

# Anti-Bribery and Corruption

January 2025

---

# Contents

- 1. Purpose ..... 3
- 2. Scope..... 3
- 3. Policy Requirements..... 3
  - 3.1 General Obligations..... 3
  - 3.2 Bribery ..... 3
  - 3.3 Corruption..... 3
- 4. Managing Anti-Bribery and Corruption risks ..... 4
  - 4.1 Facilitation Payments ..... 4
  - 4.2 Gifts and Entertainment..... 4
  - 4.3 Political Contributions ..... 4
  - 4.4 Reporting Bribery and Corruption..... 4
- 5. Related Policies ..... 5

---

## 1. Purpose

The purpose of the Anti-Bribery and Corruption (“ABC”) Policy (“Policy”) is to outline the scope and principles that define Perpetual’s approach to identifying, managing, and mitigating bribery and corruption risk and complying with ABC laws and regulations in the jurisdictions in which we operate.

## 2. Scope

The Policy applies to all Staff of Perpetual Limited (“Perpetual”) and its subsidiaries.

## 3. Policy Requirements

Perpetual is committed to conducting its business in accordance with the highest ethical and legal standards. Bribery and Corrupt Practices will not be tolerated by Perpetual under any circumstances.

### 3.1 General Obligations

Perpetual and our Staff share a collective commitment to act professionally, fairly and with integrity at all times. All Perpetual Staff are expected to comply with the applicable ABC laws and regulations that apply within their jurisdiction. All Staff are prohibited from engaging in any form of actual or perceived Bribery or Corruption.

All Staff should:

- Understand and comply with this policy and any related policies, procedures, or guidance;
- Promptly report any suspected or actual incidents or Bribery or Corruption; and,
- Promptly report any requests for Bribes, including Facilitation Payments.

### 3.2 Bribery

Bribery means providing, promising to provide, or causing the provision of a Benefit to a Public or government Official, either foreign or domestic, or other individual, including their family members or close associates, with the intention of influencing the person’s views or conduct in order to obtain or retain business or an improper business advantage.

A Benefit may be both financial or non-financial advantages, including, but not limited to:

- Cash or in-kind payments;
- Gifts, entertainment, travel, or hospitality;
- Business or employment opportunities;
- Sponsorships, political, charitable, or community contributions; and,
- Refraining from exercising rights, powers, or duties.

A Bribe could be provided directly or indirectly, including the payment of Facilitation Payments. The Benefit does not need to be successful in improperly influencing the other person. The relevant consideration is whether the intention of the person providing the Benefit.

### 3.3 Corruption

Corruption (and Corrupt Practices) is the misuse of public power and can take many forms, but it will always involve the abuse of a position of trust, authority, or employment to achieve a personal or business advantage. It can include your own actions as well as requesting or inducing others to engage in Corruption.

---

## 4. Managing Anti-Bribery and Corruption risks

To combat Bribery and Corruption, Perpetual is responsible for implementing robust measures and adequate procedures appropriate to the size and nature of its business, including the products and services.

### 4.1 Facilitation Payments

Facilitation Payments are Benefits or payments provided to a Public Official, including their family members or close associates, with the intention of expediting, securing, or otherwise facilitating the performance of a routine government action or service.

Facilitation Payments are prohibited by Perpetual and must not be paid under any circumstances. This prohibition applies to jurisdictions where their payment may be legal or common practice.

Refer to the **Perpetual Limited Joint AML/CTF Program** (or equivalent for overseas subsidiaries) for details on how Perpetual identifies, mitigates and manages political exposed persons<sup>1</sup>, and bribery and corruption risks.

### 4.2 Gifts and Entertainment

Perpetual's **Gifts and Entertainment Policy** prohibits Staff from giving or receiving gifts and entertainment that may, or are intended or perceived to, improperly influence them or others. The prohibition extends to situations where an actual or perceived conflict of interest may exist.

Gifts and Entertainment given to or received from Public Officials present higher risks for Bribery and Corruption. Staff should exercise additional care and diligence when Gifts and Entertainment are given to or received from Public Officials, to ensure no perceived or actual Bribery or Corruption is involved.

When in doubt, staff should consult their local Compliance partners to ensure Gifts and Entertainment comply with our policy and are otherwise appropriate.

### 4.3 Political Contributions

Perpetual's policy is that it does not make Political Contributions. Whilst Staff are prohibited from making Political Contributions at any time on behalf of Perpetual or in their capacity as Perpetual Staff, this does not prohibit Staff from making Political Contributions, in compliance with relevant legislation, in their personal capacity.

Political Contributions by Staff are subject to restrictions, disclosure and approval requirements that vary by jurisdiction. Before making any Political Contribution, staff should consult their local Compliance partners to ensure the contribution is appropriately approved and disclosed.

