

Anti-Bribery (including Gifts and Hospitality)

Objective/Risk:	Scope:
<p>That a breach of applicable anti-bribery laws (including the failure to prevent bribery occurring) result in reputational damage and severe penalties, including fines and imprisonment.</p> <p>The purpose of this document is to provide clear and consistent rules to prevent both active and passive bribery, as part of TPG Telecom’s anti-bribery programme.</p> <p>The requirements of this Policy demonstrates TPG Telecom’s zero tolerance approach to bribery.</p>	<p>People: this Policy applies to all people at TPG Telecom.</p> <p>When we say TPG Telecom, this includes all the companies that make up the corporate group of TPG Telecom Limited (ASX: TPG).</p> <p>When we say “you” or “our people” we mean:</p> <ul style="list-style-type: none">• <i>Permanent Employees:</i> someone who is employed by TPG Telecom on a permanent full or part time basis under an individual contract or industrial agreement.• <i>Fixed Term Employees:</i> someone who is employed by TPG Telecom on a permanent full or part time basis under an individual contract or fixed term contract for a defined period.• <i>Casual Employees:</i> someone who is employed by TPG Telecom on an hourly basis.• <i>Contractors/ Consultants:</i> someone who is employed and paid by a third party and their services are contracted to TPG Telecom.

Compliance will be monitored on a regular basis and results reviewed by appropriate governance bodies.

Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary actions in accordance with the provisions of the relevant HR policy. Individuals can also be held personally liable by governmental authorities for violations of Anti-Bribery and Anti-Corruption laws.

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1. Definitions

1.1 Anti-Bribery Laws

"**Anti-Bribery Laws**" refers to all laws relevant to bribery and corruption including but not limited to the following:

- a) the Australian Commonwealth Criminal Code Act;
- b) the UK Bribery Act 2010;
- c) the U.S. Foreign Corrupt Practices Act 1977 ("FCPA"); and
- d) all applicable local laws (for example, the Law 231 of 2001 in Italy).

1.2 Bribery

"**Bribery**" means giving or receiving, or agreeing to give or receive, an undue reward, which could be financial or any other type of reward, to influence the behaviour of someone in business or government to improperly obtain or retain an advantage

1.3 Charitable Contributions & Donations

"**Charitable Contribution & Donations**" mean small or large amounts of resources (time, financial, property or human) provided voluntarily to support education, health & wellness, indigent care, the environment and/or other public interest causes. This includes donations to registered charities (charitable contributions) or a non-charitable organization (donation) provided without agreement or intent to receive a tangible benefit in exchange. If funding is provided to a registered charity then the funding is a Charitable Contribution regardless of whether TPG Telcom may receive some tangible benefit in exchange.

1.4 Charitable Organisation

"**Charitable Organisation**" means an organisation recognized as a charity under local law or regulation (e.g. United Way or the Red Cross, e.g. a registered charity (or a charity that is exempt from registration under local law)).

1.5 Congress or conference

"**Congress or Conference**" means a Third Party educational or scientific meeting held at an appropriate location where:

- The gathering is primarily dedicated, in both time and effort, to promoting objective scientific and educational activities and discourse (one or more educational presentation(s)) should be the highlight of the gathering, and;
- The main incentive for bringing the attendees together is to further their knowledge on the topic(s) being presented

1.6 Extortion payments

"**Extortion payments**" are payments made to avoid an imminent threat to an individual's health, safety or welfare. *Sometimes known as "health and safety payments."*

1.7 Facilitation payments

"**Facilitation payments**" are unofficial payments to induce officials to perform or expedite routine functions that they are otherwise obliged to perform. These are often paid in addition to a scheduled official fee and usually involve relatively small sums of money. Under

the UK Bribery Act, facilitation payments are considered bribes and are illegal. *Sometimes known as "grease payments."*

1.8 Gift and hospitality

"Gift" means anything of value given to/received from a third party. Some examples would be branded items (calendars, pens), a bottle of wine, a handset/phone (that is not being used for testing or demonstration), a hamper or festival treats, event tickets with or without a host attending such event

1.9 Hospitality.

"Hospitality" has a broad definition, and is always accompanied (hosted by or provided to a third party) and is for the purpose of corporate relationship building. It includes meals (breakfast, lunch or dinner), events (e.g. tickets to a sporting event, a concert, or a conference), drinks, or any other similar situation

1.10 Internal event

"Internal event" means any event held primarily for TPG Telecom employees only, including Christmas parties, team meetings, strategy days, etc.

