



Anti-Bribery and Corruption Policy

Liberty Financial Group Limited (ABN 59 125 611 574)

1. Overview

- 1.1 Liberty Financial Group Limited (ABN 59 125 611 574) (**Company**) and Liberty Fiduciary Ltd (ABN 80 119 884 623) (**RE**) as responsible entity of the Liberty Financial Group Trust and their controlled entities (together, **Liberty**) are committed to conducting the business of Liberty with integrity. This Anti-bribery and Corruption policy (**Policy**) outlines those standards that govern the activities of Liberty.
- 1.2 The ordinary shares in the Company and the ordinary units in the Trust are stapled together and quoted on the ASX.
- 1.3 The Company or its controlled entities is the employer of all staff that provide services to RE and the Trust under a Services Agreement between the Company, the RE and the RE as a responsible entity for the Trust.

2. Who does this Policy apply to?

This Policy applies to anyone who is employed by or works at Liberty, including employees (whether permanent, fixed-term or temporary), contractors, consultants, secondees and directors wherever located (collectively referred to as **Staff**).

3. Objectives

- 3.1 Liberty is committed to conducting its business and activities with integrity. To achieve this objective, Liberty:
 - (a) will not engage in corrupt business practices;
 - (b) will implement measures to prevent bribery and corruption by any director, employee, contractor or other party representing Liberty; and
 - (c) will comply with all applicable laws, regulations and standards.
- 3.2 Staff must:
 - (a) not offer, pay, solicit or accept bribes in any form;
 - (b) not engage in any form of corrupt business practice, whether for the benefit of Liberty, themselves or for any other party;
 - (c) comply with the laws and regulations which apply to Liberty and its business;
 - (d) comply with this Policy and all Liberty procedures; and
 - (e) report any concern or suspected or potential breach of the Policy immediately to the Reporting Officer.

4. What behaviour is prohibited by the Policy?

Bribery, kickbacks and secret commissions

- 4.1 Staff are not permitted to:

- (a) give, offer, promise, accept, request or authorise (whether directly or indirectly):
 - (i) a bribe;
 - (ii) kick-back; or
 - (iii) secret commission,
 - (b) as an inducement or reward for doing or not doing something, or showing or not showing favour or disfavour to any person in relation to business matters;
 - (c) act as an intermediary for the solicitation, acceptance, payment or offer of a bribe, kick-back or secret commission; or
 - (d) use any other improper or illegal means (including favours, threats, inducements or other rewards) to influence the actions or decisions of others.
- 4.2 Staff must not do any of the above in their 'personal capacity' in an attempt to evade the requirements of this Policy.

Facilitation payments

- 4.3 Facilitation payments are payments made with the purpose of expediting or facilitating the performance by public official of a routine governmental action. Facilitation payments are typically demanded to obtain services which, under normal conditions should be provided in any event.
- 4.4 Staff must not make facilitation payments.

Genuine offers

- 4.5 Staff must not give, seek or accept in connection with Liberty's business any gifts and benefits which goes beyond common courtesies associated with the ordinary and proper course of business as it may be construed as a bribe or improper inducement.
- 4.6 Under this Policy, Staff can accept gifts or benefits worth \$100 or more only if the amount relates to:
- (a) work related conferences;
 - (b) invitations to speak at a professional association (including flights and accommodation); or
 - (c) other business-related benefits if approved by the Chief Financial Officer, or the Board if it relates to a benefit to the Chief Financial Officer.

Charitable donations

- 4.7 Charitable or community donations and sponsorships can sometimes be used as a disguise for bribery, for example where a donation is provided to a 'charity' which is controlled by a person who is in a position to make decisions affecting Liberty.
- 4.8 Staff must take care to ensure through due diligence and transparency that charitable or community donations and sponsorships made on behalf of Liberty do not constitute bribery

- 4.9 Liberty can only make charitable donations that are legal and ethical under local laws and practices. In Australia, this means that an organisation must have deductible gift recipient status within the Australian Tax Office. This status makes the organisation entitled to receive income tax deductible gifts and deductible contributions
- 4.10 No donation must be offered or made on behalf of Liberty, without the prior approval of a senior manager of Liberty or the Reporting Officer.

Improper dealing of accounting records

- 4.11 Liberty strictly prohibits the intentional or reckless act of making, altering, destroying, concealing or doing something with an accounting document with the intention of concealing or disguising the receiving or giving of a bribe.

5. Procedures in implementing and monitoring compliance

- 5.1 Liberty will ensure that all Staff (including new Staff) are informed about and understand this Policy. Each Staff member (including new Staff) will receive a copy of this Policy and be provided with training.
- 5.2 Every senior manager must communicate this Policy and ensure that all Staff reporting to them, within their area of responsibility, understand the prohibitions in this Policy.

6. Responsibilities of all parties

- 6.1 Staff are expected to:
- (a) read, understand and comply with the terms of this Policy;
 - (b) undertake all requisite education and training provided in relation to the laws and regulations relating to bribery and corruption and the Policy; and
 - (c) immediately report any concern, suspected or potential breaches of this Policy to either:
 - (i) the Chief Executive Officer;
 - (ii) the Chief Financial Officer;
 - (iii) their immediate senior manager;
 - (iv) Reporting Officer; or
 - (v) a Whistleblower Officer in accordance with our Whistleblower Policy, which is available in www.lfgroup.com.au.
- 6.2 All material breaches of the Policy must be reported immediately to the Board.
- 6.3 Liberty has a Whistleblower Policy, protecting Staff (and other eligible persons) against certain reprisals, harassment or demotion for making a report.

7. Reporting officer

Liberty's Reporting Officer is the Company Secretary of the Company and can be contacted via LINK Market Services on 1300 554 474 by requesting the representative for Liberty

8. Consequences for breaching the Policy

- 8.1 Any suspected breaches of this Policy will be thoroughly investigated and reported to the Board.
 - 8.2 Failure to comply with this Policy will be regarded as serious misconduct and may lead to disciplinary action, up to and including legal action, dismissal or termination. Conduct in violation of this Policy may also breach applicable anti-corruption laws and result in criminal or civil penalties, including fines and imprisonment.
 - 8.3 Staff must cooperate fully and openly with any investigation by Liberty into alleged or suspected corrupt activity or breach of this Policy. Failure to cooperate or to provide truthful information will be regarded as serious misconduct and may lead to disciplinary action, up to and including dismissal or termination
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9. Other matters

- 9.1 The Board, in conjunction with the Audit and Risk Management Committee, will review this Policy periodically.
- 9.2 This Policy can only be amended with the approval of the Board. The Company Secretary will communicate any amendments as appropriate.