



PricewaterhouseCoopers  
Australia

# Anti-Bribery and Corruption Policy

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## **1. Purpose**

Our Code of Conduct (the Code) provides a framework for us to do the right thing and behave in a manner that is consistent with our purpose and values. It's important that all of our people know and understand the Code. This policy highlights your responsibilities in preventing bribery and corruption.

## **2. PwC's zero tolerance approach to corruption**

PwC Australia is committed to conducting all business dealings with integrity, transparency, and in full compliance with applicable anti-bribery and corruption laws.

## **3. Who does the policy apply to?**

All directors, officers, partners and employees of PwC Australia, and any agents and independent contractors (including subcontractors) engaged in relation to any matter on behalf of PwC Australia.

## **4. What is my role in protecting PwC Australia from bribery and corruption?**

You should never solicit, accept, give or offer, either directly or indirectly, anything of value (including a gift, personal favours, benefits, travel, entertainment or services, including to family members) that could be perceived to compromise the recipient's integrity or objectivity. Secret commissions, facilitation payments, bribes or kickbacks of any kind are also unacceptable. Receiving or giving gifts and hospitality are prohibited to assurance clients and restricted for other clients per the Gifts and Entertainment Policy.

You will not be penalised if you perceive a danger to a person's liberty or personal safety arising from a demand for a payment and make that payment, provided you report the payment to OGC and Risk Management immediately (subject to any practical obstacles arising from a danger to your liberty or safety). This includes ransom payments. Your report must describe the circumstance and payment made or demanded and include sufficient detail to enable PwC to conduct appropriate due diligence on the payment. Before a ransom payment can be made, you must first consult the OGC team to ensure the payments is not being made to a sanctioned person or entity. You will not be penalised if you refuse to make an improper payment – including if this means the firm does not receive a business advantage, or suffers a disadvantage, as a result.

If you are an engagement partner, you need to inform your engagement team of:

- specific anti-corruption clauses in engagement contracts
- client policies about gifts and entertainment related to the client engagement.

You must comply with your obligations regarding bribery and corruption, as outlined in the Code of Conduct, Network Risk Management Policy, this policy and all other relevant guidelines.

## 5. What is a bribe?

**Bribery** is offering, giving, accepting or soliciting an improper inducement to someone exercising authority in order to influence their judgement or behaviour. A bribe can be paid directly or indirectly (i.e. via a third party such as a contractor or a family member). It can be for the benefit of someone other than the person who is being improperly influenced. In addition, bribery may still occur even if no money or other consideration changes hands.

Bribes can be in the form of money, special privileges, gifts, personal favours, benefits and services (refer to the Gifts and Entertainment Policy for more details). They can also be in the form of giving preferential treatment to relatives, friends, or other individuals with close ties to clients, suppliers, government agencies or officials, regulators, professional bodies and other influential organisations; for example, by favouring them in recruitment decisions or giving some other advantage (recruitment includes temporary unpaid work experience).

There are certain times when you need to be particularly vigilant to the real or perceived risk of bribery. These include when you are:

- proposing for an engagement
- forming judgements on a contentious issue
- dealing with tax officials regarding client tax positions and settlements
- applying for visas or other government clearances
- working in regions or countries that are unfamiliar to you
- filing and processing documents with government departments (eg. requests for speed payments and ‘tea’ money)
- engaging consultants or advisers, particularly for interacting directly with government officials
- engaging sub contractors to deliver services on behalf of the firm
- working in a country where facilitation payments are considered normal business practice, or which have a high International Corruption Perceptions Index score.

## 6. How do I determine if a gift is appropriate?

Refer to the Gifts and Entertainment Policy for more details.

## **7. Can I receive a discount from a supplier or a client?**

Discounts can be accepted if they are equal to those offered to similar organisations or individuals. You should consult with the Independence Office regarding any proposed discount arrangements with audit clients.

## **8. Is a facilitation payment allowable?**

No, facilitation payments are not allowed. Under this policy, facilitation payments are considered payments in cash or kind of small value provided to local officials to perform routine, obligatory government actions (such as processing work permits and visas, issuing licences, delivering mail, arranging utilities connections, etc). Legitimate administration fees or legitimate payments for fast-track services that are paid to an organisation (not to an individual) and where a receipt may be issued on request are not considered to be facilitation payments.

