



Anti-Bribery and Anti-Corruption

Group Policy Level 1

Overview: This Policy sets out the Telstra Group Policy in relation to bribery and corruption. This Group Policy is supported by the Anti-Bribery and Anti-Corruption Guidance Document. You are expected to read, understand and comply with both of these documents.

Scope: This Group Policy applies to all directors, employees and contractors of Telstra Group Limited ('Telstra') and its controlled entities (collectively, 'Telstra Group') and any person notified that this policy applies to them, unless an exemption has been granted. In this Group Policy, a reference to 'our' or 'we' is a reference to the Telstra Group unless the context requires otherwise.

Application: This Policy applies in all jurisdictions in which Telstra operates. Where local law or country-specific requirements are inconsistent with any part of this Group Policy then those requirements, laws and/or local Policy apply in relation to that part instead.

Policy Principles

1. At Telstra Group, we are committed to operating our business ethically and in line with Telstra Group behaviours and habits and legal and regulatory obligations. **You must** act ethically, honestly, and be transparent and trustworthy in all your dealings with others.

Bribery & Corruption

2. We strictly prohibit the offer or acceptance of bribes, pay-offs, "facilitation payments" (payments to speed up routine actions), secret, unjustified or inflated commissions, kickbacks and any like payments or improper benefits, whether directly or indirectly, no matter how large or small in value. This applies even if it is legal or common practice in a country.
3. It is a serious criminal offence to bribe or promise or attempt to bribe a "**Public Official**" directly or indirectly anywhere in the world. The term "**Public Official**" has a very broad meaning and usually includes, but is not limited to, politicians, public servants and any employees or contractors of government entities, companies or utilities, public international organisations (for instance, the United Nations, World Bank) or anyone who is standing or nominated as a candidate for public office.
4. In instances where demands for payments may be accompanied by a form of extortion or threat, the health and safety of our employees is paramount in all circumstances. You should do whatever is necessary to stay safe and report any such details to your People Leader and record in a central system, as soon as possible. For integrated entities at Telstra Limited, Donesafe should be the default system for this purpose, However, if Donesafe is not accessible an equivalent system must be employed to maintain these records.

Effective Date: 18th February 2025

Policy Owner: SEALRC Executive

Approval: Board



5. If you are engaging a third party to act on behalf of Telstra Group, you must ensure that they are aware that this policy applies to them.
6. When merger and acquisition activity is undertaken **you must** conduct a bribery and corruption risk assessment of the target entity, conduct due diligence, proportionate to the identified risk and address bribery and corruption risks in the integration of any target entity into the Telstra Group.
7. We ensure that accurate accounting books and financial records are maintained for business transactions as they occur, and we keep them for as long as legally required.
8. If you have concerns about a payment or benefit that you have been requested to make or have been given, or about the suspected unethical, illegal or improper behaviour of directors, other employees, contractors or any third party engaged by Telstra Group, you must take appropriate action to report it. You can raise a concern by speaking directly with your People Leader – or other senior leaders in the business – if you're comfortable doing so. You can also report under Telstra's [Whistleblowing Policy](#).

Supplier-funded Benefits

9. Any offered benefits, such as donations, sponsorships, and promotional items, provided or funded by suppliers, partners, or third-party suppliers, to a function or functions, must receive prior approval from the relevant function Group Executive (GE) and notify the Anti-Bribery Anti-Corruption Accountable Executive (AE). Please refer to the Gifts and Hospitality Policy.
10. **You must** not offer or accept any travel and accommodation paid for or offered by any external third party. This process ensures ethical standards are upheld and helps prevent potential conflicts of interest. Please refer to the Gifts and Hospitality Policy and the Conflicts of Interest and Outside Interests Policy.

Donations and Sponsorship

11. We must ensure that any donations or sponsorship that we provide to organisations serve a legitimate purpose, and those organisations are subject to high standards of transparency and accountability. These must be declared in the relevant Company Register.
12. Our contribution must always be transparent and properly documented. We must ensure the contribution is not considered a bribe, pay-off or kick-back, or be construed as being likely to improperly influence a business or personal outcome.
13. We must not make cash donations to political parties. However, legitimate fees to attend events organised by political parties (where those events allow for discussion on major policy issues with key opinion leaders and policy makers) can be made, although these fees can be considered as political donations in some circumstances. Prior to making payment of such fees, you must obtain approval from the Government Relations team to ensure they are legitimate, declare in the relevant Company Register and ensure we report externally where required.

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Breach of Policy

Compliance with this Group Policy will be monitored. If you don't comply with this Group Policy, you could face disciplinary action. This may include termination of your employment or engagement. If you break the law, you may also be personally liable.

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N.B. This Policy does not form part of any employment contract and Telstra may vary, revoke or replace this Policy from time to time.