Bribery and/or Corruption allegations raised by Employees to Group Investigations at the earliest opportunity
<i>BU/SU Line Management and MORs</i> <i>[Line 1]</i>	<ul style="list-style-type: none"> • Escalating Bribery and/or Corruption allegations raised by Employees to Group Investigations at the earliest opportunity.
<i>Employees</i>	<ul style="list-style-type: none"> • Ensuring you comply with the principle of a zero appetite towards Bribery, Corruption and Facilitation Payments. • Understanding the process for 'speaking up' and reporting AB&C matters. • Being aware of and responding to AB&C risks and incidents, including reporting Bribery and Corruption concerns internally to line management, FCC, Group Investigations, the SpeakUP Hotline, SpeakUP Online and/or in accordance with Whistleblower or AB&C escalation and reporting processes. • Meeting the requirements of other relevant Group policies, standards and procedures, any BU/SU AB&C procedures and record keeping requirements. • Completing your mandatory AB&C Risk Awareness Training, post-training assessment and/or attestation and, if required, AB&C training for high risk roles within the assigned timeframes.
<i>BU/SU</i> <i>[Line 1]</i>	<ul style="list-style-type: none"> • Developing and implementing appropriate processes, procedures, systems and controls to comply with this Policy and the Group AB&C Standard. <p>NFR Committees</p> <ul style="list-style-type: none"> • Ensuring adequate oversight of Bribery and Corruption risk through the respective BU/SU NFR Committees and other governance forums, as appropriate.
<i>BU/SU Risk & Control function</i> <i>[Line 1]</i>	<ul style="list-style-type: none"> • Monitoring and testing over AB&C compliance in accordance with the Group's Three Lines of Accountability framework.
<i>FCC AB&C</i> <i>[Line 2]</i>	<ul style="list-style-type: none"> • Providing support and guidance to BU/SUs in relation to the AB&C framework.



	<ul style="list-style-type: none"> Accepting and/or approving BU/SU AB&C escalations. <p>Maintaining and reviewing this Policy, the Group AB&C Standard and supporting resources biennially, at a minimum.</p>
<i>FCC Assurance</i>	<ul style="list-style-type: none"> Providing assurance over BU/SU compliance with the principles set out in this Policy and the Group AB&C Standard in accordance with the annual risk-based FCC Assurance Plan.
<i>FCC Assessments</i>	<ul style="list-style-type: none"> Performing financial crime related risk assessment pursuant to the Financial Crime Risk Assessment Standard. Performing management and oversight of AB&C related RiskInSite issues and incidents including liaison with FCC AB&C as/when required.
<i>Group Investigations</i>	<ul style="list-style-type: none"> Ensuring allegations of Bribery and Corruption reported are investigated. Escalating allegations of Bribery and Corruption reported in accordance with the Group AB&C Standard.
<i>Group Audit & Assurance</i> [Line 3]	<ul style="list-style-type: none"> Conducting an independent review of the AB&C management framework in accordance with the Group Audit & Assurance plan and the Group's Three Lines of Accountability framework.

Compliance statement

Compliance with this Policy supports compliance with AB&C laws in the jurisdictions in which the Group operates. This Policy forms part of the Group AB&C compliance framework which is a framework of systems, processes and controls to prevent, detect and respond to Bribery and Corruption risks.

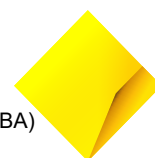
Breach of policy

Consequences All Associated Persons of the Group have accountability to protect the Group, its reputation, and themselves from the risks arising from Bribery and Corruption.

All reasonable steps will be undertaken to comply with this Policy. A breach of this Policy may be regarded as misconduct, which may result in disciplinary action (including termination of employment or engagement).

This Policy must be read together with the Group AB&C Standard, which sets out the minimum requirements necessary for complying with this Policy. Failure to follow the Group AB&C Standard may amount to a breach of this Policy. BU/SUs and Associated Persons must also recognise that:

- A breach of AB&C laws may result in legal or regulatory action including criminal proceedings and the revocation of licences, significant reputational damage and/or financial loss - to Employees, Group entities and to the Group as a whole.



- A Group entity may be liable for the failure to prevent the Bribery of a foreign Public Official or another person by an Associated Person acting for or on behalf of the Group if the Associated Person bribes for the profit or gain of the Group entity even where the Associated Person has not been convicted of the foreign Bribery offence. The entity may have a defence where it can demonstrate that it had adequate procedures in place designed to prevent the commission of an act of foreign Bribery by its Associated Persons acting for or on behalf of the Group.
- The offence of Bribery of a foreign Public Official can apply even when the conduct occurred outside the jurisdiction to which the offence relates.
- Employees who are Directors of the Group's majority and/or minority owned subsidiaries and investments may also be exposed to personal liability for breaches of AB&C laws.
- The Group will cooperate with authorities if any legal, regulatory or criminal investigations or proceedings are brought in relation to alleged violation of AB&C laws. This includes in relation to any investigation of, or proceedings relating to, Associated Persons.

