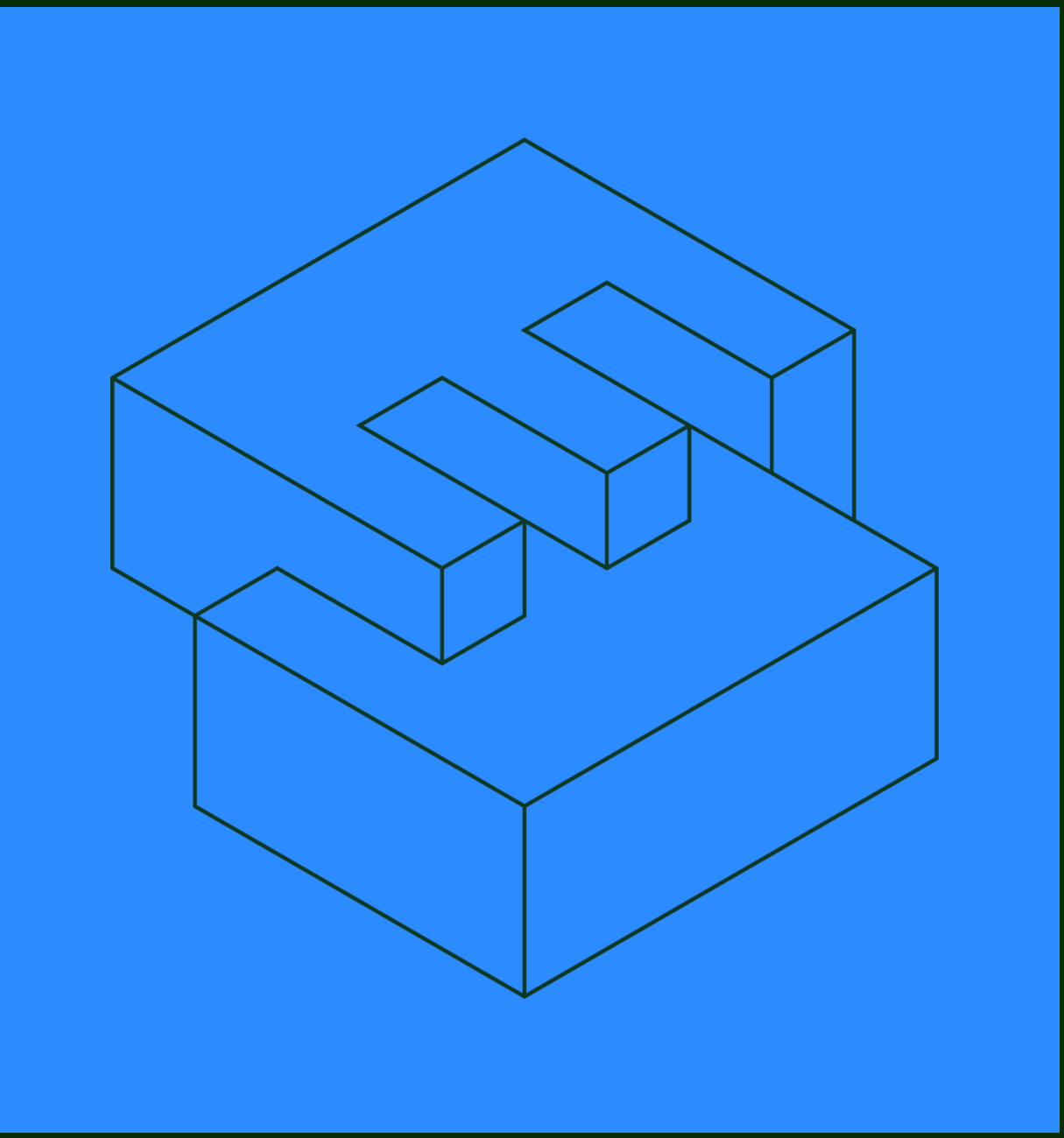
Anti-Bribery and Corruption Policy

May 2026



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1. Introduction

Magellan Financial Group Ltd ("**MFG**") and its related bodies corporate (together "**Magellan**", "**we**", "**our**" or "**us**") is committed to conducting business in an honest and ethical manner.

As part of this commitment, Magellan prohibits any activity that seeks to bribe or otherwise improperly influence a Public Official, or any other individual or entity in the public or private sector, to act (or omit to act) in a way that differs from the proper performance of their role or function.

2. Scope

This Policy applies to all Magellan employees, directors, contractors and interns (collectively, "**Applicable Persons**") as determined by the Chief Risk Officer ("**CRO**") and any other individual acting on Magellan's behalf and should be read alongside other Magellan policies including:

- Gifts, Benefits and Entertainment Policy (which details our policy on providing or receiving reasonable hospitality, gifts or entertainment);
- Conflicts of Interest; and
- Whistleblowing Policy.

It is the responsibility of all Magellan staff to understand and comply with this Policy and to follow the reporting requirements set out in this Policy.

