Group Anti-Bribery and Corruption Policy

Purpose and scope

Purpose

This Policy sets out the Group's Anti-Bribery and Corruption (**AB&C**) zero risk appetite and the principles that form the foundation of the Group's AB&C management framework. This framework enables the Group to prevent, detect and respond to Bribery and Corruption risks and to comply with AB&C laws in the jurisdictions in which the Group operates.

This is a key policy under the Code of Conduct which helps protect our communities and the integrity of financial systems.

Scope

This Policy applies to the Group, its Directors, Employees, Contractors and Secondees and Third Parties acting for or on behalf of the Group, collectively defined as Associated Persons.

Associated Persons must be aware of and are responsible for understanding how this Policy applies to their role as an Associated Person and are accountable for ensuring compliance with all applicable Bribery and Corruption obligations arising in respect of that role.

The Policy applies to any activity or behaviour undertaken during the course of, or in connection with, an appointment, employment or act for or on behalf of the Group, regardless of the geographical location in which that activity or behaviour occurs.

For those parts of the Group that are subject to laws, regulatory requirements or contractual obligations specific to their jurisdiction that conflict with this Policy, the Group AB&C Standard, or the Group Gifts & Entertainment Procedure, the BU/SU or Group entity must comply with the more stringent standard and ensure that local laws are not contravened.

ASB Bank Limited and CBA Europe N.V. maintain local AB&C Policies in accordance with their respective local regulatory requirements.

Policy statement

Associated Persons must be aware of and understand the Group's AB&C obligations and requirements applying to them, to manage Bribery and Corruption risks faced by the Group. Bribery and Corruption are serious offences and can result in criminal and civil penalties for any person or entity involved in such offences.

The Group has zero tolerance for Bribery and Corruption and considers such activity to be unethical and contrary to good corporate governance. In pursuing our purpose, the Group aims to protect its customers and communities by acting to prevent all forms of Bribery and Corruption.

The Group prohibits all forms of Bribery, Corruption, and improper influence in connection with its business activities. This includes any conduct, whether involving financial or non-financial benefits, intended to improperly influence a decision, outcome, or individual, including conduct arising from Foreign Interference. Employees and Third Parties must not offer, give, solicit, or accept any benefit, advantage, or inducement, nor engage in undisclosed relationships or activities, that could

compromise independence, create a conflict of interest, or undermine the integrity of the Group's operations.

Policy requirements

The AB&C Principles set out below should be read in conjunction with the Group AB&C Standard.

1. Zero tolerance for Bribery, Corruption and Facilitation Payments

The Group has zero tolerance for Bribery, Corruption and Facilitation Payments.

Associated Persons are prohibited from:

- engaging in any kind of Bribery or Corruption, regardless of whether or not a benefit is given to or received by another person, including Public Officials, and regardless of the value of the benefit;
- falsifying any book, record or account of the Group or any related documentation to conceal Bribery and/or Corruption; and
- making political donations in the form of cash/money on behalf of the Group. Other political related expenditure, such as sponsorships, memberships, payments to attend political events and gifts or entertainment to be given to Political Stakeholders or Senior Government Officials, must undergo appropriate approvals and conform with relevant policies, standards and procedures.

Facilitation Payments

Offering or making a Facilitation Payment of any kind is prohibited, regardless of the provisions of applicable law or accepted local customs and norms.

The only exception to this prohibition is where a Facilitation Payment is required to protect against perceived or actual immediate danger to personal safety.

If this occurs, it must be immediately reported to Protective Security, Economic Crime Risk (**ECR**) AB&C or the relevant local BU/SU risk and compliance team, and subsequent directives followed.