In the case of charitable donations made to a community organisation and is part of a referendum that are made by Perpetual, the donation should be registered as a referendum donation as required by the Australian Electoral Commission.

### 4.4 Reporting Bribery and Corruption

Staff must report all suspected or actual instances of Bribery or Corruption, including unsuccessful attempts, to their people leader and local Compliance partners.

People leaders and local Compliance partners who receive a staff report must promptly escalate the report to Group Compliance.

---

<sup>1</sup> [Politically exposed persons, corruption and foreign bribery: strategic analysis brief | AUSTRAC](#)  
Page 4 of 6 | Anti-Bribery and Corruption

---

Staff who wish to remain anonymous should report any suspected or actual instance of Bribery or Corruption through the appropriate local whistleblower hotline.

Perpetual is committed to protecting those who report wrongdoing, including Bribery and Corruption. Staff who speak up will be protected from victimisation or other retaliatory behaviour. Staff should refer to the **Whistleblowing Policy** for further information.

Failure to comply with this Policy may result in criminal, civil, or regulatory penalties for Perpetual or Perpetual Staff. Staff may also be subject to disciplinary action, up to and including possible termination of employment.

Suspected or actual breaches of this Policy must be managed in accordance with Perpetual's Issues Management Policy.

If found to be liable, the penalty relating to foreign bribery law in Australia is as follows:

1. Individuals: no more than 10 years imprisonment, 10,000 penalty units fine, or both.
2. Body corporate:
  - a. 100,000 penalty units (equivalent to \$31.3 million as of 1 July 2023)
  - b. Penalties of three times the value of the Benefit directly received or indirectly obtained through bribery
  - c. Additional penalties of up to 10 per cent of the corporation's annual turnover if the court cannot determine the value of the Benefit acquired.<sup>2</sup>

Perpetual also risks reputational and brand damage through any offences committed or alleged.

Perpetual will report Bribery and Corrupt Practices to the relevant law enforcement agencies and regulators in accordance with our obligations under the law.<sup>3</sup>

## 5. Related Policies

- Code of Conduct
- Gifts and Entertainment (Australia)
- Conflicts of Interest (Australia)
- Whistleblowing
- Issues Management
- Perpetual Limited Joint AML/CTF Program

---

<sup>2</sup> Under section 70.2 of the [Federal Register of Legislation - Criminal Code Act 1995](#)

<sup>3</sup> In Australia, referrals are made to the National Anti-Corruption Commission - [How to make a referral to the NACC | Attorney-General's Department \(ag.gov.au\)](#)

## 6 Definitions

Term	Definition
Perpetual	Perpetual Limited and its subsidiaries
Staff	An employee, director, contingent work (temps, contractors, and consultants), or representative of Perpetual
Bribe or Bribery	Has the meaning set out in section 3
Corruption and Corrupt Practices	Has the meaning set out in section 3
Benefit	Has the meaning set out in section 3
Facilitation Payment(s)	Has the meaning set out in section 4
Public Official(s)	Includes: <ul style="list-style-type: none"><li>▪ an elected or appointed official, employee or representative of a foreign or domestic government, including administrative, executive, legislative, military or judicial branches of government;</li><li>▪ officials or candidates of a political party;</li><li>▪ employees and directors of government-controlled or government funded entities; or</li><li>▪ officials of public international organisations and persons acting on their behalf e.g. United Nations, World Bank.</li></ul>
Political Contribution(s)	Include monetary and non-monetary payments to, or for the Benefit of: <ul style="list-style-type: none"><li>▪ A political party;</li><li>▪ Any government department or agency;</li><li>▪ A sitting official, or candidate for office, at any level of government or their staff.</li></ul>
Gift(s) and Entertainment	Has the meaning set out in Perpetual's Gifts and Entertainment Policy

---

## About Perpetual

Perpetual Limited (“Perpetual”) is an ASX listed (ASX:PPT) global financial services firm operating a multi-boutique asset management business, as well as wealth management and trustee services businesses.

Perpetual owns leading asset management brands including Perpetual, Pental, Barrow Hanley, J O Hambro, Regnan, Trillium and TSW.

Perpetual’s wealth management business services high-net worth clients, not for profits, and small businesses through brands such as Perpetual Private, Jacaranda Financial Planning and Fordham.

Perpetual’s corporate trust division provides services to managed funds, the debt market and includes a growing digital business, encompassing Laminar Capital.

Headquartered in Sydney, Perpetual services its global client base from offices across Australia as well as internationally from Asia, Europe, the United Kingdom and United States.

[perpetual.com.au](https://perpetual.com.au)