



# Global Anti-Bribery and Corruption Policy

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## 1. Objectives

Claim Central Consolidated Pty Ltd and its subsidiaries (together, **Claim Central**) is committed to conducting its business operations with integrity and strives to avoid even the appearance of impropriety in the actions of its officers, directors, employees and agents.

This Anti-Bribery and Corruption Policy (**Policy**) reiterates Claim Central's commitment to integrity and sets out Claim Central's expectations, obligations and requirements applicable to its operations under anti-corruption laws.

To the extent that laws and regulations in any countries are more rigorous or restrictive than this Policy, those laws and regulations should be followed by any subsidiary or Claim Central Personnel operating in that country. Claim Central may, from time to time, provide country-specific directions for subsidiaries operating in countries outside of Australia.

This Policy highlights the serious criminal and civil penalties that may be incurred and reputational damage that may be suffered by Claim Central if it is involved in bribery or corruption. Accordingly, this Policy contains information intended to reduce the risk of corruption and bribery from occurring within Claim Central.

This Policy does not form part of any Claim Central Personnel's contract of employment. Claim Central may amend, replace or remove this Policy at any time.

## 2. Scope

This Policy applies to Claim Central's operations worldwide. All persons working for Claim Central, including all employees, directors, and officers, agents as well as any other third-party representatives that conduct activities on behalf of Claim Central including any contractors, external consultants, third-party representatives and business partners (**Claim Central Personnel**) are covered under this Policy.

## 3. What is Bribery and Corruption?

A **bribe** is a financial payment, promise or other inducement or reward for action, which is illegal, unethical, a breach of trust or improper in any way to obtain or retain business or to secure any improper advantage. Bribes can take the form of money, gifts, loans, fees, hospitality, services, the award of a contract or any other advantage or benefit.

**Bribery** is the act of offering, promising, giving, accepting or seeking a bribe. Bribery can be indirect, for example:

- A person procures an intermediary or an agent to make an offer which constitutes a bribe to another person.
- An offer which constitutes a bribe is made to an associate of a person who is sought to be influenced.

**Corruption** is a wrongdoing on the part of an authority or powerful party through means that are illegitimate, immoral, or incompatible with ethical standards or abuse of entrusted power or position for private gain.

All forms of bribery and corruption are strictly prohibited. If you are unsure about whether an act constitutes bribery or corruption, raise it with your Line Manager or the General Counsel and Company Secretary.

## 4. Laws relating to Bribery and Corruption

Claim Central is committed to complying with all laws of each jurisdiction in which Claim Central Personnel do business, including all laws relating to bribery and corruption. There are laws prohibiting bribery and corruption in each country in which Claim Central operates including Australia, New Zealand, United States and South Africa. These laws impose serious criminal and civil penalties for offences under them, including criminal convictions and, for individuals, imprisonment. Some of these laws, such as the *Australian Criminal Code Act 1995* (Cth) and the United States' *Foreign Corrupt Practices Act* have extra-territorial reach. This means that, for example, a citizen of Australia or another country may be prosecuted in Australia or the United States, even where the relevant activity occurred entirely overseas.

## 5. Prohibited Payments

Claim Central Personnel are prohibited from directly or indirectly making, promising, authorising or offering anything of value to a government official on behalf of Claim Central to secure an improper advantage, obtain or retain business or direct business to any other entity. This prohibition includes payments to third parties where the Claim Central Personnel knows, or has reason to know, that the third party will use any part of the payment for bribes. This prohibition also includes payment of a secret commission to any person acting in an agency or fiduciary capacity on behalf of a government official.

### **Cash and Non-Cash Payments**

Payments that violate applicable anti-corruption laws may arise in a variety of settings and include a broad range of payments beyond the obvious cash bribe or kickback. Generally, payments means anything of value. Examples of “payments” include, but are not limited to:

- Gifts;
- Travel, meals, lodging, entertainment or gift cards;
- Loans or non-arm’s length transactions;
- Charitable or political donations; and
- Business, employment or investment opportunities.

### **Government Official**

A government official includes anyone, regardless of title, who is:

- Engaged in public duty in a government agency whether elected or appointed, and at any level of government including local, state or federal government entities;
- A member of any legislative, administrative or judicial body;
- A candidate for political office;
- An officer or employee of, or someone acting in an official capacity for, a government agency, government-owned or government-controlled entity, including state-owned entities that operate in the commercial sector;
- An officer or employee of a public international organisation, such as the United Nations; or
- Anyone acting on behalf of any of the above.