2. Identifying, mitigating and managing Bribery and Corruption risks

The Group must identify, manage and mitigate Bribery and Corruption risks by:

- undertaking AB&C risk assessments on a Risk Based Approach to identify the Bribery and Corruption risks each BU/SU may reasonably face, giving consideration to the nature of its organisation, its Employees, Third Parties, customer types, occupations and industries of our customers and Third Parties, transactions and business practices, and the jurisdiction of the BU/SU and its business activities;
- responding to events, relationships or enterprises that could increase or alter a BU/SU's risk exposure; implementing appropriate systems, controls, processes and procedures to mitigate and manage each BU/SU's Bribery and Corruption risks, as identified through the risk assessment;
- making and retaining a record of all B&C risks and associated controls in RiskInSite in accordance with the Compliance

Management Framework (CMF) and Group Operational Risk Management Framework Policy; and

- conducting regular monitoring and testing of AB&C processes and controls to evaluate their effectiveness and identify and respond to opportunities for continuous improvement.

3. 'Speaking up' and reporting of AB&C matters

The Group fosters a culture of speaking up to encourage reporting of any suspicion or allegation of a Bribery and/or Corruption incident, including those related to suspected Foreign Interference, or other concerns relating to AB&C without fear of reprisal.

Any suspicions or allegations of Bribery and/or Corruption, including those linked to Foreign Interference, must be raised in accordance with the Group's reporting channels.

The channels for reporting Bribery and Corruption concerns are outlined in the following table.

Principal channels for reporting Bribery and Corruption concerns	
Line management	Directly to your line manager, Manager once Removed (MOR) or Senior Management within your BU/SU
Group Investigations	groupinvestigations@cba.com.au +61 2 8388 4720
Economic Crime Risk	Group AB&C Officer (EGM and Co-Head ECR)
SpeakUP Hotline	1800 773 258 (free call inside Australia)
	+61 2 9595 3294 speakup@speakuphotline.com.au
SpeakUP Online	Via the Group's intranet or at https://cba.whispli.com/speakuponline

Additional contact details for reporting Bribery and Corruption concerns may be available across jurisdictions in which the Group operates.

The Group must assess and investigate all suspicions and allegations of Bribery, Corruption and other related AB&C matters independently of BU/SUs and determine whether the suspicion or allegation is substantiated. Substantiated matters must be escalated to ECR AB&C by the relevant investigations team for a determination as to whether the conduct amounts to AB&C Reportable Conduct. If the conduct is AB&C Reportable Conduct, it must be escalated or reported in accordance with the determination.

The Group Whistleblower Policy sets out how Eligible Persons:

- can report a Bribery and/or Corruption incident or other concern relating to AB&C to the SpeakUP Program;
- can remain anonymous when reporting concerns to the SpeakUP Program, during and after the investigation; and

- will be supported so that they can feel safe in expressing their concerns and not be subject to reprisals in response to expressing their concerns.

The support and protections outlined in the Group Whistleblower Policy are available to Eligible Persons irrespective of whether the suspicion or allegation reported in their whistleblower disclosure is substantiated.

4. Transparency and record keeping

The Group must maintain transparency and mitigate Bribery and Corruption risks through its policies, standards and procedures relating to:

- gifts and entertainment;
- political donations and lobbying;
- conflicts of interest;
- corporate expenses;
- Employee due diligence and recruitment;
- donations and sponsorships; and
- engagement with third parties.

The Group must maintain appropriate records of financial and non-financial controls and ensure that they are accurate and protected against improper use or loss of integrity.

Executive Directors and Employees of the Group must comply with the recording, reporting and approval requirements set out in the Group AB&C Standard and related internal documents, Group Gifts and Entertainment Procedure, Group Conflicts Management Policy and the Group Conflicts Management Procedure and Group Expense Management Policy and Procedures.

5. Due Diligence

Employee Due Diligence

The Group must identify and manage Bribery and Corruption risks in relation to all prospective and existing Employees and Directors by undertaking appropriate due diligence screening with the objective of ensuring their identity, honesty and integrity.

The Group must not offer or provide employment opportunities, whether paid or unpaid, permanent or temporary, as an inducement to anyone to act improperly to obtain or retain a business Advantage.

