

FRAUD, ANTI-BRIBERY AND CORRUPTION POLICY

A reputation for and commitment to honesty, integrity and trust is an essential of success and longevity in the investment industry. This policy aligns with the values of Abacus and the spirit of our Code of Conduct to always act with honesty and integrity. This policy should be read in conjunction with our Code of Conduct, Whistleblowing Policy, Supplier Code of Conduct, Human Rights Policy and Conflicts of Interest Policy.

Instances of fraud, bribery or corruption can have serious reputational damage for Abacus and can carry serious criminal and civil penalties for Abacus and the individual.

Abacus does not tolerate corrupt or fraudulent activity of any kind and employees must not engage in any unethical or improper payment practices either to obtain business or for personal gain.

1 WHAT IS FRAUD, BRIBERY AND CORRUPTION?

Fraud is wrongful or criminal deception intended to result in financial or personal gain.

Bribery and corruption is the giving (including gifts) or offering of a bribe for personal gain which results in dishonestly persuading someone to act one's favour. Bribery and corruption includes dishonest and fraudulent conduct.

2 WHAT ARE MY OBLIGATIONS?

Abacus does not tolerate corrupt or fraudulent activity of any kind and employees must not engage in any unethical or improper payment practices either to obtain business or for personal gain. Employees must not:

- engage in commercial bribery;
- be party to the bribery of public officials; or
- establish so called 'slush funds' or secret commissions to facilitate bribery or other improper or questionable practices.

As provided by the *Criminal Code (Cth)*, employees must not:

- make, alter, destroy or conceal an Accounting Document¹; or
- fail to make or alter an Accounting Document that they are under a duty to make or alter, with the intention that the conduct would facilitate, conceal or disguise;
 - the receipt or giving of a benefit that is not legitimately due;
 - a loss that is not legitimately incurred; or
 - regardless of whether the employee is reckless as to whether the benefit or loss would arise.

¹ 'Accounting Document' in this section means: any account, any account or document made or required for any accounting purposes, or any register under the *Corporations Act 2001 (Cth)*, or any financial report or financial record within the meaning of the *Corporations Act 2001 (Cth)*.



As part of its obligations under law, Abacus will fully co-operate with any investigation by law enforcement or regulatory authorities. It will also require that employees:

- do not make any disbursement of funds or other Abacus property without adequate supporting documentation, This includes ensuring that all appropriate payment authorisations are obtained in accordance with delegated authorities. There shall be no disbursement for any purpose other and as described in the documents;
- do not in furtherance of Abacus business make any direct or indirect personal payments to officials or employees of any government at any level by either Abacus funds or private funds;
- do not make any personal payments through Abacus accounts excluding payment of expenses which are later reimbursed to Abacus; and
- do not take any action or authorise any action which involves illegal, unethical or otherwise improper payment of money or anything else of value.

All employees are expected to be alert to, identify and fully cooperate in the event of an investigation into fraud, bribery and/or corruption.

3 GIFTS

Gift which could reasonably be regarded as influencing or giving personal gain to an employee should not be accepted and the Head of Compliance and Risk should be notified.

The Head of Compliance and Risk maintains a list of all gifts greater than \$500. An email should be sent to Head of Compliance and Risk to request approval be sought from the Managing Director prior to acceptance of any gift greater than \$500.

If an employee is unsure whether to accept a gift, the Head of Compliance and Risk should be notified and approval from the Managing Director is required prior to acceptance.

All gifts which involve travel, accommodation or store cards require approval in accordance with this policy.

4 POLITICAL DONATIONS

Political donations on behalf of Abacus of any kind are not allowed unless there is prior Managing Director or Board approval.

5 TRAINING

All staff will complete annual risk and compliance training which includes fraud, anti-bribery and corruption.

6 HOW DO I REPORT

Employees who believe they know of any fraud, corruption or irregular transactions, have a duty to raise that matter with their immediate supervisor or if an employee has previously reported a situation without satisfaction, wishes to remain anonymous and/or does not feel comfortable reporting to their immediate supervisor they can report to the internal whistleblower disclosure officer or email whistleblower@abacusproperty.com.au.

The organisation's Disclosure Officer to whom you may make a disclosure and their contact details are set out below.



Name and person	Contact details
Lesley Stradling Head of Compliance and Risk	Office tel: 02 9253 8609 lstradling@abacusproperty.com.au
Rob Baulderstone CFO/Company Secretary	Office tel: 02 9253 8670 rbaulderstone@abacusproperty.com.au
Paula Bauchinger People and Culture	Office tel: 02 9253 8682 pbauchinger@abacusproperty.com.au

An independent disclosure may also be made to an independent whistleblower service provider, Your Call. Further information can be found in our Whistleblowing Policy.

7 BREACHES

All material breaches of this policy will be reported to the Board in accordance with the procedures in the Breach Policy.

Related policies:

- Breach Policy
- Code of Conduct
- Whistleblowing Policy

ADOPTED: 17 February 2020
LAST BOARD REVIEW: 17 February 2020
COMPLIANCE AND RISK REVIEW: 17 February 2020