



1. INTRODUCTION

- 1.1 At Aveo our focus is on Kindness, Care and Respect. In accordance with these values, Aveo is committed to eliminating the incidence of Fraud, Bribery and Corruption (**FB&C**) in Aveo Group Limited and Aveo Funds Management (together **Aveo**).
- 1.2 This Anti-Fraud, Bribery and Corruption Policy (**Policy**) applies to all Aveo activities across all jurisdictions in which Aveo operates. It extends to:
 - (a) Aveo, its subsidiaries and all entities under the control of Aveo (**Aveo Entities**); and
 - (b) all directors, officers and employees (which includes temporary or contract staff) of Aveo Entities (**Aveo Personnel**).
- 1.3 Individual and corporate entities associated with Aveo, which act for or on behalf of Aveo, or who perform functions in relation to or on behalf of Aveo are expected to have and comply with policies managing FB&C risk. This includes, but is not limited to, contractors, consultants, third party agents, care providers, third party property managers, persons acting in a fiduciary capacity, service providers and joint venture partners in any of Aveo's operations globally (collectively, **Business Partners**).
- 1.4 Aveo may request copies of a Business Partner's **Anti-Fraud, Bribery and Corruption Policy** and related materials. Where Aveo identifies that a Business Partner does not have policies managing FB&C risks, or identifies that these policies are inadequate, Aveo expects its Business Partners to comply with this Policy and the Anti-Fraud, Bribery and Corruption Programme.
- 1.5 Aveo seeks to encourage and influence all of its non-controlled interests (such as non-controlled joint ventures) to have and implement anti-FB&C policies and procedures to an equivalent standard as this Policy.

2. ANTI-FRAUD, BRIBERY AND CORRUPTION PROGRAMME

- 2.1 The Aveo *Anti-Fraud, Bribery and Corruption Programme* (**Programme**) is an organisation-wide governance structure that works in conjunction with Aveo's Code of Conduct and Aveo's Enterprise Risk Management Framework to proactively minimise and manage the risk of Fraud, Bribery and Corruption.
 - 2.2 The Programme consists of:
 - (a) this *Policy*;
 - (b) Aveo's *Code of Conduct*;
 - (c) Aveo's Fraud, Bribery and Corruption Control Strategy which supports this Policy by detailing processes to be followed to manage FB&C risks;
 - (d) Aveo's *Whistleblower Policy*, which sets out Aveo's processes for reporting misconduct, including breaches of this Policy; and
 - (e) Aveo's *Whistleblowing – A User Guide*.
 - 2.3 The Programme is supported by other corporate policies such as Aveo's Procurement and Business Dealings Policy, Financial Delegations of Authority, Gifts, Benefits & Entertainment Policy and the Political and Charitable Donations Policy etc.
 - 2.4 The Programme establishes that Aveo has a zero tolerance approach to any form of fraud, bribery or corruption, and that Aveo will treat potential instances of fraudulent, bribable or corrupt conduct as a threat to Aveo's reputation and integrity as a business.
- ## 3. WHAT IS FRAUD, BRIBERY AND CORRUPTION?
- 3.1 **Fraud** is any dishonest activity causing actual or potential financial loss to any person or entity that involves the use of deception at the time, immediately before or immediately following the activity. It includes theft of monies or other property, as well as the deliberate falsification, concealment,



destruction or use of falsified documentation that was or is intended for use, as well as the improper use of information or position for personal financial benefit.

- 3.2 **Corruption** (or **Corrupt Conduct**) is the abuse of position and/or trust to obtain an improper advantage or gain.
- 3.3 **Bribery** has a very wide definition. Bribery involves (either directly or indirectly) improperly offering or providing a benefit or something of value to a public official, someone in business or a close relative of such a person in order to obtain or retain business or an advantage or to induce or reward improper conduct or an improper decision. Bribery may not always be in the form of cash payments and may take other forms, including:
- (a) cash equivalents (e.g. gift vouchers, non-arm's length loans, forgiveness of debt or other transactions loans);
 - (b) gifts, hospitality, entertainment or travel;
 - (c) contributions (charitable / political) or scholarships;
 - (d) offers of employment, directorships, internships or secondments;
 - (e) the provision of favours (e.g. discounted or 'free' use of Aveo's services, facilities or property);
 - (f) training;
 - (g) procurement or service contracts;
 - (h) phony jobs or "consulting" relationships;
 - (i) excessive discounts or rebates; or
 - (j) anything else that is of value to the recipient.

Facilitation payments are also a form of bribe and are, therefore, not permitted. Facilitation payments are small payments made to secure or speed up routine actions or otherwise induce public officials or other third parties to perform routine functions they are otherwise obligated to perform, such as issuing permits, approving immigration

documents or releasing goods held in customs. This does not include official, legally required statutory or administrative fees formally imposed and codified by government agencies for expedited service.

Refer to the company's *Anti-Fraud, Bribery and Corruption Programme* for further details.

4. OBLIGATIONS AND PROHIBITED CONDUCT

- 4.1 Fraud, Corrupt Conduct, and the offering, promising, paying, requesting or accepting of Bribes are prohibited for all Aveo Entities and Aveo Personnel.
- 4.2 Aveo has a **zero tolerance approach** to bribery.
- 4.3 Aveo Entities and Aveo Personnel must comply with the standards established by this Policy and the Programme. In particular, Aveo Personnel must comply with the Programme when undertaking any of the following activities on behalf of Aveo Entities:
- (a) offering or accepting any benefits, including gifts, entertainment, meals, travel, accommodation, training or any other things of value;
 - (b) engaging and monitoring Business Partners;
 - (c) procuring goods and services;
 - (d) commencing activities in new countries or entering into new business ventures; and
 - (e) making political, charitable or community contributions or sponsorships.
- 4.4 Aveo Entities and Aveo Personnel must not:
- (a) Pay, offer, promise, request or accept, directly or indirectly, any bribe, kickback, secret commission or other form of improper payment (however small) in order to obtain or retain any improper business or other advantage for Aveo, for themselves, or for others.
 - (b) Make facilitation payments. Facilitation payments are payments (typically of low





value) made to a public official with the purpose of expediting or facilitating the performance of a routine governmental action.