The Group must undertake due diligence screening on all Employees and Directors:

- prior to commencement of their role with the Group; and
- in circumstances which are subject to ongoing Employee due diligence requirements.

Screening is undertaken in accordance with the Group Financial Crime Personnel Due Diligence Standard.

Third Party due diligence

The Group must know who it is doing business with and who is conducting business for or on its behalf.

In relation to Third Parties and in accordance with the AB&C Third Parties Resource, BU/SUs must:

- assess Third Party AB&C risk, undertake appropriate due diligence on and maintain records relating to prospective and existing Third Parties;
- undertake ongoing due diligence on existing Third Parties to ensure that any relevant new information or changes to existing information which may impact AB&C risk can be considered; and

ensure that contracts with Third Parties contain appropriate AB&C clauses.

6. Training and awareness

The Group must ensure that Associated Persons are aware of the Group's zero tolerance for Bribery and Corruption and promote a culture of compliance with AB&C obligations.

The Group periodically communicates to Associated Persons its commitment to its AB&C risk appetite and prevention of Bribery and Corruption.

The Group must maintain an ongoing AB&C risk awareness training program as set out in the Financial Crime Risk Awareness Program, which includes guidance on when and how Employees and Directors should seek advice and report any concerns or suspicions or allegations of Bribery and Corruption.

Employees must undertake all assigned AB&C training and successfully complete the post-training assessment and/or attestation by the specified due date. This includes:

- mandatory AB&C Risk Awareness training in the Financial Crime module; and
- for Employees within designated High-Risk Roles, AB&C for High-Risk Roles training.

BU/SUs should consider whether further targeted training is appropriate for Associated Persons in light of:

- the activities and location(s) of the BU/SU's operations;
- any identified Bribery and/or Corruption incidents, or other concerns arising in relation to AB&C;
- the apparent existence of AB&C red flags as set out in the Group AB&C Standard; and/or
- the assessment that a Third Party represents a heightened level of AB&C risk;
- other risk assessment outcomes.

BUs/SUs should develop and conduct targeted training, as necessary, in consultation with ECR.

BU/SUs must maintain records of AB&C training completion and monitor training completion rates.

7. Compliance with AB&C regimes

The Group must comply with all applicable AB&C laws and regulations relevant to the BU/SU's jurisdiction. Specifically, this Policy supports compliance with:

- *Australian Criminal Code Act 1995* (Cth);
- *UK Bribery Act 2010*;
- US Foreign Corrupt Practices Act 1977;

- any other AB&C or related laws that require compliance even where business activity may be carried out in another country, (i.e., any legislation with extraterritorial effect); and

reporting and accounting obligations imposed by regulators and/or enforcement agencies.

Accountabilities

Role	Accountabilities
CBA Board	• Approving this Policy in line with its review cycle and approving any material changes to the Policy
Group Chief Risk Officer	• Reporting material breaches and material issues regarding AB&C matters to the Chief Executive Officer, ELT NFRC and Board Risk and Compliance Committee.
Group AB&C Officer (EGM and Co-Head ECR)	• Overseeing the design and implementation of the Group's AB&C management framework. • Promoting a culture of compliance with the AB&C obligations through periodically communicating the Group's commitment to the prevention of Bribery and Corruption. • Providing advice and guidance on AB&C controls, frameworks and issues relating to AB&C. • Ensuring that the Group's AB&C management systems comply with the principles set out in this Policy and the Group AB&C Standard. • Reporting and escalating AB&C matters to the appropriate stakeholders (including the Chief Risk Officer) and relevant governance forums, including the ELTNFRC and Board Risk and Compliance Committee. • Ensuring this Policy and the Group AB&C Standard are periodically reviewed, and updated, in consultation with BU/SUs.
BU/SU FAR Accountable Executive *[Line 1]*	• Ongoing oversight of their BU/SU's Bribery and Corruption risk and ensuring their BU/SU's implementation and compliance with the principles set out in this Policy and the Group AB&C Standard.
BU/SU Employees	• Developing and implementing appropriate processes, procedures, systems and controls to comply with this Policy and the Group AB&C Standard.

