



The letters 'IOOF' are rendered in a large, white, sans-serif font, positioned over a scenic coastal landscape. The background shows a blue ocean with white waves, a sandy beach, and green hills under a blue sky with scattered clouds. In the foreground, there are some green plants and trees.

Anti-Bribery and Anti-Corruption Policy

October 2019

Table of contents

Table of contents	2
1. Overview	4
1.1. Introduction	4
1.2. Policy statement	4
1.3. Application	4
1.4. Policy detail	4
1.5. Roles and responsibilities	5
1.5.1 IOOF Board	5
1.5.2 Employees	5
1.5.3 Business unit	5
1.5.4 ERC	5
2. Anti-bribery and anti-corruption requirements	5
2.1 What is bribery?	5
2.2 What is corruption?	6
2.3 Bribery is prohibited	6
2.4 Facilitation payments	6
2.5 Secret commissions	6
2.6 Customers engaged in bribery and corruption	6
2.7 Donations, gifts and sponsorships	7
2.7.1. Donations	7
2.7.2. Personal donations	7
2.7.3. Sponsorship	7
2.7.4. Gifts, entertainment and travel	7
3. Assessment and reporting	7
3.1 Bribery and Corruption Risk Assessment	7
3.2 Reporting bribery and corruption	8
3.2.1. Customer misconduct	8
3.3 Due diligence	8
3.3.1 Employee	8
3.3.2 Third party	9
4. Training and awareness programs	9
5. Policy breaches	9
6. Review, approval and ownership	10

6.1	Review and approval	10
6.2	Interaction with other policies and procedures	10
7.	Document information	11
	Appendix A – Glossary	12

1. Overview

1.1. Introduction

This Anti-Bribery and Anti-Corruption Policy (Policy) outlines the IOOF Holdings Limited's (IOOF's) approach to identifying, managing and mitigating and bribery and corruption risks.

An effective Policy strengthens and protects IOOF's reputation, promotes compliance with relevant laws, and provides accountability and transparency amongst IOOF personnel. This Policy seeks fair customer outcomes, promotes financial market integrity, raises credibility with key stakeholders (including our clients) and supports IOOF's commitment to corporate responsibility.

Terms used in this Policy are defined in the Glossary in Appendix A.

1.2. Policy statement

Honesty, integrity and fairness are integral to the way IOOF operates. Conduct associated with bribery and corruption is inconsistent with those values. This Policy prohibits employees from engaging in any activity that constitutes bribery or corruption and puts in place tools to ensure that bribery and corruption risks within IOOF's businesses are properly identified, mitigated and managed.

1.3. Application

This Policy applies to IOOF Holdings Ltd (IHL) and its controlled entities, which comprises APRA Regulated Entities (AREs), Responsible Entities (REs), Australian Financial Services (AFS) licensees and all Australian and New Zealand business divisions (collectively referred to as 'IOOF' in this Policy).

All IOOF employees; including casual, temporary and contracted employees as well as Executives and Non-Executive Directors and any third parties acting on behalf of IOOF (collectively referred to as 'employees' in this Policy), must comply with this Policy. IOOF employees must not engage in any activity which may be construed or perceived as bribery or corruption, whether for the benefit of IOOF, themselves or another party.

This Policy is part of the broader suite of policies that make-up the IOOF Code of Conduct Policy Framework.

1.4. Policy detail

IOOF employees must not offer, promise, give, request, agree to receive or accept, directly or indirectly, anything of value. This includes gifts, entertainment, sponsored travel, or any other benefit that could improperly influence or be perceived to improperly influence any person, in order to obtain or retain business or any advantage of any kind for IOOF or any other person. Value thresholds for gifts, entertainment and sponsored travel offered to or by IOOF employees are set out in the IOOF Travel Policy and the IOOF Group Employee Expense Policy.

IOOF prohibits offering or providing anything of value to a public official or any member of their family in order to improperly influence, or be perceived to improperly influence, in order to obtain or retain business or secure any improper advantage of any kind for IOOF or any other person.

IOOF will not, either directly or indirectly, make a donation or grant as a way of improperly influencing any person in order to obtain or retain business or an advantage of any kind for the benefit of IOOF or any other person.

IOOF will not enter into or continue a business relationship with a third party without appropriate due diligence being conducted and/or if it cannot be satisfied that the third party will behave in a manner consistent with this Policy.

