

Anti-Bribery, Corruption & Fraud Policy



Purpose

At The Lottery Corporation we expect our people to do the right thing and comply with applicable laws, codes and policies. 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.

Who this policy applies to

This policy applies to everyone who works at The Lottery Corporation including all directors, employees and contractors (**team members**).

Definitions

What is a bribe?	<p>A bribe is any inducement, reward or item of value offered to an individual in order to gain commercial, contractual, regulatory or personal advantage. This involves offering or giving a gift or other benefit to a person with the intention of improperly influencing the recipient.</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 employee). 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 may include any tangible item of value, service of value, favour that benefits a person including cash, property, hospitality or other service given at less than market value or for free.</p>
What is hospitality?	<p>Hospitality may include any meal, travel, entertainment, including attendance at sporting and other events, accommodation, vouchers or certificates which are capable of being exchanged or redeemed for corporate hospitality items.</p>
Who is a public official?	<p>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.</p>

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How we approach Anti-Bribery, Corruption and Fraud

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 of any value 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 Procedure .
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.
Employee Onboarding	Prospective employees will be subject to pre-employment background checks relevant to the role requirements. Refer to the Talent Acquisition Policy on how to adhere to this.

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 or People and Culture partner;
- notify a member of The Lottery Corporation's Investigations team; and/or
- 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.

Investigation of concerns

Compliance with company policies is a condition of employment at The Lottery Corporation. The Lottery Corporation may vary its policies at its discretion from time to time, without prior notice or compensation to employees or contractors, and the content of this policy is not incorporated into any contract of employment or engagement. This policy is current at the date of printing.

Classification: Public

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

What happens if I breach this policy?

It's your responsibility to understand and comply with this policy. The Lottery Corporation treats non-compliance seriously and resulting action could include suspension or termination of employment or engagement with The Lottery Corporation. The Lottery Corporation may also refer the matter to appropriate government or law enforcement agencies.

More Information

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

Policy control

Version Control

Current from	22 June 2023
Review period	Biennial
Sponsor	Chief Legal and Risk Officer
Approver	The Lottery Corporation Board

Change History

Version	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.

Document Hierarchy

Related Policies	Procurement Policy Expense Policy Delegated Authorities Approval Limits Policy Political Contributions Policy Record Retention Policy Talent Acquisition Policy Incident Management Standard Whistleblower Policy
Related Procedures	Gift & Hospitality Procedure
Overarching Associated Policies	Risk Management Policy Compliance Management Policy Code of Conduct