## **9. Can I make charitable donations?**

You must get prior approval before making any charitable donations or agreeing sponsorship, whether made in cash, uncharged time or other form, using PwC Australia resources. No charitable donation or sponsorship can be provided to circumvent the requirements of this policy or other relevant policies including the Gifts and Entertainment Policy.

## **10. How do I ensure that a third party I am working with is not involved in bribery?**

Consider carefully the risk of bribery in any engagement where a third party is involved, either in winning the engagement or in delivering services as part of the engagement. In particular, consider the business reason for engaging the third party, their reputation and past history of ethical conduct, and whether the amounts to be paid for their services are appropriate.

## **11. How do I determine if accepting or providing entertainment is acceptable to the firm?**

Refer to the Gifts and Entertainment Policy for more details.

## **12. What other considerations might impact the acceptability of entertainment?**

Refer to the Gifts and Entertainment Policy for more details.

## **13. How do I learn more about combatting corruption?**

There is a global eLearn for you to view: Combatting Corruption and Money Laundering.

## **14. Who do I speak to if I suspect bribery or corruption, am in doubt or have questions?**

You must report any suspected bribery or corrupt practices to the engagement partner, or OGC or Risk & Quality or report a concern by phone or online via the PwC Ethics Helpline.

If there is any doubt about the acceptability of a gift or entertainment you should consult, as appropriate, with the engagement partner, Risk & Quality, Independence or report a concern by phone or online via the PwC Ethics Helpline.

PwC Australia also has a centralised Compliance function responsible for ensuring adherence with this policy that can provide guidance on relevant issues.

### **15. What are the consequences of a breach of this policy?**

Bribery and corruption are serious offences that can result in criminal and civil penalties for individuals and PwC Australia. They can also cause significant reputational damage and undermine trust in PwC Australia.

PwC Australia does not tolerate bribery or corruption in any form. Failure to comply with the relevant policies on bribery and corruption (including the Code of Conduct, Network Risk Management Policy and this policy) may result in disciplinary consequences including termination of employment. Refer to the Consequence Management Policy for more details.

### **16. Will I be protected from retaliation if I report bribery or corruption?**

PwC Australia does not tolerate retaliation. It has protections in place against detrimental conduct for those who report or assist in an investigation.

The Whistleblower Policy outlines statutory protections available for Whistleblowers. Outside of the Whistleblower Policy, PwC Australia can take appropriate measures, including but not limited to, protection of identity and changing of reporting lines or teams.

### **Political donations**

PwC Australia prohibits making donations to political parties, politicians, candidates for office or party officials, including monetary and in-kind donations, even where permitted by law.

### **18. What happens if I fail to comply?**

If a political donation is made on behalf of PwC Australia in breach of this policy, the firm reserves rights to have the partner or staff member involved personally liable for the amount of the donation. You may also face further disciplinary action.

Any breach of this policy should be reported to the Chief Risk and Ethics Leader or through the firm's Ethics Helpline.

**19. Can I contribute to an entity that is not a political party, politician, candidate for office or party official?**

The law differs by jurisdiction, but payments to third party organisations or entities associated with the political process may constitute a political donation. If in doubt, seek advice from the Chief Risk and Ethics Leader in advance of committing to such an engagement.

**20. Can PwC host events for politicians?**

No. PwC facilities cannot be used to host events for political parties, politicians, candidates or party officials as this constitutes an in-kind donation.

**21. Do personal donations count?**

No. Any PwC person may contribute their own money to political parties, politicians, candidates or party officials in a personal capacity.

**22. Can I participate in an election campaign?**

All PwC partners and staff are free to contribute volunteer labour in their own time, for instance by handing out how-to-vote cards at polling places, provided their contribution does not imply endorsement by the firm.

Partners should take particular care to avoid involvement in election campaigns. In advance of elections, partners should avoid costing or verifying policy commitments or commenting publicly on potentially contentious policies.

PwC people who are actively considering standing for elected office at any level of government must contact the Chief Risk and Ethics Leader.

**23. Who do I contact with further questions?**

If you have any questions in relation to this policy, please contact Head of Strategy and Regulatory Engagements.



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At PwC Australia, our purpose is to build trust in society and solve important problems. PwC is a network of firms in 149 countries with more than 370,000 people who are committed to delivering quality in assurance, advisory and tax services. Find out more and tell us what matters to you by visiting us at [www.pwc.com.au](https://www.pwc.com.au)