



Anti-Bribery and Anti-Corruption

Group Policy Level 1

Overview: This Policy sets out the Telstra Group Policy in relation to bribery and corruption. This Group Policy is supported by the Anti-Bribery and Anti-Corruption Guidance Document. You are expected to read, understand and comply with both of these documents.

Scope: This Group Policy applies to all directors, employees and contractors of Telstra Group Limited ('Telstra') and its controlled entities (collectively, 'Telstra Group') and any person notified that this policy applies to them, unless an exemption has been granted. If country-specific requirements are inconsistent with any part of this Policy then those laws and local Policy apply instead.

Application: This Policy applies in all jurisdictions in which Telstra operates. Where local law is inconsistent with any provision of this Group Policy, the requirements of the local law and any local policies apply in relation to that part.

Policy Principles

1. At Telstra Group, **we are committed** to operating our business ethically and in line with Telstra Group values and legal and regulatory obligations. **You must** act ethically, and be honest, transparent and trustworthy in all your dealings with others.

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2. We **strictly prohibit** bribes, pay-offs, "facilitation payments" (payments to speed up routine actions), secret, unjustified or inflated commissions, kickbacks and any like payments or improper benefits, whether directly or indirectly, no matter how large or small in value. This applies even if it is legal or common practice in a country.
3. In particular, it is a serious criminal offence to bribe or promise or attempt to bribe a "**Public Official**" directly or indirectly anywhere in the world. The term "**Public Official**" has a very broad meaning and usually includes, but is not limited to, politicians, public servants and any employees or contractors of government entities, companies or utilities, public international organisations (for instance, the United Nations, World Bank) or anyone who is standing or nominated as a candidate for public office.
4. In instances where demands for payments may be accompanied by a form of extortion or threat, the health and safety of our employees is paramount in all circumstances. You should do whatever is necessary to stay safe, and report any such details to your manager and report the incident in the appropriate incident reporting system, such as [Donesafe](#), as soon as possible.
5. If you are engaging a third party to act on behalf of Telstra Group **you must** ensure that they are aware that this Policy applies to them.
6. When merger and acquisition activity is undertaken **you must** conduct a bribery and corruption risk assessment of the target entity, conduct due diligence proportionate to the identified risk and address bribery and corruption risks in the integration of any target entity into the Telstra Group.
7. **We ensure** that accurate books and records are maintained for business transactions as they occur, and we keep them for as long as legally required.

Effective Date: 24 November 2022

Policy Owner: Corporate Affairs & Regulatory Executive

Approval: Board

N.B. This Policy does not form part of any employment contract and Telstra may vary, revoke or replace this Policy from time to time.



8. If you have concerns about a payment or benefit that you have been requested to make or have been given, or about the suspected unethical, illegal or improper behaviour of directors, other employees, contractors or any third party engaged by Telstra Group, **you must** take appropriate action to **report it**. You can make a report under **Telstra's Whistleblowing Policy** which provides a process and protections for Telstra employees and others who have reasonable grounds to suspect misconduct.

Donations and Sponsorship

9. **We must** ensure that any donations or sponsorship that we provide to organisations serve a legitimate purpose, and those organisations are subject to high standards of transparency and accountability.
10. Our contribution **must** always be transparent and properly documented. **We must** ensure the contribution is not considered a bribe, pay-off or kick-back, or be construed as being likely to improperly influence a business or personal outcome.
11. **We must not** make cash donations to political parties. However, legitimate fees to attend events organised by political parties (where those events allow for discussion on major policy issues with key opinion leaders and policy makers) can be made, although these fees can be considered as political donations in some circumstances. Prior to making payment of such fees, **you must obtain** approval from the Government Relations team to ensure they are legitimate and that we report externally where required.

Breach of Policy

Compliance with this Group Policy will be monitored. If you don't comply with this Group Policy you could face disciplinary action. This may include termination of your employment or engagement. If you break the law you may also be personally liable.

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