

Anti-Bribery and Corruption Policy

LMIS's anti-bribery and corruption policy establishes our approach, principles and requirements to comply with relevant laws and regulations, and to minimise the risk of LMIS becoming associated with such criminal activities.

This Policy applies to all LMIS businesses and subsidiaries, as well as to all employees, officers, contractors, interns, casual workers and agency workers ("LMIS staff").

All LMIS staff must ensure that they do not engage in any activity which breaches bribery and corruption laws or regulations. To facilitate understanding, this is described broadly as:

- Minimising offering, promising, giving or accepting something in exchange for inducing improper conduct on the part of someone else, either directly or indirectly.
- Abusing a position of trust or power, to gain an improper advantage; and
- Offering or accepting any illegal facilitation payments or 'kickbacks'.

LMIS staff must report any concerns of this nature as soon as they become aware of them and may do so via their manager or a member of the compliance team. The Policy also refers staff to the LMIS Whistleblowing Policy and Procedures, which provide alternative means of escalation should staff feel unable to report concerns through the usual channels for any reason.

LMIS is also committed to ensuring that all staff are appropriately trained on this issue. At a minimum, all LMIS staff must complete mandatory training, including anti-bribery and corruption training, when they join LMIS, with further refresher training on the subject completed regularly.

LMIS's anti-bribery and corruption Policy complements, and is supported by, a host of other policies including a Conflict of Interest Policy, Gifts and Entertaining Policy. For example, the Gifts and Entertaining Policy confirms that it is the policy of LMIS not to make political donations, which we consider to include any gift, loan or deposit given to a political party.

The Managing Director of LMIS is responsible for oversight of the anti-bribery and corruption risk approach as part of his broader remit over financial crime and reports to the Board.