- Ensuring adequate oversight of Bribery and Corruption risk through the respective BU/SU NFRC and other governance forums, as appropriate

Risk & Control function

- Establishing processes and procedures to monitor compliance with the AB&C framework on a continual basis to ensure ongoing compliance, in accordance with the Group's Three Lines of Accountability framework.

All Employees

- Complying with the principle of a zero appetite for Bribery, Corruption and Facilitation Payments.
- Being aware of and responding to AB&C risks and incidents.
- Reporting Bribery and Corruption suspicions or allegations internally to line management, FCC, Group Investigations, the SpeakUP Program and/or in accordance with AB&C escalation and reporting processes.
- Meeting the requirements of other AB&C related Group policies, standards and procedures, any BU/SU AB&C procedures and record keeping requirements.
- Completing mandatory AB&C Risk Awareness Training, post-training assessment and/or attestation and, if required, AB&C training for High Risk Roles within the assigned timeframes.

Line Management and MORs (Additional)

- Escalating Bribery and/or Corruption suspicions and allegations raised by Employees to the SpeakUP Program if you are an Eligible Recipient in accordance with the Group Whistleblower Policy, otherwise to Group Investigations, at the earliest opportunity.

Senior Management (Additional)

- Supporting staff in meeting the requirements of this Policy.
- Escalating any AB&C-related concerns to ECR, SpeakUP and/or Group Investigations, as appropriate.
- Escalating all Bribery and/or Corruption suspicions or allegations raised by Employees to the SpeakUP Program if you are an Eligible Recipient in accordance with the Group Whistleblower Policy, otherwise to

	Group Investigations, at the earliest opportunity. • Promoting a culture of compliance with the AB&C obligations.
Economic Crime Risk *[Line 2]*	***ECR AB&C*** • Providing support and guidance to BU/SUs in relation to the AB&C framework. • Assessing and determining outcomes of BU/SU AB&C escalations. • Maintaining and reviewing this Policy, the Group AB&C Standard and supporting resources biennially, at a minimum. • Contribute to determining, in conjunction with other relevant stakeholders, whether substantiated conduct escalated by SpeakUP and Group Investigations is AB&C Reportable Conduct, such that it requires further escalation or reporting, and if so, the additional escalations and reporting required. ***ECR Assurance*** • Providing assurance over BU/SU compliance with the principles set out in this Policy and the Group AB&C Standard in accordance with the annual risk-based ECR Assurance Plan. ***ECR Risk Assessments*** • Performing financial crime related risk assessments pursuant to the Group Financial Crime Risk Assessment Standard. • Performing management and oversight of AB&C related RiskInSite issues and incidents including liaison with ECR AB&C as/when required. • Accepting and/or approving BU/SU remediation
Group Investigations	• Ensuring non-whistleblowing suspicions or allegations of Bribery and Corruption reported are investigated. • Escalating suspicions or allegations of Bribery and Corruption substantiated by Group Investigations to ECR AB&C for a determination on whether the conduct is AB&C Reportable Conduct, and if so, the further escalations or reporting required in accordance with the Group AB&C Standard.
Group Audit & Assurance *[Line 3]*	• Conducting an independent review of the AB&C management framework in accordance with the Group Audit &

	Assurance plan and the Group's Three Lines of Accountability framework.
SpeakUP	• Ensuring whistleblower suspicions or allegations of Bribery and Corruption reported to SpeakUP are investigated. • Escalating serious Bribery and Corruption suspicions or allegations substantiated by SpeakUP to ECR AB&C for a determination on whether the conduct is AB&C Reportable Conduct, and if so, the further escalations or reporting required in accordance with the Group AB&C Standard.

