

Anti-Bribery and Corruption Policy

Netwealth Group Ltd

ABN 84 620 145 404

Level 6, 180 Flinders Street
Melbourne VIC 3000

PO Box 336
South Melbourne VIC 3205

Netwealth Group Limited

Approved and adopted by:

- Netwealth Group Limited (ABN 84 620 145 404) on 12 November 2025
- Netwealth Investments Limited (ABN 85 090 569 109) (AFSL 230975) on 12 November 2025
- Netwealth Superannuation Services Pty Ltd (ABN 80 636 951 310) (AFSL 528032) (RSE Licence L0003483) on 13 November 2025

Document classification: General Use

This document is for general use. Modification of content is prohibited unless you have Netwealth's express prior written consent.

Document control:

Document owner	Chief Risk, Legal and Governance Officer
Frequency of Review	Biennial
Date of next scheduled review	October 2027 (unless required earlier)
Regulator(s)	APRA, ASIC, AUSTRAC and ASX
Legislative framework	• Criminal Code Act 1995 Cth • Corporations Act 2001 (Corporations Act) • ASX Corporate Governance Principles and Recommendations (4th edition) • Anti-Money Laundering and Counter-Terrorism Financing Act 2006

1.0 Document overview

1.1 About the document

The Anti-Bribery and Corruption Policy (**the Policy**) is applicable to Netwealth Group Limited (**NWL**) and its subsidiaries, including Netwealth Investments Limited (**NIL**) and Netwealth Superannuation Services Pty Ltd (**NSS**), together known as "**Netwealth**". Netwealth is committed to maintaining a high standard of integrity and good corporate governance. We have zero tolerance for any illegal acts of bribery or corruption and are committed to fully investigating such acts. This Policy aims to raise awareness of bribery and corruption prevention, and to communicate the approach to the detection, reporting, investigation and rectification of such events and conduct.

The Policy forms part of Netwealth's Risk Management Framework (**RMF**) and is used to inform Employees of their duties while working at Netwealth. Netwealth requires all Employees to act fairly and efficiently with others. Effective bribery and corruption control requires the commitment and involvement of all Employees, contractors, customers and external service providers. It is therefore imperative that all Employees are aware of, and can recognise, the types of illegal behaviours that may occur and understand the risks posed to Netwealth. Netwealth encourages openness and will provide support to those who raise genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

1.2 Roles and responsibilities

The following table sets the roles and responsibilities of those involved in implementing and monitoring the Policy.

Role	Responsibilities
NWL / NIL / NSS Board(s) (the Board)	• Review and approve the Policy; • Oversee Bribery and Corruption risks and issues in accordance with the Policy; and • Overall responsibility for the Bribery and Corruption Control resources and monitoring.
NWL/NIL Compliance and Risk Management Committee (CRMC) / NSS Audit, Risk and Compliance Committee (ARCC)	• Monitor compliance with the Policy and report risks and issues to the Board as applicable; • Review and provide feedback on the Policy to R&C; and • Recommend the Policy to the Board for approval.
Executive team (Executive)	• Proactively promote the principles of and compliance with the Policy; • Report any breaches of the Policy to R&C and P&C; • Have Controls in place, which are monitored and managed to mitigate Bribery and Corruption risks; • Assist as directed, with the investigation of any suspicious activity; and • Refer any reports of suspected and/or actual Bribery or Corruption to R&C.
Office of the Trustee (OTT) (for superannuation matters)	• Review the Policy on behalf of Netwealth Superannuation Services Pty Ltd.
Risk and Compliance (R&C)	• Recommend the Policy to the CRMC and ARCC for Board approval; • Keep informed on the latest trends, guidance and publications;

Role	Responsibilities
	• Monitor day to day compliance with the Policy, reporting issues and risks to the CRMC/ARCC as applicable; • Implement and educate Employees to support their understanding of the principles of the Policy; and • Conduct investigations into reported allegations of bribery or corrupt activities by Employees.
People and Culture (P&C)	• Provide support in connection with disciplinary actions where required, which may include issuing a warning to or dismissal of the Employee; and • Refer any reports of suspected and/or actual Bribery or Corruption to R&C.
Employees	• Follow the guidelines of the Policy; • Act with honesty and integrity; • Be alert to suspicious activity and report any actual or suspected breach to the Executive, P&C or R&C, immediately; and • Complete mandatory training on Anti-Bribery and Corruption.
Internal Audit	• Review (as required by the Board) the adequacy of this Policy and Controls; and • Immediately inform R&C of any suspected Bribery or Corruption.

