

Fraud, Anti-Bribery and Corruption Policy

Purpose and scope

Endeavour Group is committed to conducting business in an honest and ethical manner, and maintaining a high standard of integrity. We are committed to acting fairly and honestly in all dealings with our customers, teams, suppliers, partners and our communities. This policy sets out Endeavour Group's principles and requirements in relation to fraud, bribery, and corruption, facilitation payments, charitable donations, political donations, and the investigation and reporting of such matters. This policy forms part of Endeavour Group's wider policy framework which includes Endeavour Group's Code of Conduct.

This policy applies to all of Endeavour Group including all Team Members and all Partners of Endeavour Group. For the purposes of this policy:

- "Team Members" includes all employees, contractors and directors; and
- "Partners" includes all vendors, suppliers, service supplier agencies, consultants, agents and other third parties,

who work for or with Endeavour Group Limited or any of its related entities anywhere in the world.

If travelling or based outside of Australia, Team Members and Partners are subject to the laws of the country they are in. However, the principles of this policy must be followed regardless of whether that country has specific fraud, anti-bribery and corruption laws. Where a country has fraud, anti-bribery and corruption laws which are of a lesser standard to this policy, this policy prevails.

Policy requirements

Principles

- We want our relationships with Partners to be a positive point of difference for Endeavour Group and to be a reflection of our core values.
- We are committed to complying with laws and regulations addressing fraud, bribery and corruption in each country in which we conduct business.
- Fraud, bribery and corruption are serious criminal offences that can have a significant impact on the individuals involved, our brand, reputation and profits.
- Individuals must not knowingly commit, be a party to, or be otherwise involved in fraud, bribery or corruption.
- We will not do business with any organisation that engages in fraud, bribery or corruption.

Requirements

| FRAUD | |
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| <p><i>What is fraud?</i></p> <p>Fraud is dishonest activity that leads to obtaining a personal benefit or causing a loss through deception. It can include forgery, money laundering, irregular payments or commissions, misuse of company or customer information, theft or misappropriation of cash or stock, company credit card or asset misuse and falsifying accounting records.</p> | <p><i>What are Endeavour Group's requirements?</i></p> <ul style="list-style-type: none"> • Team Members must immediately disclose any personal financial interest in a contract made for or on behalf of Endeavour Group, or with Endeavour Group, to Endeavour Group's <u>FABC Officer</u> (details below) and/or relevant <u>Endeavour Group ExCo member</u>. Any such personal financial interest should be logged in the <u>FABC Register</u>. • If Team Members become aware of potentially fraudulent activities they should follow the reporting process outlined in the 'Investigation and Reporting' section below. • Team Members are expected to operate with integrity and comply with Endeavour Group's policies and procedures addressing the handling of goods, financial accounts, payments and information with respect to record keeping. Team Members are expected to undertake e-learning and provide relevant attestations as required. |
| BRIBERY AND CORRUPTION | |
| <p><i>What is bribery and corruption?</i></p> <p>Bribery is the offering, promising, authorising, giving, accepting or soliciting of a bribe to influence someone in government or business either in their personal or official capacity, to obtain or retain a business or personal advantage. A <u>bribe</u> is a benefit of any kind offered, promised or provided to gain any business, commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards, hospitality, offers of employment or other advantages. A bribe may not always be of a large value and is not limited to the payment of money; it could be a lunch or an</p> | <p><i>What are Endeavour Group's requirements?</i></p> <ul style="list-style-type: none"> • Team Members and Partners who work for or with Endeavour Group should never give, offer or accept bribes, to persuade someone to act in Endeavour Group's favour, their favour or for the benefit of a third party, including business partners, family or friends. • Organisations and individuals doing business with Endeavour Group (including Partners) should never offer a bribe, improper payment or gift to an Endeavour Group Team Member or anyone working for or on behalf of Endeavour Group. • Team Members may engage with governments, regulators, NGOs and industry associations across the world in the ordinary course of business and in compliance with this policy and other relevant policies including the Gifts & Entertainment Policy. • If there is any doubt, obtain prior written approval from the <u>FABC Officer</u> and/or relevant <u>Endeavour Group ExCo member</u>. • If a Team Member is offered a bribe it is expected that they decline the offer and report the matter to their line |

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| <p>invitation to a sporting event.</p> <p>Corruption is the abuse of entrusted power for private gain.</p> <p>Bribery and corruption are serious offences and can result in criminal and civil penalties.</p> | <p>manager, Culture & People, or through our confidential whistleblowing service Endeavour Whistleblowing (see the 'Investigation and Reporting' section below).</p> |
| FACILITATION PAYMENTS | |
| <p><i>What are facilitation payments?</i></p> <p>Facilitation payments are low value payments to Government or Public Officials to speed up or facilitate routine governmental actions of a minor nature. <u>Government or Public Officials</u> include employees, officials or contractors of government bodies (including military and police) or government-controlled companies, members of the executive, legislature or judiciary, statutory officeholders, public international organisations employees and contractors, and politicians (including candidates for office).</p> | <p><i>What are Endeavour Group's requirements?</i></p> <ul style="list-style-type: none"> • Endeavour Group prohibits the payment of facilitation payments. • Team Members are permitted to utilise legitimate fast-track processes to expedite routine government action of a minor nature which are permitted by law in the relevant jurisdiction, such as for visas. All such payments (excluding payments to expedite visas) must be logged in the <u>FABC Register</u>, as soon as practicable and in any event within 5 business days, with a receipt detailing the value, date and circumstances of the payment. • If there is any doubt as to whether a payment is permissible, obtain prior written approval from the <u>FABC Officer</u> and/or relevant <u>Endeavour Group ExCo Member</u>. • Team Members must never make payments in cash or payments that are unofficial, improper or irregular, either directly or indirectly to Government or Public Officials in order to secure a permit, licence or accelerate any other decision from any Australian or foreign government agency. If there is any doubt, obtain prior written approval from the <u>FABC Officer</u>. • Partners must never make payments on behalf of Endeavour Group in cash or payments that are unofficial, improper or irregular, either directly or indirectly to Government or Public officials, including any government agency. |
| POLITICAL DONATIONS | |
| <p><i>What are political donations?</i></p> <p>Political donations are support and contributions made to political organisations including direct financial donations and fees for</p> | <p><i>What are Endeavour Group's requirements?</i></p> <ul style="list-style-type: none"> • Engagement between business and government, when underpinned by shared values and clear guidelines, is a healthy and important part of our democratic process. As part of that engagement Endeavour Group invites |