Compliance statement

Compliance with this Policy supports compliance with AB&C laws in the jurisdictions in which the Group operates. This Policy forms part of the Group AB&C compliance framework which is a framework of systems, processes and controls to prevent, detect and respond to Bribery and Corruption risks.

Breach of policy

Consequences

All Associated Persons have accountability to protect the Group, and its reputation from the risks arising from Bribery and Corruption.

All reasonable steps must be undertaken to comply with this Policy. A breach of this Policy may be regarded as misconduct, which may result in disciplinary action (including termination of employment or engagement).

This Policy must be read together with the Group AB&C Standard, which sets out the minimum requirements necessary for complying with this Policy. Failure to follow the Group AB&C Standard may amount to a breach of this Policy. BU/SUs and Associated Persons must also recognise that:

- A breach of AB&C laws may result in legal or regulatory action including criminal proceedings and the revocation of licences, significant reputational damage and/or financial loss - to Employees, Group entities and to the Group as a whole.
- A Group entity may be liable for the failure to prevent the Bribery of a foreign Public Official or another person by an Associated Person if the Associated Person Bribes for the profit or gain of the Group entity even where the Associated Person has not been convicted of the foreign Bribery offence. The entity may have a defence where it can demonstrate that it had adequate procedures in place designed to prevent the commission of an act of foreign Bribery by its Associated Persons.
- The offence of Bribery of a foreign Public Official can apply even when the conduct occurred outside the jurisdiction to which the offence relates.

- Employees who are Directors of the Group's majority and/or minority owned subsidiaries and investments may also be exposed to personal liability for breaches of AB&C laws.
- The Group will cooperate with authorities if any legal, regulatory or criminal investigations or proceedings are brought in relation to alleged violation of AB&C laws. This includes in relation to any investigation of, or proceedings relating to, Associated Persons.

Escalation

Potential or confirmed breaches of the obligations outlined in this Policy must be escalated according to the Group Issue Management Standard or Group Incident Standard and Procedures, and in accordance with the Group AB&C Standard.

Material breaches of this Policy must be reported to the CBA Board and Board Risk and Compliance Committee.

Definitions

In this Policy, defined terms are capitalised. Those terms have the meaning given to them below or, if not defined below, in the Group Glossary.

AB&C

Anti-Bribery and Corruption.

AB&C Reportable Conduct

Investigated and substantiated suspicions or allegations of:

- Bribery,
- Corruption,
- Facilitation payments,
- failing to meet record keeping obligations, and

failing to prevent an act of Bribery occurring that require escalation to the CBA Board, Board Risk and Compliance Committee, Group AB&C Officer, relevant offshore MLRO (where applicable), relevant EGM/GE and CROs, relevant legal team(s), HR, regulators and enforcement agencies, as appropriate.

Advantage

A financial or non-financial benefit, circumstance or opportunity that puts one party in a more favourable or superior position.

Anything Of Value

Any Advantage, financial or otherwise. It extends beyond cash and cash equivalents to include gifts, entertainment, services, amenities, charitable contributions, and employment etc. There is no minimum amount or threshold value that must be exceeded before a 'thing of value' may be illegal or impermissible. The purpose for which the thing of value was offered or received need not be achieved in order for there to be a Bribery risk.

Associated Persons

The Group, its Directors, Employees, Contractors and Secondees and Third Parties acting for or on behalf of the Group, collectively defined as Associated Persons.

Bribe or Bribery

The offer, promise, giving, requesting, authorising or receiving of Anything of Value directly or indirectly to / from another person(s) with the intention of influencing or rewarding improper performance.

'Another person' can include, but is not limited to: a Public Official, Third Party, supplier, customer, etc.