- (c) Provide or accept benefits including gifts, hospitality, entertainment, meals, travel, accommodation, training or other things of value which are contrary to the Programme.
 - (d) Provide or offer any gifts or benefits in circumstances where it is known or suspected that the recipient cannot accept the gift or benefit pursuant to law or to any duties that they owe others.
 - (e) Make political, charitable or community contributions or sponsorships which are contrary to the Programme.
 - (f) Enter into or continue a business relationship with a Business Partner if they cannot be satisfied that the entity will behave in a manner consistent with this Policy.
 - (g) Engage or make a payment to a Business Partner, or any other third party, knowing or reasonably suspecting the Business Partner or third party may use or offer all or a portion of the payment directly or indirectly as a bribe, kickback, secret commission or other form of improper payment.
 - (h) Falsify or misrepresent any book, record or account relating to Aveo's business. All receipts and expenditures must be supported by documents that describe them accurately and properly.
 - (i) Cause or authorise any of the above conduct or any other conduct which is inconsistent with this Policy or the Programme.
- 4.5 Aveo Personnel must not engage in any of the conduct described in 4.4 above in their 'personal capacity' in an attempt to evade the requirements of this Policy.
- 4.6 Aveo Entities and Aveo Personnel must keep accurate and complete records of all steps

that have been taken towards compliance with these standards.

5. COMPLIANCE WITH THIS POLICY

- 5.1 No Aveo Personnel will be penalised, or be subject to other adverse consequences, for refusing to pay bribes or engage in any other conduct which would be a breach of this Policy or the Programme, even if that refusal may affect Aveo's business.
- 5.2 Aveo has zero tolerance for conduct in violation of this Policy or the Programme.
- 5.3 A breach of any of the provisions of this Policy may lead to disciplinary action and will be investigated in line with Aveo's Human Resources and/or Whistleblower Policies. It may be treated as gross misconduct and could render you liable to summary dismissal.
- 5.4 Conduct in violation of this Policy may also breach applicable anti-corruption laws and regulations and result in criminal or civil penalties, including fines and imprisonment.
- 5.5 Aveo Personnel must cooperate fully and openly with any investigation by Aveo into alleged or suspected corrupt activity or breach of this Policy. Failure to cooperate or to provide truthful information is a breach of this Policy.
- 5.6 To help ensure that our practices are reasonable, appropriate and otherwise in accordance with applicable regulatory requirements, certain gifts, meals and entertainment must be logged and/or pre-approved. Refer Aveo's Gifts, Benefits & Entertainment Policy and Political and Charitable Donation Policy for further details.

6. EXCEPTIONS AND VARIATIONS FROM POLICY REQUIREMENTS

- 6.1 Aveo Personnel will not be penalised for providing a payment or benefit in circumstances where they fear imminent physical injury to themselves or another person if the payment or benefit is not provided.



- 6.2 If any payment or benefit is provided in the circumstances described in 6.1 above, you must:
- (a) immediately report it to the Chief Risk Officer or the General Counsel and Company Secretary; and
 - (b) promptly record it (including the amount of the payment or identification of the benefit provided, the identity of the person to whom it was made and the circumstances in which it was made).
- 6.3 Any other variations from the requirements in this Policy must be approved in advance by the General Counsel and Company Secretary.

7. REPORTING SUSPECTED OR ACTUAL BREACHES

- 7.1 If any Aveo Personnel become aware of any actual or suspected breaches of this Policy, the Programme, any relevant anti-corruption laws and regulations, or any request or demand for any undue financial or other advantage, this must be reported by way of the *Whistleblower Policy*.
- 7.2 Material breaches of the Policy will be reported to the Audit & Risk Committee.
- 7.3 Aveo will not permit retaliation of any kind against any Aveo Personnel where they have reasonable grounds to suspect a violation of this Policy. Any actual or attempted retaliation is also a breach of this Policy.

8. RESPONSIBILITY FOR THIS POLICY

- 8.1 Every employee of Aveo has a responsibility when it comes to preventing and reporting suspected instances of Fraud, Bribery or Corruption.
- 8.2 To assist staff to better understand their responsibilities, key accountabilities under the Programme are summarised in **Attachment 1** to this Policy.

9. TRAINING AND GUIDANCE

- 9.1 Aveo will ensure that Aveo Personnel (including new employees) and applicable Business Partners are informed about this

Policy and the Programme.

- 9.2 All individuals in higher risk roles are provided with anti-bribery training.
- 9.3 Aveo Personnel will receive or be provided with access to a copy of this Policy and the Programme and will be provided with training on FB&C awareness.

10. GOVERNANCE

- 10.1 This Policy will be reviewed at least biennially by the Audit & Risk Committee to ensure its continued relevance and compliance with prevailing law.

All queries regarding this Policy should be directed to the Chief Risk Officer or General Counsel and Company Secretary.

This Policy was reviewed and updates approved by the Audit & Risk Committee on 6 June 2024.



Anti-Fraud, Bribery and Corruption Policy (Abridged Supplier Version)

