

## 1.0 Overview

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### 1.1 Introduction

This Anti-Bribery and Corruption Policy and Gifts and Entertainment Policy (Policy) sets out the procedures with which staff (as defined in Part 1.3) of Angle Auto Finance Pty Ltd (Angle Auto Finance), trading as “Angle Auto Finance”, must comply in relation to:

- anti-bribery and corruption-related issues (in Part 2); and
- the offering, provision or receipt of gifts and entertainment (in Part 3).

### 1.2 Purpose

Angle Auto Finance has a zero-tolerance policy towards bribery and corruption. It is committed to operating its business with the highest standards of ethical and professional conduct and in compliance with all applicable legal requirements.

As part of this commitment, and as set out in Angle Auto Finance’s Code of Conduct, Angle Auto Finance’s staff (as defined in Part 1.3 below) must:

- not offer, provide or receive a bribe, facilitation payment, secret commission or other improper payment and
- only offer, provide or receive gifts and entertainment in accordance with this policy.

### 1.3 Scope

This Policy applies to all staff of Angle Auto Finance including officers, managers, directors, employees, dealers, agents, contractors or authorised representatives that act for or on behalf of Angle Auto Finance. All staff must take responsibility. Violations of the Policy are subject to disciplinary measures.

## 2.0 Anti-Bribery & Corruption

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### 2.1 Prohibition on Bribery of Public Officials

Angle Auto Finance prohibits offering or providing any benefit to any person, or causing any

benefit to be offered or provided to any person, with the intention of improperly influencing a public official, in order to obtain or retain business or a business advantage.

Any request for a bribe should be reported to the Head of Compliance and Enterprise Risk.

## 2.2 Prohibition on Private Sector Bribery

Angle Auto Finance prohibits offering or providing 'secret commissions' to any person or entity or requesting or receiving 'secret commissions' from any person or entity.

AS 8801-2008 (Australian Standard, Fraud and Corruption Control) provides this definition of secret commission:

*“A payment in money or in kind which will or is intended to cause a person to act in a way that is:*

- *contrary to the interests of his or her principal or employer,*
- *contrary to the principal’s or employer’s policy on a given issue, or*
- *against the public interest.”*

*Secret commissions, by definition, will typically be paid without the knowledge or express or implicit agreement of the principal or employer and include payments intended to influence the outcome of a specific action or event as well as the actions generally over a period of time.”*

Any request for a secret commission should be escalated to the Head of Compliance and Enterprise Risk.

## 2.3 Prohibition on Facilitation Payments

Facilitation payments are customary, unofficial minor payments to public officials to secure or speed up routine actions or services (e.g. the provision of visas or customs clearance procedure) where there is no legal basis for them.

While facilitation payments are treated differently to bribes under Australian law, they are banned by most countries, and in practice it is very difficult to differentiate facilitation payments from bribes. For that reason, Angle Auto Finance prohibits offering or providing facilitation payments to public officials.

Where any doubt exists as to whether a requested payment is an official government fee or charge or an unofficial facilitation payment, the payment should only be made if the requestor can provide a formal receipt or written confirmation of the requested payment's legality.

Any request for a facilitation payment should be reported to the Head of Compliance and Enterprise Risk.

It is recognised that in some circumstances a relevant person’s welfare and safety may be put at risk by the refusal to make a facilitation payment. Relevant persons should never place themselves in danger and, in such circumstances should make the payment and report it to Legal and the Compliance & Enterprise Risk. Angle Auto Finance will not take disciplinary action against a relevant person who makes a payment in the belief that they will be at risk for

not doing so.

## 2.4 Political Contributions and Donations

Political contributions or donations in cash or kind on behalf of Angle Auto Finance are not permitted without specific approval of the Board. In considering whether or not a donation should be approved, the Board will need to be assured that there is no potential conflict of interest affecting a material transaction in connection with the contribution.

## 2.5 Charitable Contributions and Sponsorships

All charitable contributions and sponsorships provided by Angle Auto Finance must be approved by Angle Auto Finance's CEO and Head of Compliance and Enterprise Risk. Charitable contributions and sponsorships must be compatible with the businesses activities and reflect Angle Auto Finance's ongoing commitments.