IOOF will not keep inaccurate books, records and accounts or keep accounts and transactions 'off-book' to facilitate or conceal improper payments and transactions.

IOOF will implement a training and awareness program that is designed and maintained to promote compliance with the Policy and is consistent with legal and regulatory requirements.

Any breaches of this Policy are to be reported to the Board.

1.5. Roles and responsibilities

1.5.1 IOOF Board

The IOOF Board oversees the effectiveness of, and compliance with, this Policy and its compliance with related external obligations.

1.5.2 Employees

All IOOF employees must be aware of their obligations arising from this Policy and abide by their obligations under the IOOF Code of Conduct.

All IOOF employees must immediately escalate any potential, suspected or actual breaches of this Policy to Enterprise Risk and Compliance (ERC).

Each IOOF employee must complete all mandatory training as directed by IOOF.

1.5.3 Business unit

Each business unit should implement and maintain individual processes and procedures to ensure compliance with the Policy and its reporting requirements.

1.5.4 ERC

ERC will provide leadership, guidance, advice and direction to promote compliance with the Policy across IOOF. ERC will also oversee and challenge business decisions on risk assessments, third party due diligence and business unit processes.

2. Anti-bribery and anti-corruption requirements

2.1 What is bribery?

Bribery is the act of offering, promising, giving, accepting or soliciting a benefit to:

- induce the improper performance of a function or activity
- improperly influencing a person in order to obtain or retain business or an advantage.

The benefit may be monetary or non-monetary. For example, the benefit may take the form of gifts, loans, special commissions, offers of employment, or other advantages such as tax exemptions, services, donations or rebates.

Whether the recipient of the bribe works in the public or private sector is irrelevant. Likewise, whether the bribe is accepted or ultimately paid is irrelevant. Merely offering the bribe (whether directly or through any other person) will be considered an act of bribery.

2.2 What is corruption?

Corruption is the abuse or misuse of an entrusted power for private gain, whether it be in the public or private sector. Corruption involves the demanding or accepting of anything of value by such a person, as a condition to conferring business or any other improper advantage whether directly or indirectly.

Corruption can occur on different scales. For example, it could vary from small favours between a small number of people (petty corruption), to corruption that affects the government on a large scale (grand corruption), or to corruption that is so prevalent that it is part of the everyday structure of society, including corruption as one of the symptoms of organised crime. Corruption undermines people's trust in political and economic systems, institutions and leaders.

2.3 Bribery is prohibited

Bribery is illegal and is strictly prohibited under this Policy. This prohibition extends to bribes offered, solicited or accepted:

- to obtain or retain business, influence a business decision or to secure any other advantage for IOOF or any other person
- for the personal benefit of an IOOF employee, or for the benefit of that person's family, friends, associates or acquaintances.

Furthermore, it is a criminal offence to bribe or corrupt a public official and can carry severe penalties. Public officials include all public sector employees, members of government boards and committees, local government elected officials and employees, employees of public universities, employees of public utilities and some volunteers.

2.4 Facilitation payments

Facilitation payments are considered bribes and are strictly prohibited. Facilitation payments are (typically small) payments paid to secure or expedite routine action by a person, usually a public official or employee.

2.5 Secret commissions

Secret commissions are also considered bribes and are prohibited. Secret commissions typically arise where a person or entity (such as an employee of IOOF) offers or gives a commission to an agent or representative of another person (such as a customer's agent) which is not disclosed by that agent or representative to their principal (the customer). Such a payment is made as an inducement to influence the conduct of the principal's business.

2.6 Customers engaged in bribery and corruption

There is a risk that IOOF may be misused by its customers who may be conducting their own acts of bribery or corruption. For example:

- a customer directing or collecting funds through IOOF, for the purpose of paying a bribe
- a customer receiving a bribe and depositing it into an IOOF account
- laundering the proceeds of a bribe payment through an IOOF account.

If there are suspicions that a customer is conducting an act of bribery or corruption, it should be immediately escalated to the Financial Crime team within the ERC for further investigation. The ERC will determine if the suspicion requires reporting to the Australian Transaction Reports and Analysis Centre (AUSTRAC) by way of a suspicious matter report (SMR). It is important not to notify the customer of your suspicions, as this is considered to be 'tipping off' and is illegal under the Anti-Money Laundering and Terrorism Financing Act (AML/CTF Act) 2006.

