

# Fraud, Anti-Bribery and Corruption Policy

## Purpose and scope

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Endeavour Group is committed to conducting business with high standards of integrity, honesty, and ethical behaviour.

This policy establishes the principles and requirements for recognising, preventing, detecting and responding to fraud, bribery, and corruption, and forms part of our broader approach to risk management and governance including our Code of Conduct, Gifts & Entertainment Policy, Conflicts of Interest Policy, Whistleblowing Policy, Supplier Code of Conduct and the Fraud, Anti-Bribery and Corruption (FABC) Framework.

This Policy applies to all Team Members (including board members, directors, employees and contractors) and Partners acting for, or on behalf of, Endeavour Group.

## Policy requirements

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### Principles

- Endeavour Group is serious about its commitment to conducting business with integrity. We recognise that fraud, bribery, and corruption are serious criminal offences that carry significant legal, reputational, and financial consequences.
- We do not engage in, tolerate, or ignore any form of fraud, bribery, or corruption.
- We are committed to implementing and complying with measures designed to prevent and detect fraud, bribery and corruption. We expect every Team Member and Partner to comply with all applicable laws and regulations and to proactively understand their responsibilities under this policy and related frameworks.
- We promptly address suspected or actual instances of FABC identified within our organisation, which may include notifying law enforcement or regulators as required.
- Endeavour Group will take appropriate action against occurrences of fraud, bribery and corruption or where Team Members and Partners do not comply with this policy, which may include termination of employment, contract or agreement.
- Where any uncertainty exists regarding the application of this policy, consult with the FABC Officer or refer to the detailed FABC Framework that supports this policy.

### Policy Position

- Team Members and Partners must not give, offer or accept bribes, to persuade someone to act in Endeavour Group's favour, their favour or for the benefit of a third party, including business partners, family or friends.
- Team Members and Partners must not make payments in cash or payments that are unofficial, improper or irregular, either directly or indirectly to Government or Public Officials.
- Political donations for or on behalf of Endeavour Group (or in a personal capacity for Directors and Officers) are not permitted prior to written approval from the Chief Corporate Affairs and Sustainability Officer.
- Other donations, in any form, must never be made in an attempt to influence any decisions or gain an improper business or personal advantage, must not be used to facilitate or conceal bribery.

### Risk Management

- Fraud, bribery and corruption risks are assessed periodically, and the results are used to design, enhance and prioritise controls.
- Ongoing monitoring and assurance activities are undertaken to identify potential fraud, bribery and corruption risks, issues or instances of non-compliance.

<b>Training</b>	Mandatory fraud, bribery and corruption training is delivered to Team Members and completed in accordance with the required training schedule.
<b>Reporting</b>	<p>All Team Members who suspect fraud, bribery, or corruption, must report it immediately to their Line Manager, Team Services, or the FABC Officer.</p> <p>Line Managers must escalate any reported fraud, bribery, or corruption incidents to Team Services or the FABC Officer for investigation as defined in the FABC Framework.</p> <p>Partners or Team Members requiring anonymity should use the channels outlined in the Whistleblower Policy and website below:  <a href="https://australia.deloitte-halo.com/whistleblower/website/EndeavourGroup">https://australia.deloitte-halo.com/whistleblower/website/EndeavourGroup</a></p> <p>All reports are taken seriously and will be reviewed and investigated promptly. Endeavour Group does not tolerate retaliation against individuals who raise concerns in good faith.</p>
<b>Roles and Responsibilities</b>	<p>The Head of External Reporting &amp; Financial Control is the FABC Officer and is the owner of this policy. The FABC Officer’s responsibility includes providing oversight for fraud, bribery, and corruption risks, ensuring that:</p> <ul style="list-style-type: none"> <li>– This policy is appropriately communicated and accessible by Team Members and Partners</li> <li>– Instances of non-compliance are adequately investigated and reported in line with the framework reporting matrix.</li> </ul> <p>Refer to the FABC Framework for detailed descriptions of Team Member roles and responsibilities with respect to fraud, bribery and corruption.</p>

## Policy Definitions

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<b>Bribery</b>	<b>Bribery</b> is the offering, giving, requesting or accepting of a benefit to improperly influence a person’s decisions or duties, whether directly or indirectly, regardless of value or outcome.
<b>Corruption</b>	<b>Corruption</b> is the abuse of entrusted power or position for private gain.
<b>Fraud</b>	<p><b>Fraud</b> is any dishonest activity intended to obtain, or attempt to obtain, money, property, financial advantage or other benefit. It may be perpetrated internally or externally.</p> <ul style="list-style-type: none"> <li>– <b>Internal Fraud</b> is fraudulent conduct committed by Team Members or other insiders with access to organisational systems, information or assets.</li> <li>– <b>External Fraud</b> is fraudulent conduct committed by third parties outside the organisation, including customers, suppliers or other external actors</li> </ul>
<b>Partner</b>	Endeavour Group vendors, suppliers, service supplier agencies, consultants, agents and other <b>third parties who work for or with Endeavour Group</b> or any of its related entities anywhere in the world.
<b>Team Member</b>	Endeavour Group <b>employees</b> (whether permanent, fixed-term or temporary), all Directors (whether executive or non-executive) and contractors.

## Related documents

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### Legislation/regulations

Australian Criminal Code Act 1995  
 Crimes Legislation Amendment Act 2024  
 Corporations Act 2001  
 UK Bribery Act 1010  
 US Foreign Corrupt Practices Act 1977  
 Other relevant legislation / regulations

### Internal documents

Code of conduct  
 Gifts and Entertainment Policy  
 Conflict of Interest Policy  
 Whistleblowing Policy  
 Supplier Code of Conduct  
 Fraud, Anti-Bribery and Corruption Framework  
 Other relevant policies, frameworks and standards

## Policy governance

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Document type	Approver	Reviewer	Owner	Exception Authority	Review Cycle
Group Policy	ARCMC	Chief Financial Officer	FABC Officer	ARCMC	Biennial

## Material policy revisions

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Version	Approval Date	Effective Date	Details
1.0	21/06/2021	23/06/2021	New policy
2.0	24/04/2026	27/04/2027	Review and update policy to reflect 2026 FABC requirements