

MA Anti-Bribery and Corruption Policy

October 2024

The background of the page is a solid blue color. Two white, curved lines originate from the bottom left corner and sweep upwards and to the right, creating a sense of movement and design. The lines are thin and elegant, adding a modern touch to the cover.

1. Policy Statement

MA Financial Group Limited and each of its related bodies corporate (**MA Financial**) is committed to conducting business in an honest and ethical manner, and maintaining a high standard of integrity, client confidence and good corporate governance.

MA Financial takes a zero-tolerance approach to bribery and corruption and is committed to implementing and enforcing systems that ensure bribery is prevented. As part of this commitment, we will not tolerate any form of bribery or corruption in our business or in those we do business with.

2. Purpose

MA Financial's Anti-Bribery and Corruption Policy (**Policy**) is a critical component of MA Financial's delivery on its core values of fairness and accountability and outlines MA Financial's requirements regarding the management of gifts, hospitality and other benefits, dealings with government or public officials, facilitation payments, political and charitable contributions, and dealings with third parties.

This Policy forms part of MA Financial's wider policy framework, which includes MA Financial's Code of Conduct, Conflicts of Interest Policy, Anti-Money Laundering Program, Whistleblower Policy and other associated risk and compliance policies.

3. Scope

This Policy applies to all MA Financial employees (whether permanent, fixed-term or temporary), contractors, agents, consultants, secondees and directors wherever located (collectively referred to as **Employees**).

This Policy applies globally. If travelling or based outside of Australia, MA Financial employees are subject to the laws of the country they are in. However, the principles of this Policy must be followed regardless of whether that country has specific anti-bribery and corruption laws. Where a country has anti-bribery and corruption laws which are of a lesser standard to this Policy, this Policy prevails.

4. Definition of Bribery and Corruption

Bribery is the offering, promising, authorising, giving, accepting or soliciting of a bribe to influence someone in government or business either in their personal or official capacity, to obtain or retain a business or personal advantage.

Bribes are benefits of any kind offered, promised or provided to gain any business, commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards, hospitality, offers of employment or other advantages. A bribe may not always be of large value and is not limited to payments of money.

Corruption is the abuse of entrusted power for private gain.

Bribery or corruption generally involve the improper influence of an individual in the performance of their duty, whether in the public or private sector. Serious criminal and civil penalties can be incurred by committing bribery or corruption. Both are serious offences, any suggestion of which can have a significant impact on the individuals involved, the MA Financial brand, reputation and profits.

5. Policy

5.1. Bribes

Employees must never give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly.

If employees are uncertain about whether something could be construed as a bribe, they should contact Legal & Compliance for guidance.

5.2. Gifts, hospitality and other benefits

All Group Employees must obtain Compliance's approval prior to accepting or giving any gift, hospitality or other benefit valued at AUD\$500 or more per person. Compliance will assess if it is appropriate to give, accept or decline the offer of a gift, hospitality or other benefit. Employees should never accept or give gifts, hospitality or other benefits valued at AUD\$500 or more without the express approval of Compliance. Employees also should not accept gifts, hospitality or other benefits on a recurring basis or broken down into parts of less than AUD\$500 without prior approval from Compliance. MA Financial recognises that the practice of giving and receiving business gifts varies between countries and cultures, so definitions of what is and is not acceptable will differ. Approval for benefits over the AUD\$500 threshold may be granted in appropriate circumstances, including for work related conferences and events. The details and the approval of gifts, hospitality and other benefits (including entertainment) valued at AUD\$500 or more are to be recorded in the Gifts and Entertainment Register.

a) Retail fund related gifts, hospitality and other benefits

Where a MA Financial entity provides financial services to retail clients under an Australian Financial Services Licence, dealings in relation to the receipt or provision of gifts, hospitality and other benefits are required to be undertaken in accordance with the Gifts, Hospitality & Other Benefits Policy – Retail (**Retail Gifts Policy**). The Retail Gifts Policy provides that any benefit valued at greater than \$300, and that relates to the provision to a retail client of financial product advice, is conflicted remuneration and is banned. It also provides that a Gifts Register must be maintained to record all benefits relating to the provision of financial product advice where the benefit is valued at greater than \$50. Approval must be obtained for any benefit that exceeds \$100 per person. Employees should liaise with Legal & Compliance to determine whether dealings are covered by the Retail Gifts Policy.