2.7 Donations, gifts and sponsorships

2.7.1. Donations

Donations made directly or indirectly to charities, sports clubs, local community groups or other causes must not be used to disguise a bribe. Transfers of anything of value to induce the improper performance of a function or activity, and/or influencing any person in order to obtain or retain business of any kind is prohibited.

IOOF employees must consider whether a proposed donation could be perceived as an inducement for the purpose of obtaining or retaining an advantage for the benefit of IOOF or any other person. If yes, then IOOF employees must not make the donation. If IOOF employees are in doubt, advice must be sought from ERC.

2.7.2. Personal donations

Donations paid by IOOF employees in their personal capacity are at the discretion of the individual and are not subject to this Policy.

2.7.3. Sponsorship

Donations must not be given under the guise of sponsorship. Sponsorship is usually in the form of money, that is given (usually by an organisation) to support a person, organisation, charity or activity. Sponsorship can be in the form of marketing in which IOOF pays for all or some of the costs associated with an event, project or program, in exchange for recognition.

2.7.4. Gifts, entertainment and travel

Gifts must not be given as a form of bribery. Things given voluntarily without compensation may include, but are not limited to: goods, services, rebates and loans and prizes won by IOOF employees at an event hosted by a third party. This does not include gifts given by IOOF employees to one another or to IOOF employees through approved sales incentives programs.

Refer to the IOOF Group Conflicts Management Policy for further details.

3. Assessment and reporting

3.1 Bribery and Corruption Risk Assessment

The nature and extent of bribery and corruption risks that are likely to be encountered by IOOF will vary according to a number of factors, some of which may be unique to a particular/business unit due to the nature of its business or the location of its operations. IOOF has a zero-risk appetite towards bribery and corruption.

Business units must conduct a Bribery and Corruption Risk Assessment (Risk Assessment) to determine the particular bribery and corruption risks they may face to ensure that any additional systems and controls

designed to mitigate identified risks are included. The Risk Assessment must be documented appropriately and retained in accordance with the IOOF Records Classification and Retention Policy.

A Risk Assessment should be conducted at least every two years or may be repeated at more frequent intervals if ERC determines that changes in its bribery and corruption risk warrant it (for example, if a control is found to be operating ineffectively).

3.2 Reporting bribery and corruption

Bribery and corruption instances must be reported whether suspected or actual. Employees have an obligation to report suspected or actual instances of bribery or corruption (whether by another employee or any other person) to ERC or through the mechanisms outlined in the IOOF Group Whistleblower Policy.

3.2.1. Customer misconduct

In the event that an employee becomes aware that an IOOF customer has been accused of, or the subject of, a bribery or corruption allegation, an Unusual Activity Report (UAR) needs to be submitted immediately to the Financial Crime team via the +IOOF-AML-PEP-sanctions.check@ioof.com.au mailbox.

An employee must report to the ERC if:

- any employee is subject to extortion
- is under threat of violence or personal harm to themselves, their family members or other staff
- they receive requests for illegal payments or to provide other unethical advantages
- is solicited in any way for a bribe of any kind.

Employees should treat the suspicion of bribery and corruption in the same manner as the suspicion of any other criminal activity. Where appropriate, they must report their suspicions via the existing suspicious matter reporting process documented in IOOF's Anti-Money Laundering/Counter Terrorism Financing (AML/CTF) Program – Part B and the IOOF Group Fraud Policy.

Any records relating to bribery and corruption should be kept in accordance with IOOF's Record Classification and Retention Policy.

3.3 Due diligence

3.3.1 Employee

IOOF must identify and manage any bribery and corruption risks in relation to all prospective and existing employees by undertaking appropriate due diligence screening.

IOOF must undertake due diligence screening on all employees:

- prior to the commencement of their role with IOOF
- prior to an employee moves to a 'Red Rated' role.

Screening must be in accordance with the Employee Due Diligence Program within Part A of the AML/CTF Program.

IOOF roles are classified as either red or green based on the extent to which the roles are exposed to high risk factors such as exposure to ML/TF activities, potential for fraud, corruption and bribery, access to sensitive information and the ability to alter key internal systems.

Roles which are determined to be high risk are referred to as 'Red Rated' and are subject to enhanced employee due diligence procedures. Refer to Schedule 1 within Part A of the IOOF's AML/CTF Program for a checklist with questions to assist in determining the rating of a role.