Bribery can include either 'active bribery', in which a person offers or gives something of value to influence performance or obtain an unfair Advantage, or

	'passive bribery', in which a person receives, attempts to receive, or requests something of value in exchange for improper performance. Authorising such activity is also considered Bribery, as is providing a payment to a Third Party while suspecting, knowing, or having reason to know that some or all of it will be passed along to another person for improper purposes.
Corruption	An act or omission for an improper or unlawful purpose, which involves the abuse of a position of trust or power.
Eligible Persons	Refer to the definition in the Group Whistleblower Policy.
Eligible Recipient	Refer to the meaning referenced in the Group Whistleblower Policy.
Employee	For the purposes of this Policy and the Group AB&C Standard, an Employee includes: • Permanent employees: employed directly through the Group as a regular, maximum term, casual, non-executive director, international assignee or intern. • Contractors: employed through a preferred recruitment agency.
Economic Crime Risk	For the purposes of this Policy and the Group AB&C Standard, ECR operates as a Line 2 function in Risk Management and includes policy and regulatory engagement, advisory and assurance responsibilities.
Facilitation Payment	A payment of minor value paid to a Public Official via unofficial channels to expedite or secure the performance of a routine government action of a minor nature (e.g., the approval of permits and licences). A Facilitation Payment may be regarded as a form of Bribery.
Foreign Interference	Covert, deceptive or coercive activities by external parties, including state-linked actors, seeking to influence Employees, Third Parties, or decision-making processes.
Group Investigations	The team that is accountable for the investigation of non-whistleblower internal fraud, serious misconduct and major external fraud events involving serious or organised crime.
High Risk Roles	Roles that meet the high risk role characteristics defined in the Financial Crime Risk Awareness Program.
MOR	Manager Once Removed
Non-customer	A Non-customer (also known as a counterparty or a non-trading relationship) is an individual or entity who is not considered a customer of the Group under Part B (AML/CTF Program) or the Global Customer Due Diligence Resource as they do not receive a designated service or have products/services being provided by the Group, however their relationship to the Group presents financial crime risk exposure. A Non-customer is an individual or entity that is associated to a Group customer transaction but is not the transacting customer or related party of the customer.
Protective Security	The team in Technology that is accountable for security incident response and the 24/7 Security Operations Centre that answers phone-calls to the Group Emergency Hotline.

Political Stakeholder	As defined by the Group External Communication and Engagement Policy.
Public Official (foreign or domestic)	A Public Official is an elected or appointed official, employee or representative of a government (which includes the executive, legislative, administrative, military, or judicial branches of a government; a political party; or a government-owned, government-controlled, or government-funded corporation, institution or charity) at any level, and may include: • Government regulators and persons acting in an official capacity on behalf of government regulators; • Employees of self-regulatory organisations in the financial services industry (even if the self-regulatory organisation is not government-sponsored); • Members of a royal family; • Officials or public office candidates of any political party; • Officers, directors or employees of organisations with government ownership or control (as defined below), including: – Sovereign wealth funds; – Public pension funds; – State owned or controlled organisations, such as hospitals, financial institutions, utility companies and other corporations; • Officers, directors or employees of educational institutions that are established or operated by a federal, state, or local government entity; and • Officials of public international organisations and persons acting in an official capacity for or on behalf of governments or public international organisations, including but not limited to: – The World Health Organisation; – United Nations development agencies; – International Red Cross; – International Monetary Fund; and – The World Bank Group. "Government ownership or control" means a single government or its instrumentality, which: • Owns at least 50% of an entity; or • Exercises actual management or control of an entity, irrespective of its ownership percentage. The definition of a Public Official varies across jurisdictions. BU/SUs should refer to their BU/SU legal team, Group Legal counsel, ECR or their local risk and compliance team for detailed guidance on definitions.
Risk Based Approach	Identifying the highest compliance risks first, making them a priority for compliance controls, policies and procedures and once the compliance program reduces those highest risks to acceptable levels, it moves on to lower risks.
Senior Government Official	As defined by the Group External Communication and Engagement Policy
Senior Management	General Manager (or equivalent) and above.