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| <p>any event, function, forum or subscription.</p> <p><u>Political organisations</u> are any political party, or any third party campaigners such as community bodies engaged in political activity.</p> | <p>politicians to visit our stores and other facilities and we participate in other relevant political engagement and policy discussions.</p> <ul style="list-style-type: none"> ● It is, however, an area that requires strong governance and oversight in order to protect Endeavour Group's reputation as an ethical and responsible organisation and to ensure compliance with federal, state and local government political donations laws and regulations. ● Without prior written approval from Endeavour Group's <u>Head of External Affairs</u>: <ul style="list-style-type: none"> ○ Team Members (other than directors and "officers") and Partners must not make political donations to or for political organisations, for or on behalf of Endeavour Group - this does not apply to persons (other than directors and "officers") personally engaging in political activity, or making political donations in a wholly personal capacity (i.e. ensuring complete independence from Endeavour Group), subject to all relevant laws; and ○ directors and "officers" of any Endeavour Group entity must not make political donations to or for political organisations, for any reason (including personally) - an "officer" of an Endeavour Group entity or related entity (50% shareholding or more) includes a director, and any person in a senior management position, of that entity; in some states, "officers" of an entity (and their spouses) may be prohibited donors in their personal capacity. |
| CHARITABLE DONATIONS | |
| <p><i>What are charitable donations?</i></p> <p>Charitable donations are support or contributions made to charitable organisations, whether in-kind services, knowledge, time or direct financial donations.</p> <p><u>Charitable organisations</u>, in Australia, include organisations that have deductible gift recipient (DGR) status with the Australian Taxation Office, such as a charity, but may also include a national or state based organisation or local community group that does not have DGR status but provides</p> | <p><i>What are Endeavour Group's requirements?</i></p> <ul style="list-style-type: none"> ● Endeavour Group can only make charitable Donations that are legal and ethical under local laws and practices. ● Team Members and Partners must be careful to ensure that Charitable Donations are not used to facilitate or conceal bribery. ● Please see the latest <u>Gifts & Entertainment Policy</u> of Endeavour Group for more details. |

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| <p>services to the communities that it serves and the charitable donation is made by Endeavour Group in furthering the work of that organisation or community group in a community in which the Endeavour Group operates.</p> | |
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Investigation & Reporting

Endeavour Group will always review, investigate and take action where fraud, bribery or corruption is identified, reporting matters to the appropriate authorities as required.

- Endeavour Group's FABC Officer is appointed to provide oversight and advise the business so that fraud, bribery and corruption risks are identified, assessed and all instances of impropriety are investigated.
- Endeavour Group's FABC Officer maintains a FABC Register and relevant matters set out in this policy should be recorded in this register.
- We have established multiple channels to report suspected incidents of fraud, bribery or corruption.
 - Team Members are expected to promptly raise issues of suspected breaches to either:
 - their line manager;
 - People & Culture; or
 - through our confidential whistleblowing service, Endeavour Whistleblowing;
 - Partners are expected to promptly raise issues of suspected breaches of this policy through our confidential whistleblowing service, Endeavour Whistleblowing.

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| FABC Officer | Head of Risk and Compliance Email: compliance@edg.com.au (Attn: FABC Officer) |
| Endeavour Whistleblowing | Telephone: 1800 952 910 Online: www.endeavourwhistleblowing.deloitte.com.au |

Policy compliance

Breach of this policy

- Compliance with this policy is mandatory.
- Those within scope of this policy are responsible for complying with this policy and all applicable laws and regulations worldwide.
- Team Members must also take reasonable steps to ensure that contracted Partners and any other third parties and associates are aware of and comply with this policy, and understand that compliance with this policy is a condition of our continued engagement with them.
- Any identified conflict between this policy and relevant laws or regulations is to be referred to the FABC Officer as soon as practicable.

- A breach of this policy by a Team Member may result in disciplinary action, termination of employment or criminal prosecution and may have serious consequences for all parties involved. See also Endeavour Group's Code of Conduct.

Related documents

Legislation/regulations

Various

Internal documents

Code of Conduct
 Gifts and Entertainment Policy
 other relevant policies, frameworks and standards

Policy governance

| Document Type | Approver | Reviewer | Owner | Exception Authority | Review Cycle |
|---------------|----------|----------|---------------------|---------------------|--------------|
| Group Policy | ARCMC | CEO | Chief Legal Officer | CEO | Annually |

Contact

compliance@edg.com.au

Material policy revisions

| Version | Approval Date | Effective Date | Details |
|---------|---------------|----------------|------------|
| 1.0 | 21/06/2021 | 23/06/2021 | New policy |