5.3. Dealings with government or public officials

Government or public officials include employees, officials or contractors of government, government bodies (including military and police) or government-controlled companies; members of the executive, legislature or judiciary; statutory officeholders; public international organisation employees and contractors; and, politicians (including candidates for office).

Employees may engage with governments, regulators and industry associations globally.

In dealings with government or public officials in Australia or overseas, Employees must obtain pre-approval from Compliance prior to accepting or giving any gift, hospitality or other benefit, of any value. In considering whether the benefit is appropriate, Compliance will apply the requisite due diligence checks prior to any approval being granted.

5.4. Facilitation payments

Facilitation payments are unofficial, low value payments to government officials or employees designed to expedite or facilitate routine government actions, e.g. processing licence applications, permits and other actions of a non-discretionary nature (i.e. which they are already bound to perform). The payment is not intended to influence the outcome of a government official's action, only its timing. MA Financial prohibits the use of facilitation payments. However, employees are permitted to use legitimate fast-track processes to expedite routine government actions of a minor nature, such as for processing visas. These processes are not classified as facilitation payments. Employees must never make such payments in cash, or that are unofficial, improper or irregular.

5.5. Political contributions

Political contributions include gifts, payments, loans or anything of value made to a political party, candidate or elected parliamentarian in federal, state or local government. They may also include attendance at fundraising events, such as a lunch or dinner, where one or more tickets are purchased.

MA Financial may make political contributions within Australia in an open and transparent manner and in compliance with all relevant federal and state laws. Donations must be approved by any one Joint Chief Executive Officer (or their delegate) and General Counsel. Receipt of approvals must be provided to Finance prior to payment by or on behalf of MA Financial. The Finance team must check that all donations, including tickets to fundraising events, have been pre-approved by the General Counsel, prior to any payments being made. Under New South Wales laws, due to MA Financial Group managed funds holding liquor and gaming licences, political donations to NSW politicians and political parties are not permitted. MA Financial discloses all political donations to the Australian Electoral Commission and state electoral authorities as required. Records of political contributions and necessary approvals are maintained in the relevant register.

Political contributions made on or behalf of MA Financial outside Australia are prohibited.

5.6. Charitable contributions

The MA Financial Foundation allows employees to support causes and charities of their choice. Charitable support and contributions are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial donations. However,

employees must be careful to ensure that charitable contributions are not used to facilitate or conceal bribery.

MA Financial can only make charitable contributions that are legal and ethical under local laws and practices. In Australia, this means that an organisation must have deductible gift recipient status with the Australian Taxation Office. This status makes the organisation entitled to receive income tax deductible gifts and deductible contributions.

No charitable contributions must be offered or made on behalf of MA Financial without the prior approval of the Chief Operating Officer. Records of charitable contributions and necessary approvals are maintained in the relevant register.

5.7. Offers of employment

Employees must not offer employment or similar opportunities at MA Financial to benefit:

- a) a government or public official (or their direct family member); or

an actual or potential client (or their direct family member),

without prior written authorisation from the Chief Operating Officer.

6. Third Parties

Third party means any individual or organisation that employees come into contact with during the course of their work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

In dealing with third parties, this Policy requires sufficient due diligence to be undertaken in respect of those third parties to ensure they are suitable to be associated with MA Financial, and that appropriate controls are implemented to prevent and detect bribery and corruption. This is to avoid the possibility of MA Financial engaging third parties at risk of committing bribery or a corrupt act on MA Financial's behalf or for which MA Financial may be responsible or otherwise liable.

7. Monitoring, Review, and Training

This Policy will be reviewed annually. MA Financial employees must complete training with respect to this Policy upon induction and annually thereafter.

8. Employee Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for MA Financial.

All employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy. Any employee who breaches this Policy will face disciplinary action, including potential termination of employment.

Employees must notify their Manager and Legal & Compliance as soon as possible if they believe or suspect that a conflict with, or breach of, this Policy has occurred, or may occur in the future.

