



Anti-bribery and
Corruption
Statement

 **First Sentier**
Investors

Overview

It is recognised that bribery and corruption have an adverse effect on communities wherever they occur. If endemic, they impede economic growth and undermine accountability, threaten laws, democratic processes and basic human freedoms, impoverishing states and distorting free trade and competition. Corruption is often associated with organised crime, money laundering and, on occasions, the financing of terrorism.

We are committed to securing the financial wellbeing of people, businesses and communities by embedding a culture of zero tolerance to bribery, corruption and facilitation payments across all areas and levels of the business.

Anti-bribery and Corruption Policy

Our Anti-bribery and Corruption Policy supports our zero tolerance approach to bribery and corruption.

Amongst key principles of the Policy, it should be noted that:

- There is a zero tolerance towards bribery, corruption and facilitation payments
- Training and awareness about our zero tolerance for bribery and corruption is conducted
- Business activities must be transparent, sufficiently documented and above suspicion
- There is a Whistleblowing Policy and hotline available for any concerns to be raised
- Due diligence must be conducted and documented with those who are doing business with, or on behalf of, First Sentier Investors
- The Policy principles extend to all employees, directors and contractors

Gifts and Entertainment

Our Gifts and Entertainment Policy and procedures are in place to ensure that employees do not offer or receive gifts or entertainment which could be seen as being inappropriate, be a breach of regulatory obligations, and/or which may give rise to actual or potential conflicts of interest.

