

Anti-bribery and Corruption Policy

1 Purpose

This *Anti-bribery and Corruption Policy* describes the commitment to compliance with anti-bribery and corruption laws for BGC (Australia) Pty Ltd, Esther Investments Pty Ltd and all their related and associated bodies corporate (**BGC**).

BGC is committed to operating fairly and ethically in all our business practices in compliance with all anti-bribery and corruption laws applicable to our operations.

2 Scope

This Policy:

- extends to all of BGC's dealings and transactions, both locally and overseas, with clients, government authorities, contractors, suppliers and the community as a whole;
- applies to all BGC directors, officers, employees, (**BGC Personnel**) and to the extent expressly specified in this Policy, to BGC's contractors, suppliers and agents, regardless of where they are geographically located or locations in which they perform work for BGC; and
- must be complied with even if the applicable local laws in any geographical area are not as strict as the requirements set out in this Policy.
- Where local laws are stricter, BGC personnel must comply with those laws in addition to this Policy.
- This Policy applies to BGC's operations worldwide to ensure that BGC complies with anti-bribery laws that may apply beyond their national borders (including the Australian [Criminal Code Act 1995](#) the UK [Bribery Act 2010](#) and the US [Foreign Corrupt Practices Act 1977](#)).

If you are in doubt about whether something will violate this Policy or relevant laws, please contact BGC's Head of Legal (Ryan Hawkins, rhawkins@bgcaus.com.au, 6220 4735) before proceeding any further.

This Policy is supported by BGC's *Anti-bribery and Corruption Procedure*.

3 Policy

BGC takes a zero-tolerance approach toward bribery and corruption by all BGC Personnel, suppliers, contractors and agents.

BGC is committed to ensuring that bribery and corruption does not occur but, in the event it does, appropriate action is taken quickly.

BGC is committed to demonstrating particular vigilance in managing anti-bribery and corruption risk when we operate, or when we engage subcontractors or suppliers to operate, in countries where bribery and corruption may be more prevalent.

The intended outcome is to build a successful and sustainable business that has a reputation for honesty and integrity; and to create a culture that aligns to BGC's values, with a workplace that is free from all forms of bribery and corruption.

- We will manage reports of bribery and corruption in a fair, impartial, efficient and respectful manner.
- Persons will not be treated unfavourably because they have raised a bribery or corruption issue pursuant to this Policy.

- BGC will encourage its leaders to model ethical behaviour and be accountable for adherence to the law by their teams.
- BGC will educate BGC Personnel as to the nature and effects of bribery and corruption, and provide the necessary resources to inform them of the contents of this Policy.
- Accordingly, all BGC Personnel are to behave ethically and honestly; treat bribery and corruption matters seriously, and deal with them in a prompt, confidential and fair manner; and report any incidents to an appropriate person.

4 Review

This Policy will be reviewed annually and revised as required to maintain relevance, effectiveness and appropriateness to our business.

5 Compliance

BGC does not tolerate retaliation of any kind against personnel who raise genuine concerns or who participate in the investigation of a report of suspected misconduct. If you engage in retaliation you will be subject to disciplinary action, which may include termination of your employment.

BGC treats any breach of its *Anti-bribery and Corruption Policy* by any person or entity (including BGC contractors and suppliers) as a serious matter, and reserves the right to take appropriate disciplinary steps against any offenders where it considers it warranted.

The financial penalties for bribery offences can potentially be very significant and serious for individuals and BGC, and may include fines of an unlimited amount and/or criminal sanctions.

6 Approval

This Policy has been approved and authorised by:



Daniel Cooper
Chief Executive Officer
30 October 2020