1.11 Lobbying

"Lobbying" means TPG Telecom's use of a Third Party to voice, on TPG Telecom's behalf, TPG Telecom's opinions, policy positions or regulatory proposals (formally or informally), with Government Officials. *Sometimes known as 'advocacy'*. This definition also includes those companies who 'fact find' or 'arrange meetings' on our behalf with Government Officials which assist or are complimentary to lobbying activities conducted by TPG Telecom employees

1.12 Government official

"Government Official" means any officer (whether elected or appointed) or employee of a government department who holds a legislative, judicial or administrative position of any kind, even on a non-permanent basis. This also includes: members of the royal family; any person who performs public functions in any branch of the national, local or municipal/regional government; or any person who exercises a public function for any public agency or public enterprise, or private entity controlled by the State, such as employees of state-owned or state-controlled enterprises, or working in state-owned media; members or political parties or candidates for political office. It also includes any official or agent of a public international organisation, such as the UN or the World Bank

1.13 Social media influencer

"Social Media Influencer" means a user on social media who has established credibility in a specific industry. A social media influencer has access to a large audience and can persuade others by virtue of their authenticity and reach

1.14 Sponsorships

"Sponsorships" refer to support for a Third Party event or initiative by providing financial, property and/or other resources, in return for certain commercial benefits, e.g. to promote TPG Telecom's products, brands or corporate interests or in exchange for some tangible benefit.

If such funding is provided to a Charitable Organisation, then the funding is a Charitable Contribution regardless of whether TPG Telecom may receive some commercial benefit in exchange.

1.15 Sales incentive

“**Sales incentive**” means a programme run with suppliers or third party sales agents to reward achievement of sales targets for a particular product or service.

1.16 Site visit

“**Site Visit**” means visits to TPG Telecom or supplier sites by employees, Third Party individuals and/or Government Officials (other than official inspections pursuant to a law or site visits by Government Officials) for educational or fact-finding purposes (e.g. for the demonstration of a manufacturing or research and development process).

1.17 Third party

“**Third Party**” means any external entity or individual, who is not a Government Official, which provides goods or services to TPG Telecom in exchange for remuneration or commercial benefits.

Sometimes Third Parties act on our behalf with Government Officials in any branch of the national, local or municipal/regional government. Examples include, but are not limited to, applications for “right-to-dig” permits, visa applications, retail permits, tax petitions, etc. Such Third Parties are considered to be Higher-Risk Third Parties due to their acting on our behalf with Government Officials

1.18 Zero billed lines

“**Zero-billed lines**” are lines which TPG Telecom provides to third parties/individuals and does not bill for, or provides a 100% discount on the bill – i.e. provides free services such as airtime, data, messaging and any other free TPG Telecom products and services such as Cloud Hosting, IoT etc. They are also called “free lines”, “VIP lines” or “open lines” in some locations

2. The Policy standard

2.1 Unacceptable conduct

The TPG Telecom Code of Conduct clearly outlines TPG Telecom’s zero tolerance to any form of bribery. Set out below are examples of conduct that could amount to an offence under Anti-Bribery and Anti-Corruption Laws. This conduct could also result in an individual or TPG Telecom being liable for criminal penalties, such as fines or prison sentences.

Offering a bribe

Employees or TPG Telecom Third Parties, whether directly or indirectly, must not offer, promise or give cash or anything of value (including a financial or other advantage) to another individual in the public (government) or private sector to influence that person to act improperly or to reward that improper performance. More specifically, employees or TPG Telecom Third Parties must not make an offer, promise or payment even if it is:

- A. made indirectly or through a third party or agent;
- B. considered to be part of the normal course of business within a specific country;
- C. initially suggested by the other person; or
- D. a Facilitation payment.

