



## FRAUD PREVENTION AND ANTI-BRIBERY POLICY

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### 1. Background

- 1.1. Coronation Fund Managers (“Coronation”; “Coronation Group”) is committed to conducting itself and its activities in accordance with the highest legal, ethical and moral standards. Accordingly, we take a zero-tolerance approach to bribery and corruption. We are committed to the elimination of any fraud or bribery within the organization, and to the rigorous investigation of any such instances. Furthermore, we commit to ensuring that the risk of fraud being perpetrated on client accounts is mitigated by implementing robust processes and controls. Coronation will uphold all laws relevant to countering bribery and corruption in all jurisdictions in which it operates.

“**Fraud**” comprises both the use of deception and intentional misrepresentations to obtain an unjust or illegal financial advantage.

“**Bribery**” is an inducement or reward offered, promised, given, accepted or solicited in order to gain any commercial, contractual, regulatory or personal advantage, which is illegal or a breach of trust. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

- 1.2. Coronation has implemented and maintains procedures designed to prevent employees and those associated with it from committing fraud or bribery using Coronation’s systems or processes.
- 1.3. The Board and Executive Committee requires anyone having a reasonable suspicion of fraud or bribery to report such suspicion immediately to the Chief Executive Officer, Head of Global Risk & Compliance or anonymously by using the “Whistleblowing Hotline” - see the Whistleblowing Policy available on the Coronation Compliance & Risk Home Page. Fraud and fraud attempts relating to a client must be reported to the Compliance Department immediately, but not later than 48 hours after the person has become aware of the fraud or fraud attempt should it take that long to establish the facts. This report should be submitted by clicking on the “Fraudulent Transaction Reporting” box on the Compliance & Risk Home Page and completing the required fields. Employees are assured that they will not be negatively impacted in any way as a result of reporting a reasonably held suspicion of fraud or bribery, whomever it may implicate. For these purposes “reasonably held suspicion” shall mean any suspicion other than a suspicion which is shown to be raised with malicious intent and found to be groundless.

### 2. Scope

- 2.1. This Policy applies to all staff, including part-time and fixed term contract employees, and the directors of the Coronation Group of companies, as well as consultants, suppliers, contractors, and/or any other parties who engage with Coronation. This Policy applies to all Coronation Group’s business dealings and transactions in all countries in which any subsidiaries and associates operate.
- 2.2. This Policy is concerned not only with the prevention of internal fraud and bribery, but also external fraud and bribery that may be perpetrated on or in relation to client accounts, or at all.
- 2.3. Any investigative activity required will be conducted objectively and fairly, without regard to any person’s relationship to Coronation, position, or length of service.



#### 2.4. This Policy must be read together with the

Code of Ethics, Gifts & Inducements Policy, Whistleblowing Policy and Anti-Money Laundering and Financial Crime Policy.

### 3. Staff Obligations

All staff have a duty to be aware of the fraud and bribery opportunities that might occur in their areas of responsibility and to be alert to any fraud and bribery triggers or indicators. All forms of fraud and bribery are strictly prohibited and against the law. If anyone is unsure about whether a particular act constitutes fraud or bribery, then escalation to the Compliance Department is required immediately.

Examples of what is not permissible (not an exhaustive list):

- a) give, promise to give or offer a payment, gift or hospitality with the expectation that a business advantage will be received in return, or to reward any business received;
- b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for such third party or anyone else;
- c) give or offer any payment (sometimes called a facilitation payment), gift or hospitality to a government official, agent or representative in any country to facilitate or speed up a routine or necessary procedure;
- d) threaten or retaliate against a co-worker who has refused to commit a bribery offence or who has raised concerns under this Policy; or
- e) engage in any activity that might lead to a breach of this Policy.

### 4. Gifts and Hospitality

This Policy does not prohibit the giving or accepting of immaterial, reasonable and appropriate gifts or hospitality to or from third parties. Coronation has however adopted certain controls and limitations in relation to the giving and receiving of such gifts or hospitality to ensure that it is proportionate and reasonable in the circumstances and does not risk constituting an offence, or a conflict of interest. Please see Coronation's Gifts and Inducements Policy.

### 5. Donations

Coronation does not make contributions to political parties. Charitable donations are only made that are legal and ethical under local laws and practices. The charitable donations process, including approvals, is managed by the Marketing Department, CSI Committee and the CEO.

### 6. Facilitation payments and kickbacks

Coronation does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by Coronation.



## 7. External Fraud

Operational processes and controls are designed to identify and prevent fraudulent activity. Periodic assurance is obtained to ensure consistent application of the agreed controls in high-risk areas and to identify any areas of weakness. Coronation keeps abreast of emerging fraud trends through participation in industry forums.

## 8. Compliance and Sanction

Non-compliance with this Policy may result in disciplinary action or, depending on the circumstances, dismissal and an obligation on Coronation to report the matter to the appropriate authorities

## 9. Policy Approval

Date	Action
May 2023	Reviewed by Head of Global Compliance & Risk
Aug 2024	Approved by CFM Board