1.3 Definitions

Definitions used in this Policy are limited to those terms referenced in the body of the Policy. For additional definitions relating to gifts, entertainment, and not-for-profit contributions, refer to the Gifts and Entertainment Management Standard.

Term	Definition
Bribe/Bribery	Anything of value given, offered, promised, accepted, requested or authorised (directly or indirectly) with the intent to improperly influence a person's actions or decisions, resulting in an undue advantage, benefit or outcome.
Control	An action or mitigant used to reduce either the likelihood and/or impact of a risk event occurring.
Corruption	Dishonest activity in which an Employee acts or attempts to act contrary to Netwealth's interests, and abuses or attempts to abuse their position of trust to achieve personal gain or advantage for themselves or another person or entity.
Employee	All Netwealth temporary Employees, permanent Employees, contractors and Directors.
Facilitation Payment	A minor unofficial payment to a government official to expedite a routine action. These are prohibited except where expressly permitted by law and with prior written approval from the Chief Risk, Legal and Governance Officer
Kickback	A form of negotiated commercial bribery where a payment or 'anything of value' is given to an individual as a reward for awarding or fostering business.
Third Parties	Any contracted supplier of services, systems or technology to Netwealth.
Whistleblowing	The act of exposing any kind of information or activity that is a Disclosable Matter.

2.0 Bribes and Corruption

2.1 Prohibited conduct

This Policy prohibits Employees from using their position and the power of that position for personal gain or advantage for themselves or another person or entity. The Policy applies to Employees regardless of whether they are on leave or are located outside of Australia at the time of such conduct.

All Employees are required to make a clear distinction between the interests of Netwealth, its stakeholders and their private interests, and must avoid actions that could result in potential conflicts. This includes, but is not limited to, the misuse of privileged information, misrepresentation of information or conduct related to other reportable issues.

Employees should refer to the Group Conflicts Management Policy and/or the NSS Conflicts Management Policy for more information on how to identify, disclose and manage any actual, potential or perceived conflict.

This Policy prohibits Employees from offering or receiving a Bribe, Kickback and / or engaging in any act that could be considered money laundering.

Facilitation Payments are prohibited under this Policy except where expressly permitted by law and with prior written approval from the Chief Risk, Legal and Governance Officer.

Employees should consider the purpose and particularly the recipient of any payment and seek guidance from R&C if they are unsure about Facilitation Payments.

Where suspected or actual bribery, corruption or illegal activity is detected, these are to be reported to R&C, P&C, a member of the Executive or via Netwealth's Whistleblowing channels.

Exception – Payments Under Duress to Protect Personal Safety

In exceptional circumstances where an employee faces an immediate and genuine threat to their personal safety, and no reasonable alternative exists, a payment may be made under duress to remove the threat. This exception applies only when:

- The payment is strictly necessary to protect life or physical safety.
- The amount paid is the minimum required to remove the threat.
- The employee (or their manager, if possible) notifies the CRO as soon as practicable after the employee is safe.
- A full written report is submitted to the CRO detailing the circumstances, amount, recipient, and justification for the payment.

Such payments must never be used to obtain or retain business or any improper advantage and must comply with all applicable Australian laws, including the Criminal Code Act 1995 (Cth).

3.0 Gifts and Entertainment

Bribery can sometimes occur when gifts, offers of entertainment, travel, hospitality or donations are given or received. No gifts, entertainment, travel, hospitality, donations (including not for profit contributions) or other expenditure may be provided with the intent to obtain an improper advantage.

Netwealth does not permit Employees to accept work-related gifts valued over \$300. Offers to attend events or entertainment are only permitted in certain circumstances, and subject to approvals as set out in the Gifts and Entertainment Management Standard.

Employees must never ask clients, customers or Third Parties for gifts, entertainment or to support personal fundraising efforts.

Gifts in the form of cash, loans, securities or their equivalent are prohibited and may not be offered or accepted. It is also prohibited to offer or accept gifts or entertainment from government officials or regulatory bodies, e.g., ASIC or APRA, other than working lunches in the ordinary course of business.