Claim Central prohibits all Claim Central Personnel from making facilitation payments.

Facilitation payments are unofficial payments made either directly or indirectly to Government Officials to speed up or secure the performance of a government decision or action that is routine or would have been made or occurred in the ordinary course.

### **Claim Central Personnel Obligations**

Claim Central Personnel must not, at any time:

- Give or offer any payment, gift, hospitality or other benefit expecting that a business advantage will be received in return, or to reward any business received;
- Accept any offer from a third party that you know, or suspect is made with the expectation Claim Central will give a business advantage to them or anyone else;
- Give or offer any payment, gift, hospitality or other benefit to a government official in any country for any reason, including any payments (sometimes called “facilitation payments”) to facilitate or speed up a routine or necessary procedure;
- Accept unduly lavish or extravagant hospitality;
- Accept or offer any adult entertainment as hospitality;
- Take any negative action against anyone who has refused to offer or accept a bribe or who has raised a concern about possible bribery or corruption; or
- Do or refrain from doing anything that could be considered or perceived as a conflict of interest.

If you are asked to make a payment on the Claim Central’s behalf, you should consider what the payment is for and whether the amount is proportionate to the goods or services provided. You must always obtain a receipt.

## 6. Permitted Payments

In recognition of the fact that there are legitimate reasons for the giving or receipt of gifts and business-related hospitality, certain nominal payments or gifts to government officials may be excluded by applicable laws, including but not limited to promotional hospitality expenses, marketing expenses, expenses made pursuant to a contract or promotional gifts provided as a courtesy or extension of goodwill. This Policy does not prohibit the giving or accepting of reasonable and appropriate gifts or hospitality.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as a conflict of interest, an inducement or reward for any preferential treatment e.g. during contract negotiations or a tender process.

Gifts you give must be of an appropriate type and value depending on the circumstances and taking into account the reason for the gift. It must not include cash or equivalent e.g. vouchers or be given in secret. All gifts must be given in Claim Central's name. Any gift or hospitality must be lawful and in accordance with generally accepted business practices of the governing jurisdiction.

Promotional gifts of low value, such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

You must declare any hospitality or gifts given or received and seek approval prior to giving or accepting gifts from the appropriate Approver below.

Amount in local currency (per person)	Approver
Amounts over 100	Line Manager
Amounts between 200 and 300	Head of region
Amounts over 300	General Counsel and Company Secretary

You must record all gifts or hospitality received or you intend to offer and provide it to the Approver. The Approver must then provide it to the General Counsel and Company Secretary, who will add it to the Gifts and Benefits Register.

## 7. Donations

Claim Central does not make contributions or donations to political parties or any individual candidates seeking a governmental office.

Claim Central Personnel must not (on a professional basis or in any way related to their employment or otherwise in connection with Claim Central):

- Attend political conferences or state dinners or other events run by political parties; or
- Directly or indirectly make cash donations to any local, state or federal government party.

All charitable donations made on behalf of Claim Central must be pre-approved by the Global CEO.

## 8. Record Keeping and Reporting

It is Claim Central's policy to retain financial records and implement sound internal accounting controls. All accounting entries in Claim Central's books and records must be timely and accurately record, with reasonable detail, to fairly reflect transactions and include supporting documentation.

Claim Central Personnel must:

- Obtain authorization for all transactions involving the provision of anything of value to a government official;
- Report all transactions involving the provision of anything of value to a government official to Finance;
- Declare any potential conflicts of interest to the General Counsel and Company Secretary; and
- Submit all expense claims relating to hospitality, gifts or payments to third parties including the reason for expenditure.

All accounts, invoices and other records relating to dealings with third parties including suppliers and customers should be accurate and complete. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

## 9. How to Raise a Concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this Policy has occurred or may occur, you must notify the Head of People & Advancement or the Chief Financial Officer or the General Counsel and Company Secretary or report it in accordance **with Claim Central's Whistleblower Policy** as soon as possible.

Breaches of this Policy will be taken very seriously. A breach of this Policy may result in disciplinary action, which could include dismissal. It is each person's responsibility to understand how this Policy applies to you.

If local laws, codes of conduct, or other regulations in a country or region are more restrictive than this Policy, then any Claim Central Personnel, including any subsidiaries operating in that country or region must fully comply with the more restrictive requirements.