Escalation

Steps should be taken to continue to enhance processes and controls in response to mitigating the re-occurrence of incidents of Bribery and/or Corruption.

Potential or confirmed breaches of the obligations outlined in this Policy must be escalated according to the Group Issue Management Standard or Group Compliance Incident Standard and Procedures, and in accordance with the Group AB&C Standard.

Material breaches of this Policy must be reported to the CBA Board and Board Risk and Compliance Committee.

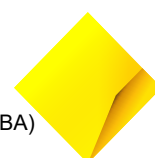
Definitions

In this Policy, defined terms are capitalised. Those terms have the meaning given to them below or, if not defined below, in the Group Policy Framework Glossary.

AB&C	Anti-Bribery and Corruption.
AB&C Reportable Conduct	Investigated and substantiated allegations of: <ul style="list-style-type: none"> • bribery, • corruption, • facilitation payments, • failing to meet record keeping obligations, and • failing to prevent an act of Bribery occurring which require escalation to the CBA Board, Board Risk and Compliance Committee, Group AB&C Officer, relevant offshore MLRO (where applicable), relevant EGM/GE and CROs, relevant legal team(s), HR, regulators and enforcement agencies, as appropriate.
Advantage	A financial or non-financial benefit, circumstance or opportunity that puts one party in a more favourable or superior position.
Anything of value	Any advantage, financial or otherwise. It extends beyond cash and cash equivalents to include gifts, entertainment, services, amenities, charitable contributions, and employment etc. There is no minimum amount or threshold value that must be exceeded before a 'thing of value' may be illegal or impermissible. The purpose for which the thing of value was offered or received need not be achieved in order for there to be a Bribery risk.



Associated Persons	Directors (Executive and non-Executive), Employees, subsidiaries and controlled entities of the Group, and Third Parties acting for or on behalf of the Group.
Bribe or Bribery	<p>The offer, promise, giving, requesting, authorising or receiving of anything of value (whether a financial or other advantage) directly or indirectly to another person(s) with the intention of influencing or rewarding improper performance. 'Another person' can include, but is not limited to: a Public Official, Third Party, supplier, customer, etc.</p> <p>Bribery can include either 'active bribery', in which a person offers or gives something of value to influence performance or obtain an unfair advantage, or 'passive bribery', in which a person receives, attempts to receive, or requests something of value in exchange for improper performance.</p> <p>Authorising such activity is also considered Bribery, as is providing a payment to a Third Party while suspecting, knowing, or having reason to know that some or all of it will be passed along to another person for improper purposes.</p>
Corruption	An act or omission for an improper or unlawful purpose, which involves the abuse of a position of trust or power.
Eligible Persons	Refer to the definition in the Group Whistleblower Policy.
Employee	<p>For the purposes of this Policy and the Group AB&C Standard, an Employee includes:</p> <ul style="list-style-type: none"> • Permanent employees: employed directly through the Group as a regular, maximum term, casual, non-executive director, international assignee or intern. • Contractors: employed through a preferred recruitment agency. • Service providers: employed by a Third Party vendor and have access to the Group's IT network and systems.
Facilitation Payment	A payment of minor value paid to a Public Official via unofficial channels to expedite or secure the performance of a routine government action of a minor nature (e.g., the approval of permits and licences).
Financial Crime Compliance (FCC)	For the purposes of this Policy and the Group AB&C Standard, FCC operates as a Line 2 function in Risk Management and includes policy and regulatory engagement, advisory and assurance responsibilities.
Group Investigations	The team that is accountable for managing the SpeakUP Program and the investigation of internal fraud, serious misconduct and major external fraud events involving serious or organised crime.
High Risk Roles	Roles that meet the high risk role characteristics defined in the Group Financial Crime Employee Due Diligence Standard.
MOR	Manager Once Removed
Non-customer	<p>A Non-customer (also known as a counterparty or a non-trading relationship) is an individual or entity who is not considered a customer of the Group under Part B (AML/CTF Program) or the Global Customer Due Diligence Resource as they do not receive a designated service or have products/services being provided by the Group, however their relationship to the Group presents financial crime risk exposure.</p> <p>A Non-customer is an individual or entity that is associated to a Group customer transaction but is not the transacting customer or related party of the customer.</p>



Protective Security The team in Technology that is accountable for security incident response and the 24/7 Security Operations Centre that answers phone-calls to the Group Emergency Hotline.

