

Anti-Bribery and Corruption Policy

Introduction and purpose

Future Generation Investment Company Limited (ABN 97 063 935 553) (referred to as 'Future Generation Australia', 'we', 'our' or 'the Company') has zero tolerance for bribery, corruption and fraud. This Anti-Bribery and Corruption Policy (Policy) forms part of the Company's risk management framework, consistent with the Company's values of integrity, accountability and transparency as well as the principles of business conduct expected of the Company's Directors and Executives¹, which are expanded upon in the Company's [Code of Conduct](#).

Who does this Policy apply to?

This Policy applies to the Company's Directors and Executives and all third parties acting for or on behalf of the Company.

What is bribery, corruption and fraud?

Bribery is the offering, promising, giving, accepting or soliciting of an inducement, directly or indirectly, for an action which is illegal, unethical or a breach of trust, in order to gain any commercial, regulatory or personal advantage. Bribes can take the form of money, gifts, loans, fees, donations, rewards or other advantages.

Corruption is the abuse of a position, trust, power or authority for private gain.

Fraud is deceitful or dishonest conduct, involving the intentional misrepresentation or omission of information, in order to gain any commercial, regulatory or personal advantage. Examples of fraud include, but are not limited to: financial theft or misappropriation of cash, securities or organisational resources, forgery, falsification or alteration of financial reports, documents, records and data, improper use of position or insider knowledge and unauthorised or improper expenditure.

Our Policy

Directors, Executives and all third parties acting for or on behalf of Future Generation Australia must:

- comply with anti-bribery and corruption laws in all markets and jurisdictions in which the Company operates, including the *Criminal Code Act 1995* (Cth);
- not give, offer, accept or request bribes, gifts and/or benefits as an inducement for business opportunities or decisions in favour of the Company, either directly or indirectly;
- not give bribes or other improper payments or benefits (including facilitation payments) to public officials even if not contrary to law;
- not engage in any fraudulent conduct;
- not make payment of secret commissions to those acting in an agency or fiduciary capacity for the Company;

- not make political donations on behalf of the Company, unless authorised by the Board;
- only make donations to charitable organisations with Australian Tax Office (ATO) deductible gift recipient status (DGR);
- declare all conflicts of interest, whether actual, potential or perceived, per the Company's [Code of Conduct](#); and
- ensure the Company keeps and maintains accurate and transparent financial records and accounts which will evidence the business reason for making payments to third parties.

Gifts and Entertainment

The Company recognises that it is accepted business practice that entertainment and small gifts may be extended to and from third parties with whom the Company has a relationship. However, any such gifts must be made for a proper purpose.

Directors and Executives of Future Generation Australia should not accept or offer personal gifts or extraordinary hospitality, accommodation or travel which may influence, or appear to influence, a business decision. Any such offers must be reported to the Chair of the Board and the Company Secretary as soon as possible and recorded in the Gift and Entertainment Register.

Directors and Executives of Future Generation Australia are expected to decline gifts and benefits with a value of \$400 or more, with the exception being for work related conferences, (where travel is involved, it is expected that the Company will pay the travel and accommodation expenses). Directors and Executives of Future Generation Australia should also discuss the offer with the Chair of the Board and the Company Secretary before accepting the gift or benefit.

All gifts and benefits valued at \$100 or more, given and received, must be declared and recorded in the Gift and Entertainment Register, whether or not they have been accepted.

Breaches of the Policy

Bribery and corruption may result in serious criminal and/or civil penalties, including fines and imprisonment, as well as significant reputational damage and financial consequences, for both the Company and any individuals involved. A breach of this policy may also result in disciplinary consequences including termination of appointment or employment.

How to raise a concern or breach

All potential or actual breaches of this Policy must be reported immediately by speaking directly and privately to the Chair of the Board of Directors of Future Generation Australia, the Chief Executive Officer of Future Generation Australia, or the Chief Financial Officer of the Wilson Asset Management Group. If you believe all of these people to be compromised, the report should be made to the Chair of the Audit & Risk Committee of Future Generation Australia or the next most senior person that you believe is not compromised.

Reports may also be made in accordance with the Company's [Whistleblower Policy](#).

The Company's Board of Directors will be informed of any material incidents of bribery, corruption or fraud.

Reports of illegal or alleged illegal conduct will be taken seriously. The Company is committed to pursuing investigations promptly and adopting an appropriate and fair response that reflects our zero tolerance for bribery and

¹ An executive officer (whether or not a Director) involved in the strategic and operational management of the Company and includes the Company Secretary.

corruption. Future Generation Australia will take all available steps to provide protection to persons who raise concerns, from any victimisation or detrimental action in reprisal for making a report.

Training

Future Generation Australia's Directors and Executives will receive training at induction and also on a regular and ongoing basis, to ensure they are aware of their rights and obligations under this Policy.

Policy review and improvement

This Policy will be reviewed periodically. This review is to be coordinated by Wilson Asset Management Chief Financial Officer on behalf of the Company. Proposed changes must be approved by the Board of Directors, following endorsement by the Audit & Risk Committee. Any changes to this Policy will not take effect until published on the Company's website.

Adopted: 30 October 2020