The only exception is for an Extortion Payment where an individual’s personal safety is at risk. Such circumstances are very rare and extremely uncommon. The incident must be subsequently reported as soon as possible to the employee’s Supervisor and Legal or Compliance. Such payments must be accurately and completely recorded in TPG Telecom’s books and records.

Accepting a bribe

Employees or TPG Telecom Third Parties, whether directly or indirectly, must not request, receive or agree to receive cash or anything of value or any kind of advantage, to encourage or reward the improper performance or functioning of an activity.

Bribing a Government Official

Employees or TPG Telecom Third Parties, whether directly or indirectly, must not offer, promise or give any financial or other advantage, including facilitation payments, to a Government Official or to another person at that Government Official's request so as to influence the Government Official in order to obtain or retain business or any other advantage in the conduct of business. Employees or TPG Telecom Third Parties must not pay any person when it is known or there is reason to know that all or part of that payment will or may be passed on to a Government Official to help obtain or retain business or any other benefit.

Whistleblowing Obligations

It is the duty of our suppliers, contractors, business partners and employees to report any breach of the Code of Conduct, including anti-bribery.

2.2 Gifts and hospitality

In addition to the policy requirements below, there are **global financial thresholds and approval processes** that must be complied with prior to giving or receiving gifts or hospitality:

Country	Gift/Hospitality Limit
Australia	AUD 150
Hong Kong	HKD 700
Japan	JPY 10,800
Malaysia	MYR 300
New Zealand	NZD 120
Philippines	PHP 2,500
UK	GBP 75
USA	USD 125

All gifts and hospitality given and accepted above these financial thresholds must be registered in a "timely" manner on the Gifts & Hospitality Register. Ideally "timely" equates to weeks prior to attendance at any hospitality events should TPG Telecom opt to decline such attendance instead for whatever reason.

Declined invitations and gifts must also be registered in instances where the employee or their manager or Legal or Compliance felt that it was necessary to decline in order to follow any aspect of this Policy Standard (e.g. if it was declined because there was a tender ongoing or because it was felt that the invitation was inappropriate).

Gifts and Hospitality policy requirements

TPG Telecom strictly **prohibits** employees or TPG Telecom third parties from:

- soliciting or requesting gifts or hospitality at any time
- giving or accepting cash or cash equivalents (such as gift cards,

- vouchers, traveler's checks)
- giving or accepting gifts or hospitality during contractual negotiations or a tender process or if aware that one is imminent with either a supplier or customer

Corporate gifts or hospitality must only be offered/accepted when it is reasonable, transparent, infrequent and for the purpose of building business relationships. Where there is any uncertainty, offers, invitations or acceptance of corporate gifts or hospitality from/to third parties should be refused, or returned to the third party or donated to charity via any Foundation of TPG Telecom. If gifts are donated in this manner, the receiver must ensure that the person who provided the gift is advised in writing of the decision.

It is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive an influence. For this reason, employees with a significant role to play in decision making processes for suppliers, including employees in Supply Chain Management, should in principle reject or return all gifts other than low-value, branded items or low-value consumable gifts, such as chocolates. Special rules exist in relation to devices, see [2.2.4](#).

Gifts and hospitality that are frequent and repetitive, regardless of amount should be avoided. Paying for gifts and hospitality personally to avoid having to report or seek approval is inappropriate and strictly prohibited.

2.2.1 Gifts and hospitality to Government Officials

Additional restrictions apply in relation to dealings with Government Officials and family members of Government Officials. It is the responsibility of whoever is requesting the approval to make sure that the proposed spend is permitted under local laws or rules governing the acceptance of corporate gifts or hospitality by such Government Officials and falls within all applicable guidelines, including monetary value. In many instances, by their own rules, Government Officials can only accept gifts that are ceremonial in nature, e.g. an engraved plaque for a ceremony to open a building, etc. Regardless, TPG Telecom prohibits the provision of stand-alone entertainment (such as happy hours or karaoke) to Government Officials and their family members.

Political contributions

TPG Telecom maintains a policy of not contributing financial support to political parties or individual politicians. This includes cash or in-kind contributions and any other form of financial support.

