



HUB²⁴

HUB24 Group
Anti-Bribery & Corruption Policy

Overview	
Purpose	Set the standard for HUB24 Group on acts of bribery and corruption and outline the responsibilities of the Group and our People regarding the management of bribery and corruption risk.
Scope	HUB24 Group
Application	All HUB24 People
Document Control	
Executive Owner	Chief Risk Officer

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1. Overview

1.1 Background & Purpose

- 1.1.1 HUB24 Limited (HUB24) is an ASX listed entity and the parent entity of the HUB24 Group of companies (HUB24 Group).
- 1.1.2 The HUB24 Group is committed to complying with the laws and regulations in which its businesses operate and acting in a manner, consistent with a strong culture of corporate governance, ethical conduct and sound business practices.
- 1.1.3 The law prohibits certain behaviour that constitutes bribery or corruption, such as improper payments made or received in business dealings, which are serious criminal offences in Australia as well as most overseas countries¹. It is generally not relevant whether a bribe is accepted or actually paid. Offering a bribe will usually be sufficient for an offence to be committed.
- 1.1.4 The HUB24 Group Anti-Bribery and Corruption Policy (this Policy) sets the standard on acts of bribery and corruption and outlines the responsibilities of the Group and our People regarding the management of bribery and corruption risk.

1.2 Scope & Application

- 1.2.1 Our Policy applies to the HUB24 Group including the subsidiaries and all our directors, officers, employees, and contractors² (Our People).

2. What is Bribery and Corruption

2.1 Bribery is the act of offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Can take the form of money or other items of any value such as non-cash gifts, loans, services, political or charitable donations, employment opportunities or inappropriate corporate hospitality.

- 2.1.1 An example of an act of Bribery is a salesperson giving a client an expensive gift to win business from them.
- 2.1.2 A type of Bribery is a Facilitation Payment which is a small bribe made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement. An example of a Facilitation Payment is a payment to a government employee to process a licence application.
- 2.1.3 A type of Bribery is a Secret Commission (kickback) being a Bribes given in return for facilitating a commercial transaction such as a contract or a loan. An example of a Secret Commission is a portion of a fee from an awarded contract returned by a supplier to the person approving the contract.

2.2 Corruption is the abuse of entrusted power for private gain. An example of an act of Corruption is a business making a political donation with the intent of influencing a political decision, policy or law.

¹ Criminal Code Act 1995 (Cth). Crimes Act 1900 (NSW)

² A reference to a 'contractor' in this policy means an individual who is contracted to work for the HUB24 Group for a minimum of two days per week for at least four weeks.

3. Prohibited Behaviour

3.1 Prohibition on acts of Bribery and Corruption

- 3.1.1 HUB24 prohibits any acts of Bribery and Corruption including Facilitation Payments and Secret Commissions. All our People are strictly forbidden from:
- (a) Offering or accepting bribes;
 - (b) Corrupting or attempting to corrupt a person including a public official or entity;
 - (c) Making or accepting Facilitation Payments; and
 - (d) Paying or receiving secret commissions to or from any person or entity
- 3.1.2 If you are offered or asked to pay a bribe you must report it immediately (refer 5. Reporting Bribery and Corruption).

3.2 Gifts and Entertainment (Government Officials)

- 3.2.1 HUB24 prohibits gifts or entertainment to or from Government Officials or regulatory bodies (other than working lunches, meals or snacks in the ordinary course of business).

3.3 Sponsored Travel for Government Officials

- 3.3.1 HUB24 prohibits the payment of travel and travel related expenses for government officials (unless such payment has been approved by the Managing Director).
- 3.3.2 The Managing Director may grant exceptions to the general prohibition provided:
- (a) The payment is for reasonable and bona fide expenditure properly incurred in relation to travel or travel related activity; and
 - (b) The travel is directly related to the promotion, demonstration or explanation of HUB24's business, products or services or directly related to the performance of a contract with a government or government owned organisation.

4. Other Bribery and Corruption Risk Management

4.1 Dealing with Third Parties

- 4.1.1 When proposing to engage potential service providers, HUB24 must consider the risks relating to Bribery and Corruption. Service providers may include suppliers, agents, distributors, purchasers or contractors.
- 4.1.2 Third parties that pose particular risk to HUB24 of breaching anti-bribery laws include those that operate in developing or emerging economies and are involved in negotiating any business arrangements or transactions with the public or private sector on behalf of HUB24.
- 4.1.3 The executive responsible and the CRO in consultation with the relevant management is responsible for determining which third parties ("high risk third parties") require specific anti-bribery controls.

- 4.1.4 The HUB24 Group Vendor Management Framework provides guidance to our People on dealing with third parties.

4.2 Gifts and Entertainment (Non-Government Officials)

- 4.2.1 HUB24 requires the exercise of a high degree of caution in relation to the offering, giving or receiving of gifts or entertainment.
- 4.2.2 The HUB24 Group Gifts and Entertainment Policy provides guidance to our People on what gifts and entertainment can be offered or accepted and what needs to be declared and reported.

4.3 Charitable Donations

- 4.3.1 HUB24 will only make charitable donations that are legal and ethical under local laws and practices and aligned with our purpose and values. In Australia, this means that a charity must be registered and have appropriate standing with the Australian Charities and Not-for-profits Commission.
- 4.3.2 All charitable donations must be made and approved in adherence with the HUB24 Group Donations Policy.

4.4 Political Functions and Donations

- 4.4.1 Attendance at party-political functions is permitted where there is a legitimate business reason. Attendance at these functions must be approved by the Managing Director. A record of attendance (and the cost of attendance) is to be retained.
- 4.4.2 HUB24 does not make political donations or participate in fundraising events that would reasonably give rise to a perception that HUB24 favours any one political party.