This Policy forms part of Magellan's risk management and corporate governance framework and has been approved by the MFG Board of Directors.

Related bodies corporate may maintain entity-level policies, provided these are consistent with and aligned with this Policy.

3. Key legal obligations

There are a number of laws countering bribery and corruption in Australia including the Australian Criminal Code 1995 (Cth) and Corporations Act 2001 (Cth) (the "**Act**").

In Australia, bribing a foreign public official is an offence under the Criminal Code.

Each State and Territory has legislation criminalising bribery of both public officials and private individuals. The Commonwealth also criminalises the bribery of Commonwealth public officials under Divisions 141 and 142 of the Criminal Code.

In addition, the failure of directors or officers of a company to take proper measures to prevent and detect bribery by employees or other officers may be a breach of their duties under the Act.

There are similar anti-bribery provisions in other countries in which Magellan operates such as in the US.

4. Definitions

Bribery

Bribery is the offer, payment or provision of a benefit (monetary or otherwise) to someone to influence the performance of a person's duty and/or to encourage misuse of his or her authority.

Whether the person sought to be influenced works in the public or private sector is irrelevant. The relevant laws apply to the bribery of Public Officials as well as bribery in relation to any commercial transaction in the private sector.

There is no formal monetary threshold. The benefit provided/offered does not need to be given directly to the relevant person – providing or offering to provide a benefit to, for example, a family member or friend of that person would suffice.

It is also irrelevant whether the bribe is accepted or ultimately paid. Merely offering the bribe is a contravention of this Policy and usually is sufficient for an offence to be committed.

Corruption

Corruption means the abuse of entrusted power or position for private gain. The benefit can be direct or indirect.

Public Official

Any officer or employee of a government body (both foreign and domestic), any person acting in an official capacity for or on behalf of any government or government agency including a member of the military or police force, employees of state-owned enterprises, any officer or employee of a public international organisation and political parties, their officials, and candidates for public office. This definition also includes the direct family of any person designated as a Public Official.

5. Prohibition on bribery and corruption

Magellan will not tolerate any form of bribery or corruption in its business. Magellan prohibits:

- the giving, offering, promising, authorising, accepting or requesting of a bribe;
- the payment of facilitation payments; and
- all forms of corruption.

6. Facilitation payments

In certain parts of the world, it is common for Public Officials to receive so-called "facilitation payments" to expedite or secure the performance of a routine governmental action (for example, to facilitate the expedition of applications for visas or licences).

Magellan does not make facilitation payments of any kind and any requests for such payments are to be reported to the CRO.

7. Gifts and Entertainment

The giving or receiving of gifts and/or entertainment must be in accordance with our Gifts, Benefits and Entertainment Policy which forms part of our Code of Ethics.

In summary, Magellan employees must not accept or provide gifts or entertainment if they could create or appear to create an obligation, a conflict of interest, an inducement to favour the giver in any way, or influence a business decision.

Any gift or entertainment provided to Public Officials must be **pre-approved** by the CRO or her delegate.

8. Political donations

Political donations can be seen as giving rise to particular risks of corruption or perceptions of corruption. Magellan does not make political donations to political parties.

9. Record keeping

False, misleading or incomplete record keeping is a criminal and civil offence.

Magellan's policy is to keep books and records which accurately and fairly reflect, in reasonable detail, the parties, the payment arrangements and the purpose of all transactions and disposition of assets.

We prohibit the making of cash payments to any third party other than documented petty cash disbursements.

10. Employee due-diligence program

We identify any bribery and corruption risks in relation to prospective and existing Magellan employees and directors by undertaking appropriate due diligence screening with the objective of ensuring their identity, honesty and integrity.

For all new Applicable Persons, documentation and verification processes are carried out internally which include national police record checks and bankruptcy checks.

Checks are reperformed periodically for directors and key management personnel.

11. Employee training

Employees receive training on this Policy (and related policies) as part of induction training and annually as part of refresher training.

Any questions relating to this Policy should be directed to the CRO.

12. Consequences of non-compliance

There are serious criminal and civil penalties for both individuals and corporations if found guilty of bribery or corruption.

For Magellan, possible consequences include the imposition of substantial fines and reputational damage. For individuals, possible consequences include significant fines and/or lengthy terms of imprisonment.

13. Reporting bribery and corruption and annual certification

If you become aware of a suspected or actual instance of bribery or other improper conduct, you should immediately report the issue to the CRO or designated delegate.

Alternatively, you may report any concerns in accordance with our Whistleblowing Policy which is available on our internal network and on Magellan's website.

If you are unsure as to whether particular conduct constitutes bribery or related improper conduct, you should ask the CRO.

All material breaches of this policy are reported to the MFG Board of Directors.

On an annual basis, all Applicable Persons must certify compliance with this Policy.

14. Review

This Policy will be reviewed by the CRO every two years or when significant regulatory change occurs.