

Anti-bribery and Corruption Policy

One Investment Group

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1. Application of Policy

- 1.1. This policy applies to each entity within the One Investment Group (which includes each OIG Licensee¹) and to all OIG Staff.
- 1.2. This policy is not intended to anticipate every situation in which bribery or corruption may arise. OIG's Staff are expected to use their common sense and sound judgement to ensure all OIG's financial services are provided efficiently, honestly and fairly.
- 1.3. One Investment Group may require an investment manager or other client to adopt this policy where it does not have a similar policy of its own.

2. Purpose of Policy

- 2.1. One Investment Group considers having an Anti-Bribery and Corruption policy:
 - (a) demonstrates OIG's 'no-tolerance' position in respect of any bribery or corruption in its business interests or the business interests of its associates which includes dealings with other businesses and governments (whether local, state; federal or international);
 - (b) demonstrates its commitment to ensuring appropriate controls are in place which set out OIG's requirement for all staff to adhere to in relation to the management of gifts and benefits; and
 - (c) reinforces the high standards of integrity and fair dealing underpinning OIG's values and what OIG expects from its Staff in order to protect and minimise any adverse impact on both Staff and OIG's reputation.

3. What is bribery, corruption and facilitation payments?

What is bribery?

- 3.1. Bribery is any offering, giving, promising, receiving, accepting or soliciting (either directly or indirectly) of anything of value as an inducement for an action of any person, whether in the private or public sector, which is illegal, unethical or involves a breach of trust in order to gain or retain an advantage in the course of business. The advantage can be commercial, regulatory or personal in nature.
- 3.2. A bribe is an inducement or reward of anything of value such as cash, gifts, hospitality, fees, loans, rewards, reciprocal favours, business or employment opportunities, political or charitable contributions and a range of other direct or indirect benefits. A bribe can also take the form of any 'kickback arrangement' or 'secret commission' in the form of money, gifts, preference, privilege or anything of value that alters or is intended to alter the behaviour of the recipient.

What is corruption?

- 3.3. Corruption is the abuse of entrusted power, including the abuse of public office or power, for private gain. It is not limited to business dealings with a government and may include the

¹ S.1317AAB Corporations Act 2001

misuse of private power in non-governmental business dealings.

What is a facilitation payment?

- 3.4. A facilitation payment is any payment (no matter how large) made for the purpose of securing or expediting the performance of a routine government action. It is a form of bribery and corruption.

4. Anti-bribery and Corruption Policy

- 4.1. One Investment Group will not provide or receive anything of value specifically with the expectation of receiving a favourable decision or special treatment across any of its dealings with other businesses and governments (whether local, state, federal or international).

No bribes

- 4.2. OIG Staff must not, either directly or indirectly, offer, give, authorise, request or receive bribes. A bribe does not actually have to take place – the promise to give or agreeing to receive a bribe is also prohibited.

No facilitation payments

- 4.3. One Investment Group will not offer facilitation payments. If an OIG Staff member receives a request from a third party for a facilitation payment, that staff member must immediately report this to the Compliance Manager.

Political and charitable contributions

- 4.4. OIG Staff must consider the ramifications for OIG, its clients and its Funds before making a donation to any cause, charity or political party. While Directors and Officers of an OIG company must not make donations to any political party, all other political and charitable contributions of greater than \$1,000 must be approved by CEO and Director, Legal & Compliance on a case by case basis (and will be disclosed in accordance with legislative requirements).

Gifts and Benefits

- 4.5. OIG Staff must not seek, accept, offer or give (directly or indirectly) any payments, fees, loans, services or gifts from or to any person or other business entity as a condition of, or result of, doing business with them that could affect their judgement or give rise to a conflict of interest. In order to avoid the perception that a gift or other benefit could affect their judgement, OIG Staff must not seek, accept, offer or give (directly or indirectly) any significant benefit without the prior approval of their Manager.
- 4.6. OIG Staff must report to the Compliance Manager the provision or receipt of any Significant Benefit for the Compliance Manager to record in the Gifts and Benefits Register.
- 4.7. If an OIG Staff member is offered or receives any gift or invitation that doesn't meet these standards, you should refuse politely and explain our policy on Gifts and Benefits.
- 4.8. If an OIG Staff member is unsure of whether providing or receiving a gift or benefit is within

the accepted ethical boundaries as set out in this policy, they must consult with the Compliance Manager or the Director Legal & Compliance.

5. Reporting Bribery and Corruption

- 5.1. Serious criminal and civil penalties may be incurred by OIG or OIG Staff personally if you are involved in bribery or corruption (including making or offering any facilitation payment).
- 5.2. OIG is committed to ensuring that all OIG Staff have a safe, reliable and confidential way of reporting any suspicious activity. If you have any concerns or are unsure whether a particular act constitutes bribery or corruption, you are encouraged to raise these issues with your Manager or any member of the Compliance Team at the earliest possible time.
- 5.3. Subject to paragraph 5.5 below, OIG Staff must report to the Director, Legal & Compliance:
 - (a) any suspected or actual instances of bribery or corruption; and
 - (b) where they know or suspect another member of staff is in breach of this policy including having failed to report bribery or corruption.
- 5.4. Subject to paragraph 5.5 below, the Director, Legal & Compliance will report to the relevant Board any information received in relation to bribery or corruption.
- 5.5. All requests for advice on what constitutes bribery or corruption will be dealt with confidentially and your report may attract the protection described in OIG's *Whistleblower Policy*.

6. Training and Compliance

- 6.1. The implementation of (including training on) and monitoring of compliance with this policy is undertaken in accordance with OIG's *Compliance Management Systems Framework*.
- 6.2. Compliance with this policy is mandatory and any actual non-compliance must be reported and assessed through the normal incident/ breach reporting process. Any deliberate act of non-compliance by any employee may result in disciplinary action.

7. Review of Policy

This policy will be reviewed at the intervals and in the manner described in OIG's *Compliance Management Systems Framework*.

8. Other relevant OIG Policies

In addition to the *Compliance Management Systems Framework*, other relevant OIG policies are the:

- (a) *AML/CTF Policy*;
- (b) *Conflicts of Interest and Related Party Transaction Policy*;
Code of Conduct; and
- (c) *Whistleblower Policy*.

9. Dictionary and Interpretation

- 9.1. In this policy, a reference to a person performing an act, for example *Director, Operations*, that person may delegate the performance of the relevant act to another, for example *Manager, Operations* provided they adequately supervise their delegate.
- 9.2. In addition to the terms defined in the Compliance Management Systems Framework, when used in this policy, the following capitalised terms have the meanings set out below:

Term	Meaning
significant benefit	<p>Is any goods, services or other benefits that are indicative of significant worth and includes:</p> <ul style="list-style-type: none"> (i) Loans of any amount (ii) Paid travelling expenses of greater than \$300 (iii) Receiving or presenting gifts of more than \$300 (iv) Receiving or providing entertainment that is unreasonable in the circumstances (v) Receiving or paying a secret commission (vi) any other gift, benefit or service of \$300 or above