Public Official (foreign or domestic) A Public Official is an elected or appointed official, employee or representative of a government (which includes the executive, legislative, administrative, military, or judicial branches of a government; a political party; or a government-owned, government-controlled, or government-funded corporation, institution or charity) at any level, and may include:

- Government regulators and persons acting in an official capacity on behalf of government regulators;
- Employees of self-regulatory organisations in the financial services industry (even if the self-regulatory organisation is not government-sponsored);
- Members of a royal family;
- Officials or public office candidates of any political party;
- Officers, directors or employees of organisations with government ownership or control (as defined below), including:
 - Sovereign wealth funds;
 - Public pension funds;
 - State owned or controlled organisations, such as hospitals, financial institutions, utility companies and other corporations;
- Officers, directors or employees of educational institutions that are established or operated by a federal, state, or local government entity; and
- Officials of public international organisations and persons acting in an official capacity for or on behalf of governments or public international organisations, including but not limited to:
 - The World Health Organisation;
 - United Nations development agencies;
 - International Red Cross;
 - International Monetary Fund; and
 - The World Bank Group.

“Government ownership or control” means a single government or its instrumentality, which:

- Owns at least 50% of an entity; or
- Exercises actual management or control of an entity, irrespective of its ownership percentage.

The definition of a Public Official varies across jurisdictions. BU/SUs should refer to their BU/SU legal team, Group legal counsel, FCC or their local risk and compliance team for detailed guidance on definitions.

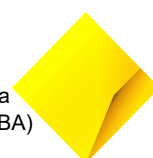
Risk Based Approach Identifying the highest compliance risks first, making them a priority for compliance controls, policies and procedures and once the compliance program reduces those highest risks to acceptable levels, it moves on to lower risks.

Senior Management General Manager (or equivalent) and above.

Third Party Any external party (not a Group entity) with whom the Group has, or plans to establish, some form of business relationship.

This Third Party definition excludes:

- Ad-hoc low value business expenses where no formal relationship is being established;



- Customers of the Group (that are not additionally engaged as a Third Party) as defined by the Joint AML/CTF Program Part B and Global Customer Due Diligence Resource for IB&M; and
- Non-customers associated to a CBA customer transaction.

Further information about types of Third Parties can be found in the AB&C Third Party Resource.

You Employees and Directors

Policy governance

Approver	CBA Board
Exemption Authority	Group Chief Risk Officer
Owner	EGM Financial Crime Compliance (Group AB&C Officer)
Support	Financial Crime Compliance or BU/SU Risk and Compliance
Review Cycle	Biennial
Next Review Date	31 December 2025

Relevant documents

Related internal documents	GPF Glossary
	Group Issue Management Procedure
	Group Incident Management Procedure
	Group Anti-Bribery and Corruption Standard
	Compliance Management Framework (CMF)
	Operational Risk Management Framework Policy
	Code of Conduct
	Group Whistleblower Policy
	Group Gifts and Entertainment Procedure
	Group Conflicts Management Policy
	Group Product Development and Distribution Policy
	Group Supplier Lifecycle Policy
	Group Supplier Lifecycle Procedure
	Group Expense Management Policy
	Group Financial Crime Employee Due Diligence Standard
	Group Financial Crime Risk Assessment Standard
PTBC Anti-Bribery and Corruption Policy	
ASB Anti-Bribery and Corruption Policy	



External sources of obligations

CBA Europe N.V. Anti-Bribery and Corruption Policy, including Gifts and Entertainment Resource

Australian Criminal Code Act 1995 (Cth)

UK Bribery Act 2010

US Foreign Corrupt Practices Act 1977

Other AB&C laws relevant to a BU/SU's jurisdiction.

Material revisions

Version	Approval Date	Effective Date	Details
5	29 April 2018	01 May 2018	Material revisions to format, policy principles and definitions.
6	11 December 2018	11 December 2018	Revision to template and minor adjustments to text.
6.1	28 June 2019	28 June 2019	Revision to template; immaterial revisions to Principles 1 and 6, and definitions
6.2	24 June 2020	24 June 2020	Immaterial revision to Principle 2 in relation to risk assessment frequency.
6.3	09 December 2020	31 December 2020	Annual review; immaterial revisions approved by CBA Board.
6.4	28 April 2021	03 May 2021	Immaterial revision to remove reference to AHL under Purpose and Scope due to divestment; addition of subsidiary policies under Relevant Documents.
6.5	25 May 2023	25 May 2023	Immaterial edits as part of FCC Policy Suite harmonisation and to adopt the latest GPF template.
7	14 December 2023	30 December 2023	Periodic Review. Revision to add references from updated global guidance and aligned definitions and updated FCC accountabilities. Include reference to Associated Persons.

