

# Group Anti-Bribery & Corruption Policy

## Rationale and Scope

The Group Anti-Bribery and Corruption Policy (the Policy) sets out your obligations in relation to anti-bribery and corruption control.

Our reputation, success and sustainability as an organisation depends on not only what we do, but how we do it. It is important for this reason that we always act with integrity and comply with applicable laws, regulations, codes policies and procedures relating to bribery and corruption control.

The Policy applies to Australia Post Group and all of its Workforce Participants worldwide.

## Policy Principles

Australia Post Group's anti-bribery and corruption principles expect all our Workforce Participants:

- are aware of their obligations relating to anti-bribery and corruption under applicable domestic and international laws.
- Will not engage in any conduct that constitutes bribery or corruption (including conduct that could be considered corrupt under the National Anti-Corruption Commission Act (2022).
- take steps to address any potential bribery or corruption issues they are aware of, including taking action and referring all suspected or alleged criminal behaviour to Australia Post Group Security, through the Whistleblower hotline (if preferred) or by making a voluntary referral to the National Anti-Corruption Commission where serious or systemic corruption issues are suspected.
- to never offer or accept bribes, pay-offs, facilitation payments (payments to speed up routine government transactions), secret, unjustified or inflated commissions, kickbacks or any other like payments or improper benefits to or from any person or entity (including Government Officials). This applies regardless of being offered directly or indirectly, the amount/value, legality or whether it is a common practice within a specific geographic territory.
- to ensure all third parties are aware that this policy applies to them when acting on behalf of the Australia Post Group and conduct adequate due diligence on bribery and corruption risks.
- to consider bribery and corruption as part of risk and compliance due diligence process for any merger, acquisition or divestment activity proportionate to the risk posed and consider this as part of the decision-making process.
- to only provide donations, grants and other funding to community and other not-for-profit organisations which have had adequate due diligence providing reasonable assurance that they are not a subterfuge for bribery and corruption (in addition to your obligations to comply with the Group Political Donations Policy).
- to maintain and keep accurate financial records as long as legally required and conduct responsible, ethical financial management.
- to ensure that adequate controls are in place across Australia Post Group to prevent bribery and corruption risks.

## Reporting

Suspected bribery or corrupt activity can be reported using one of the following options:

- Notifying your immediate manager or supervisor;
- contacting the Whistleblower hotline to speak anonymously (if preferred) to an independent, external service provider (as set out in the Group Whistleblower Policy and Our Ethics);
- contacting Group Security either in their local office or on the national number (as set out in Our Ethics), or
- directly notifying the Group Compliance Manager for Ethical Behaviour at [EthicalBehaviour@auspost.com.au](mailto:EthicalBehaviour@auspost.com.au);
- (in the case of corruption issues considered serious or systemic) notifying the Group Chief Executive Officer & Managing Director (or their delegate) or a Public Interest Disclosure Officer;
- (in the case of corruption issues considered serious or systemic) notifying the National Anti-Corruption Commission.

All suspected bribery or corruption cases must be escalated immediately and in accordance with the Group Incident Management Standard to ensure preservation and safeguarding of evidence. Anyone raising concerns or reporting another's wrongdoing in relation to suspected bribery or corruption issues will be supported. If concerns are raised in good faith under this policy, no employee will suffer demotion, penalty or other adverse consequences.

It is important to note that third parties may also refer serious or systemic corruption issues involving Australia Post to the National Anti-Corruption Commission.

## Glossary

Term	Definition
Australia Post Group	The Group means the Australian Postal Corporation, its domestic and foreign-owned subsidiaries, and all of its associated entities.
Bribery	<p>The Australia Post Group defines bribery as the offering, promising, giving, accepting or soliciting of an advantage (financial or otherwise) to induce an action by another entity which is illegal and/or amounts to a breach of trust and/or seeks to obtain an unfair advantage in business transactions. Examples of bribery could include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• facilitation payments (small payments to secure or expedite legal processes).</li> <li>• per diem payments to officials (daily rates of payment for the services of Government Officials, domestic or international).</li> <li>• receiving or being promised financial or non-financial benefits in return for improper performance of duties or abuse of power.</li> <li>• offer and/ or the payment of secret commissions (bribes or gratuities) in money, or some other value, to other businesses, individuals, or Government Official.</li> </ul>
Corrupt Conduct	<p>A person engages in corrupt conduct if:</p> <ul style="list-style-type: none"> <li>• they are a Public Official, and they breach public trust;</li> <li>• they are a Public Official, and they abuse their office as a Public Official;</li> <li>• they are a Public Official or former Public Official, and they misuse information they have gained in their capacity as a Public Official;</li> <li>• they do something that adversely affects a Public Official's honest or impartial exercise of powers or performance of official duties. (Any person can engage in this type of corrupt conduct, even if they are not a Public Official themselves).</li> </ul> <p>A person also engages in corrupt conduct if they try or plan to do any of those things. A Public Official's conduct may involve one or more types of corrupt conduct.</p>
Corruption	The Australia Post Group defines corruption as dishonest activity in which a director, executive, manager, employee or contractor of an entity acts contrary to the interests of the entity and abuses his/her position of trust in order to achieve some personal gain or advantage for him or herself or for another person or entity.
Corruption Issue	<p>A corruption issue is an issue of whether a person:</p> <ul style="list-style-type: none"> <li>• has engaged in corrupt conduct; or</li> <li>• is engaging in corrupt conduct; or</li> <li>• will engage in corrupt conduct.</li> </ul>
Facilitation payments	Typically, small unofficial payments made to secure or expedite a routine government action by a government official.

Term	Definition
Government Official	<p>Includes:</p> <ul style="list-style-type: none"> <li>people who are any of: elected or appointed officials, employees of state or local government institutions or associated government-owned organisations, representatives of international public organisations, political party officials or candidates for public office, members of royal families and any individual acting in an official capacity on behalf of a government, government agency or organisation; and</li> <li>a Public Official.</li> </ul>
Public Official	<p>Each of the following is a Public Official:</p> <ul style="list-style-type: none"> <li>Members and Senators of the Australian Parliament, including ministers, and the people who work for them;</li> <li>staff members of Commonwealth agencies including employees of Commonwealth government departments, Commonwealth companies and statutory bodies and contracted service providers (including consultants, independent contractors, labour-hire contractors, and others providing contracted services to the government);</li> <li>staff members of the NACC; and</li> <li>any person who is acting for and on behalf of, or as a deputy or delegate of, any person or body set out above.</li> </ul>
Workforce Participant	<p>Any employees of any company in the Australia Post Group, including our extended workforce of contractors, consultants, licensees, and agents (and their employees and subcontractors), who perform services for the Australia Post Group; and any other third parties performing services for or on behalf of the Group.</p>