4.5 Political Lobbying

- 4.5.1 From time to time, HUB24 engages in debate on policy and shares its view on policy matters which relate to HUB24's business and activities. This activity may only be done by employees authorised by the Managing Director and must be done in a manner which is consistent with HUB24's values and this Policy.

5. Reporting Bribery and Corruption

5.1 Reporting Bribery and Corruption

- 5.1.1 All identified/suspected acts of Bribery, Corruption, Facilitation Payments and Secret Commissions, regardless of whether a benefit is given or received, must be reported to the attention of a People Leader in the first instance.
- 5.1.2 The People Leader may identify the matter as an Incident as defined by the HUB24 Group Incident and Breach Management Policy in which case it must be managed in accordance with the guidance provided by that policy.
- 5.1.3 Where the acts relate to a HUB24 product with a third-party operator, such as a superannuation trustee or a Responsible Entity, there may be an obligation to notify the third-party.

5.2 Whistleblowers

- 5.2.1 HUB24 is committed to creating a culture that encourages the reporting of unlawful or unethical behaviour which may include suspected Bribery, Corruption, Facilitation Payments, or Secret Commissions.
- 5.2.2 The HUB24 Group Whistleblower Policy provides guidance on reporting wrongdoing to certain designated senior staff of HUB24 in a safe environment where identity and confidentiality are protected.

6. Roles and Responsibilities

Role	Responsibilities
Our People	<ul style="list-style-type: none">• Read and comply with this Policy.• If in doubt, seek advice from the Risk and Compliance function as appropriate.• Undertake training on Anti-Bribery and Corruption and this Policy• Report any instances of non-compliance with this Policy to the Chief Risk Officer.
Group Executive and Managing Director	<ul style="list-style-type: none">• Promote compliance with this Policy.
Chief Risk Officer (CRO)	<ul style="list-style-type: none">• Maintenance of the Policy (including approval of minor amendments from time to time).• Provide oversight of Bribery and Corruption risk.• Determine which external bodies should be notified of any bribery and/or corruption related events.
Risk and Compliance	<ul style="list-style-type: none">• Recommend the Policy to the ARCC for Board approval.• Provide guidance to Our People on compliance with this Policy.• Monitor compliance with the Policy, reporting any issues and risks to the ARCC as applicable.
HUB24 Board	<ul style="list-style-type: none">• Approve this Policy and any material changes to this Policy.
HUB24 Group Audit, Risk & Compliance Committee (ARCC)	<ul style="list-style-type: none">• Recommend the Policy to the Board for approval.• As delegate for the Board, monitor compliance with the Policy and report risks and issues to the Board as applicable.
Subsidiary Boards and Committees of the HUB24 Group	<ul style="list-style-type: none">• Adoption of this Policy.

7. Definitions

Term	Definition
Compliance	Compliance is an ongoing process and the outcome of HUB24 meeting its obligations ³ .
Group Executive	All direct reports of the Managing Director or as otherwise designated a Group Executive by the Managing Director.
HUB24	HUB24 Limited.
HUB24 Group	HUB24, the parent entity of the HUB24 Group of companies, and all of its subsidiaries.
Incident	An incident is any event that results from HUB24 Group's inadequate or failed practices, processes, systems, or controls or an external event that has the potential to adversely impact HUB24 Group, our clients, or our customers. It is not necessary that any financial loss occurs.
Management	Group Executive and their direct reports.
Our People	All HUB24 Group directors, officers, employees, and contractors as well as subcontractors, distributors, and consultants who, as part of their engagement are required to carry out their duties on behalf of the HUB24 Group.
People Leader	Anyone within the HUB24 Group with direct report/s.
Policy	This policy document.
Subsidiaries	Member entities of the HUB24 Group.
Supplier/Third Party/Third Party Supplier	Consultant, contractor, service provider, vendor, or other individual or organisation providing products and services to HUB24.

8. Breach of Policy

- 8.1** A breach of Bribery and Corruption related laws may result in legal or regulatory action including civil or criminal proceedings, the revocation of licences, financial loss, reputational damage to the relevant member of our People and to the HUB24 Group.
- 8.2** Failure to comply with this Policy may be considered a serious matter and may result in disciplinary action against the individual involved. In instances of deliberate or reckless non-compliance, such measures may extend to termination of employment.
- 8.3** Potential or actual breaches of obligations and standards in this Policy must be escalated according to the HUB24 Group Incident & Breach Management Policy.

9. Policy Governance

³ ISO 37301:2021 Compliance management systems — Requirements with guidance for use (First Edition 2021-04).
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9.1 Review Cycle:

- 9.1.1 This Policy is reviewed every two years, or more frequently if there is a significant change to the HUB24 strategy or operating environment.

9.2 Approval:

- 9.2.1 Minor amendments are approved by the Operational Owner; and
- 9.2.2 Major amendments are approved by the HUB24 Board.

9.3 Exemption Authority: Chief Risk Officer.

10. Relevant Documents

10.1 This policy should be read in conjunction with the following HUB24 Group policies:

- 10.1.1 HUB24 Group Risk Management Framework
- 10.1.2 HUB24 Group Risk Appetite Statement
- 10.1.3 HUB24 Group Gifts and Entertainment Policy
- 10.1.4 HUB24 Group Vendor Management Framework
- 10.1.5 HUB24 Group Donations Policy
- 10.1.6 HUB24 Group Whistleblower Policy
- 10.1.7 HUB24 Group Conflicts of Interest Policy
- 10.1.8 HUB24 Group Incident and Breach Management Policy
- 10.1.9 HUB24 Group Code of Conduct