Netwealth requires that all Employees apply caution before accepting any offer of a gift or entertainment.

Netwealth has specific policies and management standards in place to protect Employees and Netwealth which include:

- (a) Group Conflicts of Interest Policy
- (b) NSS Conflicts of Interest Policy
- (c) Gifts and Entertainment Management Standard.
- (d) Group Whistleblowing Policy

4.0 Political expenditure and association

Netwealth has zero tolerance for political Bribery and Corruption. Netwealth does not make political donations in any country to any political party, politician, government official or candidate for public office in the form of a financial payment, cash or money, that would reasonably give rise to a perception that Netwealth favours a specific political party. This includes any political or lobbying related expenditure such as sponsorships, memberships, payments to attend political events or gifts or entertainment to be given to political stakeholders or senior government officials. No gift, entertainment or hospitality is to be offered to any government officials or regulatory bodies other than working lunches, coffees, etc in the course of business (for example, the provision of a sandwich (or similar) lunch, morning tea, and afternoon tea during a Regulator site visit).

Attendance at political functions on behalf of Netwealth is permitted where there is a legitimate business reason. Attendance at these functions must be approved by both the Employee's relevant Executive and the CEO & Managing Director (CEO). A record of attendance (and the cost of attendance) is to be provided to, and maintained by, R&C.

Netwealth does not participate in activities intended to influence the outcome of elections in any country.

Any dealings with political parties, politicians, government officials or candidates for public office undertaken by Netwealth which relate to its business activities must be conducted at arm's length to avoid any perception of gaining an advantage.

Employees may have involvement with political parties in their own personal capacity; however, they must not engage in such activities purporting to be on behalf of Netwealth, or express that their views are the views of Netwealth.

4.1 Not-for-profit contributions

Netwealth facilitates ways for Employees to support causes and not-for-profit organisations of their choice and encourages Employees to volunteer. Employees are also encouraged to take part in fundraising across the business and to select those not-for-profit organisations their fundraising is to support. Netwealth will often match donations made by Employees to these not-for-profit organisations. Please refer to the Gifts and Entertainment Management Standard for further detail on Netwealth's requirements for not-for-profit contributions.

5.0 Risk management, prevention and detection

This Policy forms part of Netwealth's RMF and as such Netwealth seeks to put in place Controls which assist in the prevention and detection of Bribery and/or Corruption. Information in relation to how Netwealth does this is for internal use only. Employees involved in such risk management and Control planning should refer to Netwealth's Fraud Control Plan.

6.0 Reporting

All identified/suspected acts of Bribery, Corruption, Facilitation Payments and Kickbacks, regardless of whether a benefit is given or received, must be reported directly to:

- A member of R&C; or
- A member of the P&C team; or
- The Executive; or
- through Netwealth's Whistleblower channels.

7.0 Training

Netwealth provides annual training on this Policy to all Employees, excluding Directors. New Employees are provided this training as part of the onboarding process. Records of completed training sessions are maintained by the Learning & Development team. Failure to complete training is considered a breach of this Policy.

8.0 Whistleblowing

If an Employee suspects that a reportable matter has occurred or is occurring the Employee may also raise their concerns in accordance with the Netwealth Group Whistleblowing Policy.

9.0 Record Keeping

The phrase "record keeping" is broad and can include invoices, financial statements, bank account statements, ledgers, Board minutes, journal entries, and documents concerning transactions with third parties. Netwealth must keep financial records and appropriate evidence in place which details the nature and purpose of transactions with third parties. All records must be full, fair, accurate and understandable to reflect all transactions, use and disposition of assets and other similar information. Netwealth must not make any cash payments to a third party under any circumstance.

10.0 Breaches of this Policy

Netwealth takes its Bribery and Corruption obligations very seriously, as organisations involved in Bribery and Corruption may incur serious criminal and civil penalties, along with reputational damage.

Breaches of this Policy may lead to investigations, temporary suspension, disciplinary action and in serious cases, dismissal, in accordance with Netwealth's Misconduct, Underperformance and Consequence Management Standard. Breaches of this Policy may also result in external reporting to regulators in accordance with the Incident, Issue and Breach Handling Policy.