# 3.0 Gifts & Entertainment

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## 3.1 Policy Principles

Gifts and entertainment are sometimes provided and received in the ordinary course of business. However, improper gifts and entertainment may amount to bribery. Consequently, Angle Auto Finance staff must only offer, provide or receive gifts and entertainment in accordance with the following principles.

1. Angle Auto Finance staff must only offer, provide or receive gifts or entertainment when aimed at general relationship building.
2. Angle Auto Finance staff must never offer, provide or receive gifts or entertainment in circumstances where gifts or entertainment are, or could be viewed as an attempt exert improper influence in order to obtain or retain business or a business advantage, particularly in light of the timing and nature of the gift or entertainment.
3. Angle Auto Finance staff must exercise extra sensitivity when dealing with government officials (e.g. regulators or local government officials). It is critical that staff never offer or provide gifts or entertainment where doing so could be viewed as an attempt to influence a public official.
4. Gifts and entertainment may never be comprised of cash or cash equivalents.
5. Gifts and entertainment must always be reasonable and proportionate.
6. All gifts provided to Angle Auto Finance's business partners must be delivered to a business address. Under no circumstances should gifts be sent to employees' home addresses.
7. All gifts provided to Angle Auto Finance's business partners must be given in Angle Auto Finance's name. Under no circumstances should gifts be given in the name of a Angle Auto Finance staff member.

8. Angle Auto Finance staff must never take gifts and entertainment received from business partners into account when making business decisions which may affect the provider. All decisions must be made objectively.
9. If a customer, business partner or supplier offers inappropriate gifts or entertainment, (i.e. those not aligned to the principles in this Policy), the Head of Compliance and Enterprise Risk must be notified immediately.

## **3.2 Disclosing Gifts & Entertainment**

### **3.2.1 Gifts & Entertainment Register and Approvals**

All staff members must record in the Gifts & Entertainment Register any time they offer, provide, are offered or receive a gift, entertainment or hospitality in connection with their role with Angle Auto Finance.

Gifts must be recorded as soon as practicable.

Gifts that are offered but declined must also be recorded.

Dependent on the value of the gift or entertainment, appropriate approval must be sought

Special approval from both the Company's CEO and the Head of Compliance and Enterprise Risk is required prior to the offering or providing any gifts or entertainment to a foreign public official (either directly or indirectly). In addition, the official should be requested to positively confirm that they are permitted to accept any gift or hospitality offered.

### **3.3 Forms of Gifts and Entertainment that May be Acceptable**

Forms of gifts and entertainment that may acceptable if offered, provided or received in accordance with the principles set out in this policy include:

- Lunches and dinners
- Tangible goods such as food, liquor, sporting goods, mobile phones etc.
- Hospitality related benefits such as tickets, accommodation flights etc.
- Marketing assistance or external sponsorship of awards and conferences

### **3.4 Forms of Gifts and Entertainment that are Never Acceptable**

Forms of gifts and entertainment that are never acceptable include:

- Cash and direct financial benefits
- Special payment of fees
- Subsidised loans
- Shares in Angle Auto Finance

The lists at sections 3.3 and 3.4 are not exhaustive. If any employee is unsure whether a gift or entertainment is acceptable to give or receive they should seek guidance and approval from their manager in the first instance. If their manager is unsure, then they must consult the Head of Compliance and Enterprise Risk if not resolved.

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## 4.0 Reporting and Investigation

Angle Auto Finance recognises the value and importance of its directors, officers or employees reporting identified or suspected instances of bribery, corruption or related conduct and strongly supports such disclosures and reports.

All persons should remain alert to any instances of staff or business partners attempting to engage, or engaging in bribery, corruption or other improper conduct or otherwise not meeting the standards of behaviour required under this policy. Reports concerning possible instances of improper practices should be made in accordance with Angle Auto Finance's Whistleblower Protection Policy.

Angle Auto Finance will take all available steps to provide protection to persons who make such reports from any victimisation or detrimental action in reprisal for the making of a report, and subsequent investigations will be conducted in accordance with the principles set out in Angle Auto Finance's Whistleblower Protection Policy.