2.2.2 Zero-billed lines

Zero-billed SIMs or 'open-lines' are sometimes offered for legitimate business purposes, such as offering the opportunity for TPG Telecom's network to be experienced or in relation to a specific project. This requires careful consideration and due process to ensure that the practice does not pose a risk of actual or perceived bribery. These lines are considered high-value gifts and should only be provided in accordance with the controls set out in this policy.

The following requirements must be complied with:

- a) Strict eligibility criteria for a Zero-billed Line must be clearly set out and documented, with an overall limit set on number of lines and the value of benefit to the receiver;
- b) An appropriate approval process involving Senior Management must be in place

for approving new lines or changes to existing lines;

- c) A clear, up-to-date list of individuals with existing Zero-billed Lines must be maintained;
- d) All Zero-billed Lines to Government Officials must receive the prior written approval of Legal or Compliance. Zero-billed Lines legally required to be deployed, e.g. for testing (or required by a public tendering process) are exempted from this requirement;
- e) A zero-billed line to a Government Official can never be given to an 'individual'; it must only be assigned to a 'government position' e.g. 'The Minister of Telecommunication'. This requirement means that if the individual with the line retires, resigns or changes role, the Zero-billed Line changes accordingly to the new individual occupying the designated position;
- f) It must be made clear when allocating all lines that the SIM/phone line must only be used by the designated person/Government Official and not by their family or friends;
- g) A monitoring process must be documented locally and responsibility delegated to an appropriate person to conduct regular monitoring and review of appropriate/reasonable usage. An action plan must be maintained to respond to any 'red flags' identified; and

A documented process must exist for 'retiring' or removing a Zero-billed Line if, for example, the individual retires from role, the line is inappropriately used etc

2.2.3 Handsets/Devices, SIMs and other services for testing or demonstration purposes

Devices are legitimately provided **to our employees** by vendors for the purposes of:

1. Testing a new prototype prior to launch (to terminals/technology teams);
2. Seeding devices to enterprise sales/marketing teams for customer technology/device demonstrations etc.; or
3. Seeding devices/demonstrating technology/devices to Senior Management.

In all cases these testing, promotional and demonstration devices remain the property of TPG Telecom or the supplier and therefore under no circumstances is the receiver of such devices to trade them in exchange for personal financial gain.

The provision of trial devices and/or telecommunication services **to business customers** for testing purposes is permitted providing that the following requirements are put in writing to each individual recipient stating that the device, handset, SIM or service:

- is and remains the property of TPG Telecom and is not being supplied as a gift;
- is only being provided on a loan basis only for a specific period of time (not exceeding 3 months for a handset and 6 months for a SIM/other service) and with a defined monthly cap on network usage for a SIM/other service with an obligation to pay charges in excess of that cap; and
- will be returned to TPG Telecom at the end of the trial/loan period or, in the case of a SIM/other service, either cancelled or converted to contract/billing arrangement.

A process must be in place for approving, tracking and pursuing the collection of trial/loan devices and SIMs/ other services (or, for SIMs/other services, cancellation or conversion to contract/billing) at the end of the loan period.

The offer of a handset or device to outside the purposes of testing, promotion or demonstration is rare. On these occasions the handset or device is considered to be a 'gift' and must follow the standard policy requirements for Gifts described above in [2.2.1](#) and [2.2.2](#). Offers of handsets/devices for use by friends and family of employees must always be refused.

2.2.4 Media-related gifts and hospitality

TPG Telecom has a strict policy of **not 'gifting' any device, handset or SIM to members of the media** (such as correspondents and editors) as well as bloggers and others who publish their views about TPG Telecom. Any exceptions to this policy must receive prior approval in writing from Legal or Compliance.

Providing **trial devices or services is permitted** but only as part of an organised trial and for a specific purpose and must follow the same communication and tracking processes as trial devices or services to customers set out in 2.2.3 above.