3.3.2 Third party

IOOF must undertake due diligence on third party business relationships. A third party is an entity (whether a natural person, an organisation or any other entity) with whom IOOF employees engage commercially or contractually with during the course of their employment, or commercial or contractual business relationships associated with IOOF, including actual and potential, suppliers, service providers, distributors, business contacts, advisers, government and public bodies.

Business partners such as members of joint ventures, mergers and acquisitions in which IOOF actively participates and does not hold a purely passive investment are also considered third parties under this Policy.

Refer to IOOF Third Party Payments Policy, IOOF Vendor Management and Outsourcing Policy and IOOF Vendor Management and Outsourcing Procedures for further guidance.

4. Training and awareness programs

In addition to the Code of Conduct training, role-specific training regarding bribery and corruption should be implemented. There are certain roles and functions which, due to potential risks relating to the employee's functions, will require additional role-specific training tailored to the specific needs which incorporates and reflects the particular bribery and corruption vulnerabilities.

ERC is responsible for the development and ongoing maintenance of applicable online anti-bribery and anti-corruption role-specific training content within the Mandatory Learning Governance Framework, via the electronic training platform.

ERC will develop and deliver role-specific training to a pre-determined target audience. Business units within IOOF are responsible for determining and confirming the proposed target audience accurately, encompassing relevant individuals or categories of employees who require a level of role-specific training on bribery and corruption and advising ERC of any changes.

The content and appropriateness of the training program must be regularly reviewed by the ERC. Records of training (including records of content and completion) are to be captured and retained in accordance with the IOOF Record Classification and Retention Policy.

5. Policy breaches

Failure to comply with this Policy may lead to criminal, civil or regulatory liability for IOOF or its personnel, along with serious reputational damage. A breach of this Policy is a breach of IOOF's Code of Conduct and may lead to disciplinary action, including dismissal or termination of contract.

Any incidents and potential or actual breaches in relation to this Policy must be managed in accordance with the Risk Management Framework. Policy breaches will be dealt with in accordance with the Group Incidents and Breaches Policy and must be reported immediately to your Line Manager, Human Resources Representative, Group Integrity team or the ERC.

All employees are encouraged to report their concerns as early as possible without fear of recrimination or risk of reprisal. Employees will not be penalised for diminished productivity or delayed performance directly attributable to their refusal to engage in activities prohibited by this Policy.

Suspected policy breaches may also be reported via the mechanisms set out in the IOOF Group Whistleblower Policy.

Any breaches of this Policy are to be reported to the Board.

6. Review, approval and ownership

6.1 Review and approval

This Policy (and any material changes) must be approved by the IOOF Board. Non-material changes must be approved by the Chief Risk Officer (CRO).

The AML/CTF Senior Manager, Financial Crime, or a suitable delegate, is required to review this Policy annually and any material amendments must be provided to the CRO for review and recommendation to the Board.

6.2 Interaction with other policies and procedures

This Policy is to be read and applied in conjunction with the following IOOF Policies:

- IOOF AML/CTF Programs Part A & B (Doc ID: 1000137 and 1000139)
- IOOF Code of Conduct (Doc ID: 1000231)
- IOOF Due Diligence Policy (Doc ID: 1000058)
- IOOF Group Conflicts Management Policy (Doc ID: 1000621)
- IOOF Group Employee Expense Policy (Doc ID: 1000660)
- IOOF Group Fraud Policy (Doc ID: 1000141)
- IOOF Group Whistleblower Policy (Doc ID: 1000143)
- IOOF Incidents and Breaches Policy (Doc ID: 1000595)
- IOOF Records Classification and Retention Policy (ref: 1000644)
- IOOF Third Party Payments Policy (Doc ID: 1000652)
- IOOF Travel Policy (Doc ID: 1000692)
- IOOF Vendor Management and Outsourcing Policy (Doc ID: 1000145)

7. Document information

Title	Anti-Bribery and Anti-Corruption Policy (Version 1.0)
Owner	Enterprise Risk and Compliance
Approved by	Chief Risk Officer
Hierarchy level	Level 1 – Board Policies
Effective date	30 October 2019
Last reviewed	N/A
Next review	October 2020

