

Anti-Bribery, Corruption & Fraud Policy



Current from	24 June 2025
Review period	Biennial
Sponsor	Chief Legal and Risk Officer
Approver	The Lottery Corporation Board

Purpose

The Lottery Corporation strictly prohibits bribery, corruption or fraudulent conduct by team members. The purpose of this policy is to set out the principles for:

- recognising and minimising the risk of bribery, corruption or fraud occurring in connection with The Lottery Corporation's operations; and
- the circumstances that may give rise to bribery, corruption or fraud and how to manage them.

Scope

This Policy applies to everyone who works at or for The Lottery Corporation, including all non-executive directors, employees, and contractors (collectively referred to as team members).

Context

What is a bribe?	<p>A bribe is any inducement, reward or item of value offered to a person with the intent to improperly influence that person's actions, decisions, or behaviour. A bribe may seek to cause someone to act dishonestly, breach a law, regulation, or duty of trust, or otherwise behave unethically, whether or not a tangible advantage is gained. This includes any gift or offer to gain commercial, contractual, regulatory or personal advantage.</p> <p>Bribery includes facilitation payments (payments to a public official to secure or expedite government action) and secret commissions (undisclosed payments to an agent or team member). A bribe may be direct or indirect; an example of an indirect bribe is if a bribe is arranged through a third party, such as a business associate or family member.</p>
What is corruption?	<p>Corruption is the misuse of power or position for private gain. This can include dishonest and fraudulent behaviour or bribery.</p>
What is fraud?	<p>Fraud is any dishonest activity causing actual or potential financial loss to any person or entity. This may include:</p> <ul style="list-style-type: none">• stealing, creating or using falsified The Lottery Corporation information.• concealing or destroying The Lottery Corporation information.• using The Lottery Corporation information or your position for an improper purpose and/or personal financial benefit.
What is a gift?	<p>A gift is any tangible item of value, service of value, favour that enhances a person materially, benefit or thing of value including cash. This includes an item, service, favour, benefit or thing given at less than market value.</p>
What is hospitality?	<p>Hospitality encompasses any meal, travel or accommodation, entertainment and vouchers or certificates that can be exchanged or redeemed for corporate hospitality items. This includes attending sporting events, professional conferences, industry summits or other recreational activities,</p>

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What is a personal conflict?	A personal conflict arises when your interests, duties or responsibilities outside of The Lottery Corporation could, or could appear to, affect your decisions or actions at work.
Who is a public official?	A public official includes anyone involved in the service of a government body. Relationships with public officials pose a greater risk of breach of this policy and relevant laws, and as a result may be subjected to greater scrutiny.

Your Responsibilities

The Lottery Corporation has no tolerance for team members engaging in the below:

- offering, promising, giving, requesting, accepting, or agreeing to receive a bribe, whether directly or indirectly. This applies to dealings with both public officials and individuals in private entities;
- offering or making, directly or indirectly, any facilitation payment to a public official;
- offering and/or making a secret commission; or
- engaging in any acts of fraud or corruption.

To enable this, all team members must:

- complete related training, where required to do so; and
- adhere to the processes in place to prevent potential bribery, corruption or fraud as they relate to your role:

Engaging with Third Parties	The Lottery Corporation engages with third parties in a range of circumstances, for example: agents, suppliers, or other contractors. The Procurement Policy is required to be complied with.
Expenses including Charitable Donations	You may need to spend money on business-related expenses. For example, business events or charitable donations to registered charities. The Expense Policy is required to be adhered to. Also all expenses must be approved in accordance with the Delegated Authorities Approval Limits Policy.
Political Donations	The Lottery Corporation may make donations to support political parties or associated organisations. All political donations must be approved, recorded and disclosed in accordance with the Political Contributions Policy.
Gifts & Hospitality	You must not give or accept gifts or hospitality in connection with your role at The Lottery Corporation that may compromise, or appear to compromise, your integrity and objectivity in performing your duties. If you offer or are offered gifts or hospitality in connection with your role at The Lottery Corporation, you must comply with the Gift & Hospitality Standard.
Personal Conflicts	You must identify, report and avoid actual and perceived personal conflicts. Refer to the Personal Conflicts Policy on how to adhere to this.
Accounting and Record Keeping	The Lottery Corporation must keep accurate and complete records of all business transactions. It's the responsibility of all team members to record honestly and accurately all dealings with third parties, customers and business contacts. Refer to the Record Retention Policy on how to adhere to this.
Team Member Onboarding	Prospective team members will be subject to pre-employment background checks relevant to the role requirements. Refer to the Talent Acquisition Guidelines on how to adhere to this.

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How to raise a concern

At The Lottery Corporation, we encourage you to speak up, and report any actual or suspected breach of this policy. If you have any concerns you should take one or more of the following actions:

- notify the person's manager, People and Culture partner or the Internal Investigations team;
- make a report via The Lottery Corporation's whistleblower service (known as Speak Up) at www.speakupthelotterycorporation@deloitte.com.au. Reports to this service may be made anonymously. See the Whistleblower Policy for more information.

Any concerns identified are handled in accordance with the Incident Management Standard and Whistleblower Policy (if the whistleblower service Speak Up is used).

What happens if I breach this policy?

It is your responsibility to understand and comply with this Policy. If you breach this policy, depending on the circumstances and severity of the breach, there can be serious consequences. This can include disciplinary action of different kinds; the most serious being termination of your employment or engagement.

More Information

Resources to help you understand your responsibilities are available on the Risk and Compliance Hub on SquareONE. If you have any questions, speak with your leader, or contact the risk and compliance team via riskandcompliance@thelotterycorporation.com.

Definitions

A glossary of common terms can be found in Collibra.

Policy control

Change History

Amendment Number	Approved by	Date	Description of changes
1	Board	23 May 2022	Creation of TLC Anti-Bribery and Corruption Policy, effective on 1 June 2022 for the demerger.
2	Board	21 June 2023	Annual refresh of the policy – minor amendments to the context and formatting. Frequency of review changed to every 2 years.
3	Board	24 June 2025	Biennial refresh of the policy – amendments made to align with the latest policy template and minor refinements to wording.