When considering what level of cap would be appropriate in providing a loan SIM to a member of the media, the following tests should apply:

- is the value cap in line with a typical consumer contract monthly spend and therefore not excessively generous?
- is the net monthly value below the cap relatively trivial in the context of a typical journalist's monthly earnings (e.g. equivalent to around 1% of net earnings) and therefore highly unlikely to be viewed as an inducement which could alter editorial opinion?

In line with the standard hospitality process and requirements covered in [2.2.1](#) and [2.2.2](#), any form of cash payment or payment of cash equivalents (such as gift vouchers) to members of the media or bloggers is expressly prohibited, regardless as to the purpose.

Where TPG Telecom plans to pay for or reimburse local travel or hospitality costs (for example, to attend staged product launches, the associated expenses must be:

- directly booked by TPG Telecom, e.g. airfare, hotel;
- in accordance with our employee Expense Policy
- reasonable and proportionate;
- submitted in writing;
- supported by receipts e.g. Uber to/from the event; and
- settled via standard company payment mechanisms where not booked directly (e.g. Uber reimbursements) rather than refunded in cash or cash equivalents.

TPG Telecom must not offer to pay for or reimburse (either partially or fully) the international travel and hospitality costs incurred by media or bloggers (for example, to attend a TPG Telecom event in another country).

2.2.5 Internal events – use of external funding or marketing support

This section of the policy provides clarity on when it is acceptable for TPG Telecom to accept financial support from suppliers in relation to events. TPG Telecom is committed to ensuring that our interactions with suppliers are always transparent. We never accept or request anything that will influence business decision-making processes, or cause others to perceive an influence.

For this reason, **it is prohibited for a supplier to sponsor or fund an internal TPG Telecom event** (an event held primarily for TPG Telecom employees only, e.g. a team Christmas party). The only two exceptions are:

1. events required to discuss or launch a business proposition which is co-branded or co-developed with a supplier and held for customers but also attended by employees, and;
2. events that train or brief TPG Telecom staff on new products and services offered by an external supplier(s).

Use of marketing funds and supplier funding of external events

Marketing funds should always be used appropriately for external-facing promotion and with the requisite approvals. Supplier funding or contributions to external-facing marketing campaigns for co-branded products is permitted provided the funding is approved internally by Marketing Senior Management.

Marketing Senior Management must ensure that the supplier directly notifies Supply Chain Senior Management of any such monies paid by the supplier towards an event.

2.2.6 Sales incentives and commissions

All third-party sales incentives/commissions including those offered by suppliers/device providers to TPG Telecom employees, and also those offered by TPG Telecom to Third Party sales agents/intermediaries, must be pre-approved by Finance Senior Management before being implemented.

The incentive/ commission offered must be appropriate, and cannot be so valuable that there is a risk that employees or Third Party sales intermediaries may be improperly influenced, or perceived to be improperly influenced, to inappropriately promote handsets/other products to customers, and put the incentive/commission ahead of our customers' interests. Third party sales incentives schemes for employees must not include international travel as a reward.

A local process must be in place to ensure that commission payments and sales incentives are consistent with contractual agreements, relate to well-defined and identifiable services that have actually been performed and are properly documented.

The incentive cannot go directly from the handset manufacturer/other supplier to the TPG Telecom employee (or from TPG Telecom directly to employees of sales agents/intermediaries); it must go through TPG Telecom. The money going into TPG Telecom/out to employees must be fully and accurately recorded, and must go through normal methods, e.g. payroll.

2.2.7 Gifts provided by TPG Telecom to employees

See the employee Expenses Policy.

2.3 Sponsorship and Donations

As a responsible company, TPG Telecom supports:

- sharing the benefits of communications technology as widely as possible;
- protecting the natural environment; and
- supporting the communities in which Vodafone customers, employees, investors and suppliers live.

Donations

Donations **can only be made through any Foundation of TPG Telecom**, and all donations given must comply with the Foundation's requirements.

Supplier Donations

There are a number of important requirements that must be complied with if an employee or group of employees would like to request a donation from a supplier as part of a charitable event.