Appendix A – Glossary

Term	Definition
Anything of value	Means any advantage, and includes, but is not limited to: money, loans, tangible or intangible property, fees, stocks, contractual rights or interest, real estate, personal property, or other interests arising from business relationships, gifts, meals, entertainment, contributions, donations, grants, travel and travel related expenses, below-market discounts, refunds, rebates, preferential treatment in the provision of, or preferential access to business opportunities, offers of employment or work experience, goods or services that do not have a commercially reasonable justification, or other improper inducements.
Benefit	Includes any advantage and is not limited to property. A benefit may take the form of gifts, loans, fees, rewards or other advantages such as taxes, services, donations, grants or rebates.
Bribe or bribery	The offering, promising, giving, accepting, soliciting or transfer of a benefit or anything of value, either directly or indirectly, to (1) induce the improper performance of a function or activity; and/or (2) improperly influencing a person in order to obtain or retain business or an advantage.
Bribery and Corruption Risk Assessment	An assessment of the bribery and corruption risks associated with a Division/Business Unit/Country's particular business circumstances and culture, as required under the Anti-Bribery and Anti-Corruption Requirements.
Business unit	A business unit of IOOF, irrespective of the location(s) in which that part of IOOF operates.
Cash	Includes cash equivalents such as gift cards, gift cheques, preloaded cards and cheques.
Central bank	The entity responsible for overseeing the monetary system of a nation (or group of nations).
Conflict of Interest	An actual, potential or perceived conflict of interest arises where the specific duties or interests of a person or entity in respect of an outcome, are not aligned with that person or entity's obligations or duties to others to achieve a different outcome.
Controlled entities	An entity that is a controlled entity for the purpose of IOOF's consolidated group of financial reporting (Identified as controlled in the Group Entity List – generally covers entities for which IOOF has power over more than 50% of the voting rights or power to govern the financial and operating policies)
Corruption	The abuse of entrusted power for private gain. Corruption involves the demanding or accepting of anything of value by such a person, as a condition to conferring business or any other improper advantage whether directly or indirectly.
Donation	Means giving of monetary or non-monetary items (for e.g. use of cars or equipment etc.) typically for charitable purposes and/or to benefit a cause. Donations made by IOOF must align with IOOF Corporate Responsibility Expenditure process.
Due diligence	Refers to the research, investigation, assessment and monitoring that IOOF will carry out on a business relationship to assess its risk of bribery and corruption.

Term	Definition
Employee	<p>For the purposes of this Policy an Employee includes:</p> <ul style="list-style-type: none"> ● Permanent employees: employed directly through the IOOF Group as a regular maximum term, casual, temporary, non-executive director, international assignee or intern. ● Contractors: employed through a preferred recruitment agency. ● Service providers: employed by a Third Party vendor and have access to the Group's IT network and systems.
Entertainment	<p>Any form of hospitality that is given or received where the provider of the hospitality ("Host") is present. Tickets to events where the Host is not present are Gifts, not Entertainment. Entertainment may include, but is not limited to, meals, receptions, tickets to artistic, social or sporting events (including IOOF – sponsored events paid for by a Third Party). Entertainment does not include internal IOOF hospitality, such as a working lunch or dinner attended solely by IOOF personnel.</p>
Facilitation payments	<p>Also called 'facilitating', 'speed' or 'grease' payments. These are usually small cash payments paid to secure or expedite routine action by a person, usually a public official or employee.</p>
Forms of bribery	<p>Bribes can take many forms, including but not limited to: kickbacks, facilitation payments, secret commissions, cash payments, donations, grants, sponsorships, promotions, offers of employment and/or work experience, gifts, entertainment, sponsored travel, discounts, fee waivers, cash equivalents (vouchers etc.) contractual rights or interest, equity, travel, preferential treatment in the provision of access to business opportunities, grants, loans, real estate, using connections or position as a bribe, improper travel per diems, and commissions.</p>
Gifts	<p>Things given voluntarily without compensation, including but not limited to goods, services, rebates and loans, and also including prizes won by IOOF Employees and Contingent Workers at an event hosted by a third party; does not include gifts given by IOOF Employees and Contingent Workers through approved sales incentive programs.</p>
Grant	<p>A grant is an amount of money or a specific financial contribution that a government or other institution gives to an individual or to an organisation for a particular purpose.</p>
Group integrity	<p>The IOOF team, responsible for conducting investigations into allegations of bribery and corruption, or non-compliance with this Policy.</p>
HQ	<p>The IOOF intranet portal which contains company information for access by all IOOF Employees.</p>
Improper performance	<p>Performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust.</p>
Kickback	<p>Is a form of bribery in which an illicit commission intended as compensation is paid in exchange for favourable treatment or other improper services rendered. A kickback can take many forms and may be money, a gift, credit, or anything of value. Kickbacks usually feature collusion between two parties. Paying or receiving kickbacks is a corrupt practice and is considered a bribe under this Policy.</p>