SpeakUP	The team that is accountable for managing the SpeakUP Program and investigating whistleblower disclosures made under the Group Whistleblower Policy.
SpeakUP Program	Refer to the meaning referenced in the Group Whistleblower Policy.
Third Party	Any external party (not a Group entity) with whom the Group has, or plans to establish, some form of business relationship. This Third-Party definition excludes: • Ad-hoc low value business expenses where no formal relationship is being established; • Customers of the Group (that are not additionally engaged as a Third Party) as defined by the Joint AML/CTF Program Part B and Global Customer Due Diligence Resource for IB&M; and • Non-customers associated to a CBA customer transaction. Further information about types of Third Parties can be found in the AB&C Third Party Resource.

Policy governance

Approver	CBA Board
Exemption Authority	Group Chief Risk Officer
Owner	EGM and Co-Head Economic Crime Risk (Group AB&C Officer)
Support	Economic Crime Risk or BU/SU Risk and Compliance
Review Cycle	Biennial
Next Review Date	31 December 2027

Relevant documents

Related internal documents	GPF Glossary Group Issue Management Procedure Group Incident Management Procedure Group Anti-Bribery and Corruption Standard Compliance Management Framework (CMF) Operational Risk Management Framework Policy Code of Conduct Group Financial Crime Personnel Due Diligence Standard Group Whistleblower Policy Group Gifts and Entertainment Procedure Group AB&C Third Party Resource

	Group Conflicts Management Policy Group Conflicts Management Procedure Group Product Development and Distribution Policy Group Supplier Lifecycle Policy Group Supplier Lifecycle Procedure Group Expense Management Policy Group Financial Crime Risk Assessment Standard Group External Communications and Engagement Policy ASB Anti-Bribery and Corruption Policy CBA Europe N.V. Anti-Bribery and Corruption Policy
External sources of obligations	*Australian Criminal Code Act 1995 (Cth)* *UK Bribery Act 2010* *US Foreign Corrupt Practices Act 1977* Other AB&C laws relevant to a BU/SU's jurisdiction.

Material revisions

Version	Approval Date	Effective Date	Details
05	29 April 2018	01 May 2018	Material revisions to format, policy principles and definitions.
06	11 December 2018	11 December 2018	Revision to template and minor adjustments to text.
6.1	28 June 2019	28 June 2019	Revision to template; immaterial revisions to Principles 1 and 6, and definitions
6.2	24 June 2020	24 June 2020	Immaterial revision to Principle 2 in relation to risk assessment frequency.
6.3	09 December 2020	31 December 2020	Annual review; immaterial revisions approved by CBA Board.
6.4	28 April 2021	03 May 2021	Immaterial revision to remove reference to AHL under Purpose and Scope due to divestment; addition of subsidiary policies under Relevant Documents.
6.5	25 May 2023	25 May 2023	Immaterial edits as part of FCC Policy Suite harmonisation and to adopt the latest GPF template.
07	14 December 2023	30 December 2023	Periodic Review. • Inclusion of specific references from the Wolfsberg Group's updated AB&C Guidance; • Edits to ensure the Policy remains fit for purpose for the Combatting Foreign Bribery Bill • Inclusion of an 'Associated Person' definition as per the Combatting Foreign Bribery Bill; and • Updates to align the relevant definitions and accountabilities.
7.1	27 June 2024	27 June 2024	Immaterial revision to remove outdated references.

Version	Approval Date	Effective Date	Details
7.2	19 December 2024	19 December 2024	Immaterial revision to remove outdated references to the SpeakUp Program and align language to the Whistleblowing Policy and Procedure.
8.0	09 December 2025	31 December 2025	Periodic Review; Simplification and streamlining of content. Adding reference and links to relevant AB&C related policy documents. Removed references to revoked documents.
8.1	09 September 2026	30 September 2026	Trigger Review, immaterial changes: • Incorporated references to Foreign Interference as a mechanism for bribery and corruption. • Updating reference to Group Conflicts Management documents • Updated reference to Group Financial Crime Personnel Due Standard • Replace references to 'FCC' to 'ECR' across the document.