1. Supplier donations can never be requested or used to cover the costs of an employee participating in a charitable event. This means donated funds cannot be used to cover participation costs such as flights, transport, accommodation, meals, equipment etc. Such costs must be covered by the employee;
2. Employees who are involved in the process for deciding whether to give a supplier or type of supplier a contract or work cannot approach those suppliers for donations under any circumstances; and
3. Normal policy considerations apply when considering the amount and frequency of the supplier donation. The request must be reasonable, proportionate, infrequent, and transparently documented. If there is any uncertainty, donations should be refused or returned.

It is the responsibility of the employee(s) requesting the donation to ensure that these obligations are complied with.

Sponsorship

Any payments for sponsorship of community events and initiatives for the purpose of brand exposure, including branding rights and advertising costs or business development must be offered with transparency and in accordance with the principles set out in this Policy. Sponsorships must not be offered to a party with whom we are under contractual negotiations or a tender process or if aware that one is imminent and as such must be reviewed/approved by Supply Chain and Sales Senior Management prior to such sponsorship agreement.

All events or initiatives for which sponsorships, branding rights and advertising costs are provided must be:

- A. openly requested;
- B. permitted by all applicable law;
- C. compliant with TPG Telecom's delegation of authority;
- D. approved by Marketing Senior Management, Supply Chain and Sales Senior Management;
- E. accurately recorded in TPG Telecom's books and accounting records,
- F. transparently documented in an agreement, which contains an anti-bribery clause.

Any events where TPG Telecom hosts third parties/individuals at such events (e.g. Sydney Film Festival, etc.) must also comply with all gift and hospitality requirements set out in [2.2.1](#) and [2.2.2](#). Approval and registration such individuals attending these events potentially receiving such gifts and/or hospitality are centrally coordinated by Sales and Regulatory Senior Management.

2.4 Lobbying

A lobbyist must only be appointed following the completion of the supplier qualification and screening process and robust and documented due diligence. The due diligence must cover the ethical practices of that potential lobbyist, and also consider any potential conflicts of interest, to ascertain any links to Government Officials and assess potential risks.

All lobbyists may only be appointed by written contract and in compliance with the following requirements:

- a. The agreement is in compliance with TPG Telecom’s Delegation of Authority;
- b. The services to be provided are comprehensively and transparently documented;
- c. Appropriate (not excessive) remuneration is set out for the services referred to above and benchmarked as appropriate to ascertain reasonableness;
- d. The anti-bribery lobbyist clause has been included in the agreement; and
- e. Legal or Compliance have been informed of any new appointments, so that the central lobbyist register can be updated accordingly
- f. The External Affairs Director has approved the appointment prior to engaging with the lobbyist

It is the responsibility of the employee(s) requesting the lobbying services to ensure that these obligations are complied with.

2.5 Media and advertising

For guidance on gifts, hospitality and travel for media individuals please refer to section [2.2.5](#) above.

Media influence

TPG Telecom’s zero tolerance of bribery has a specific application with regard to media and bloggers. Members of the media, bloggers and others who publish their views on TPG Telecom must never be offered or provided with any benefit of monetary or commercial value in order to obtain favorable editorial coverage (**apart from advertorials** covered below) and/or to damage the reputation of a competitor.

TPG Telecom must take specific measures to avoid the impression of undue commercial media influence when commissioning an 'advertorial' (a paid advertisement written in the style of an editorial article) or paying a Social Media Influencer to support a TPG Telecom initiative, e.g. must say ‘sponsored by TPG Telecom’ or words to that effect

3. Guiding Principles & Procedures to prevent bribery

We have specific procedures in place to prevent bribery and support an ethical culture within the business in accordance with the principles specified below. These procedures must be proportionate and tailored to the risk of bribery in each area of the company, including country risk and business operational risk

3.1.1 Compliance reporting

All Anti-bribery Champions must comply with TPG Telecom reporting requirements accurately, within appropriate time limits and with a sufficient level of detail to allow the bribery risk and the current implementation status of the anti-bribery programme to be assessed effectively.

3.1.2 Other relevant documents

Code of Conduct
 Supplier Code of Conduct
 Expenses Policy
 Delegation of Authority

Version:	Effective Date:	Policy Owner:	Approval:
2.0	30/06/2020	GM Risk and Audit	Sean Crowley