

ANTI-BRIBERY AND CORRUPTION POLICY

Version 1 – August 2021

1. Policy Statement

- 1.1 Consistent with our core values of integrity and excellence, we are committed to doing business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter bribery and corruption.
- 1.2 As part of this commitment, we will not tolerate any form of bribery or corruption in our business or in those we do business with.
- 1.3 We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate including the Australian Criminal Code 1995 (Cth), the Corporations Act 2001 (Cth) and Australian state and territory anti-bribery legislation and the UK Bribery Act 2010 (“**Applicable Anti-Bribery Laws**”) and expect our Employees (as defined below) to also uphold all Applicable Anti-Bribery Laws.

2. Purpose of this Policy

The purpose of this anti-bribery and corruption policy (“**Policy**”) is to:

- (a) set out the minimum expectations applicable to our Employees in observing and upholding our position on bribery and corruption; and
- (b) provide information and guidance to our Employees on how to deal with bribery and corruption issues.

3. Application of this Policy

3.1 This Policy covers the following entities:

- (a) Platinum Asset Management Limited;
- (b) Platinum Investment Management Limited (“**PIML**”);
- (c) Platinum Asia Investments Limited;
- (d) Platinum Capital Limited;
- (e) Platinum Asset Pty Ltd; and
- (f) Platinum UK Asset Management Limited,
“**Platinum**”, “**we**”, “**us**” or “**our**”.

3.2 This Policy applies to all persons working for us or on our behalf in any capacity, including our employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners (“**Employees**”, “**you**” or “**your**”).

3.3 We expect you to adopt a zero-tolerance approach to bribery and corruption.

4. **Who is responsible for this Policy?**

4.1 The board of directors of each Platinum entity has overall responsibility for ensuring this Policy complies with relevant legal and ethical obligations.

4.2 Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.

4.3 Platinum’s Chief Compliance Officer has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

4.4 If you require further information about this Policy or its application please contact Platinum’s General Counsel.

5. **Prohibition on bribery and corruption**

5.1 Platinum prohibits:

- (a) giving, offering, promising, authorising, accepting or requesting of a bribe;
- (b) the paying or receiving of secret commissions or payments to any person or entity;
- (c) all forms of corruption.

5.2 Bribery means the giving, offering or promising of a benefit (monetary or otherwise) to a person to:

- (a) improperly influence a person to obtain or retain a business or personal advantage; or
- (b) induce or reward the improper exercise of the duties or functions of a person within the public or private sector, including a foreign public official or a Commonwealth public official.

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

5.4 It is irrelevant whether the payee or recipient of the bribe works in the public or private sector. It is also irrelevant whether the bribe is accepted or ultimately paid. Even offering a bribe will be a contravention of this Policy and will usually be sufficient for an offence to be committed.

6. Facilitation Payments and Kickbacks

- 6.1 Platinum does not make, and will not accept, facilitation payments or “kickbacks” of any kind, and facilitation payments must not be paid to anyone on our behalf including to any government official.
- 6.2 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action.
- 6.3 Kickbacks are typically payments made in return for a business favour or advantage.
- 6.4 You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted.

7. Gifts and Entertainment

- 7.1 Platinum’s Gifts and Entertainment Policy sets out our policy on offering or receiving reasonable, proportionate and bona fide hospitality, gifts or entertainment, and forms part of Platinum’s Business Rules of Conduct, which should be read in conjunction with this Policy.
- 7.2 Any questions on Platinum’s Gifts and Entertainment Policy should be directed to Platinum’s Chief Compliance Officer.

8. Political and Charitable Donations

- 8.1 Platinum does not make donations to political parties.
- 8.2 Platinum only makes charitable donations that are legal and ethical under local laws and practices. No corporate donation must be offered or made without the prior written approval of Platinum’s Finance Director.

9. Record Keeping

- 9.1 False, misleading or incomplete record keeping is a criminal and civil offence in Australia and in the United Kingdom.
- 9.2 It is our policy to maintain a system of internal accounting controls and make and keep books and records which accurately and fairly reflect in reasonable detail the parties, payment arrangements and the purpose of all transactions and disposition of assets.
- 9.3 We expect you (and specifically our Employees within our Finance and Investment Operations teams) to:
 - (a) accurately record all accounting entries in reasonable detail to fairly reflect transactions; and
 - (b) periodically review accounting entries and supporting documentation to identify and correct discrepancies, errors, and omissions.

9.4 We do not, and you must not, keep “off-book” accounts to facilitate or conceal improper payments.

9.5 We prohibit the making of cash payments of any kind to any third-party, other than documented petty cash disbursements or other valid and approved payments.

10. **Your responsibilities**

10.1 The prevention, detection and reporting of bribery and other forms of corruption is Platinum’s responsibility as well as the responsibility of all of our Employees.

10.2 As a minimum requirement, we expect you to:

- (a) abide by this Policy and all applicable national and foreign anti-bribery legislation;
- (b) participate in anti-bribery compliance training provided by Platinum;
- (c) avoid any activity that might lead to, or suggest, a breach of this Policy; and
- (d) certify annually in writing compliance with this Policy.

11. **How to Raise a Concern**

11.1 You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.

11.2 Employees must notify Platinum’s Chief Compliance Officer as soon as possible if you believe or suspect that a breach of this Policy has occurred, or may occur in the future.

11.3 Alternatively, you may report your concerns in accordance with our Whistleblower Protections Policy. Please refer to our Whistleblower Protections Policy which is available on the intranet and on Platinum’s website.

12. **Training**

We require all of our Employees to receive periodic anti-bribery and corruption training on all Applicable Anti-Bribery Laws and on this Policy.

13. **Breaches of this Policy**

13.1 Breaches of this Policy may expose Platinum and our Employees to criminal penalties and/or civil action.

13.2 Possible penalties include substantial fines for companies, and, for individuals, imprisonment. Consequences may also include exclusion from tendering for government or private contracts as well as reputational damage.

13.3 If Platinum determines or becomes aware that you have violated any part of this Policy or any Applicable Anti-Bribery Laws, it will immediately terminate its relationship with you.

14. **Availability and Review of this Policy**

- 14.1 This Policy will be made available to all staff on Platinum's intranet and will also be available on Platinum's website.
- 14.2 This Policy will be reviewed every two years, or sooner if there are any changes to Applicable Anti-Bribery Laws which necessitate an earlier review.