Term	Definition
Operational Risk Executive Committee (OREC)	The primary senior executive management forum responsible for oversight of Operational Risk and Compliance Risk, expected and unexpected risk profile, and the related Control Environment.
Politically Exposed Person (PEP)	Business Units should refer to the AML/CTF & Sanctions glossary for further information.
Public entities	Means governments, government departments, statutory bodies and/or public sector authorities (including at a local or regional level); State Owned Enterprises (SOE's) or any other enterprise, organisation, association or body under the direction or control of government; and public international organisations and any enterprise, organisation, association or body under the direction or control of such public international organisations.
Public official	<p>Means:</p> <ul style="list-style-type: none"> ● Any officer or employee of, or other person acting in an official capacity for a government, whether national, federal or local, including under a law, custom or convention; ● Any legislative, administrative or judicial official, whether appointed or elected, including officials exercising a public function on behalf of any entity controlled or owned by a government, including but not limited to central banks, sovereign wealth funds, state-run hospitals, any public international organisation and any business venture that is owned or controlled by a government entity; ● Any candidate for political office; ● Any official of a political party; ● Any member of a royal family; ● Any person who is or purports to be an authorised intermediary of any of the above; ● Where known, the relevant person's close family members (e.g. spouse, children, parents, and siblings) and close associates (e.g. key business colleagues, personal advisers and legal entities owned or controlled by that person); ● Politically Exposed Person (PEP). Refer to the AML/CTF Requirements for the definition of a PEP; and ● Includes foreign public officials.
Secret commissions	Secret commissions typically arise where a person or entity (such as an employee of IOOF) offers or gives a commission to an agent or representative of another person (such as a customer's agent) who is not disclosed by that agent or representative to their principal (the client). Such a payment is made as an inducement to influence the agent/representative to conduct of the principal's business.
Sponsored travel	<p>Travel undertaken by IOOF Employees where the costs are covered by a third party or travel undertaken by a third party where the costs are covered by IOOF. This may include (but is not limited to) the costs of attendance at conferences or site visits, and the associated flights, accommodation, meals, etc.</p> <p>Sponsored Travel does not include:</p> <ul style="list-style-type: none"> ● travel paid for by the way of disbursement (i.e., initially paid for by IOOF and then later reimbursed, or vice versa), or

Term	Definition
	<ul style="list-style-type: none"> travel connected to the performance of an existing written agreement between IOOF and the third party, under which one party has agreed to cover the travel expenses incurred by the other (although note that any such travel arrangements are still subject to the general prohibition on bribery under the ABAC Policy and Requirements, and must comply with the IOOF Travel Policy).
Sponsorship	A form of marketing in which IOOF pays for all or some of the costs associated with an event, project or program, in exchange for recognition.
SUAR	Suspicious/Unusual Activity Report. IOOF Employees and Contingent Workers must report all suspicious transactions (including proposed transactions). Please refer to Report a suspicious or unusual matter on Max.
Subsidiaries	<p>An entity identified as a subsidiary in the Group Entity List, which uses the Australian Corporations Act definition.</p> <p>(Generally, an entity for which IOOF appoints more than half the directors or IOOF holds more than 40% of the shares.</p> <p>Usually subsidiaries are controlled entities, however there are instances of non-controlled subsidiaries).</p>
Third party / third parties	<p>Any person (whether a natural person, an organisation or any other entity) with whom IOOF Employees and Contingent Workers engage commercially or contractually with during the course of their employment, or commercial or contractual business relationships associated with IOOF, including actual and potential, suppliers, service providers, vendors, joint venture partners, agents, intermediaries, consultants, distributors, business contacts, advisers, government and public bodies. Business partners such as members of joint ventures, mergers and acquisitions in which IOOF actively participates and does not hold a purely passive investment are also considered Third Parties under this policy.</p> <p>Examples include, but are not limited to suppliers, consultants, agents, finders, introducers, lobbyists, lawyers, professional services firms, sales and marketing firms.</p>