

Anti-Bribery and Corruption Policy

Document purpose and scope

The Anti-Bribery and Corruption Policy (commonly referred to as the ABC Policy) forms a key part of our Group's anti-corruption framework. This Policy sets out the minimum requirements for managing the risk of bribery and corruption linked to the actions of employees, third parties, and in dealings with customers. The document is aligned with current legal requirements and reaffirms that neither the Bank nor the Group have tolerance for any breaches relating to bribery or corruption. All employees undergo regular training sessions (covering ethics and the Code of Conduct) with a strong focus on anti-corruption. Staff who fail to adhere to the standards laid out in the Policy may face disciplinary actions.

Which ESG-related issues does the Policy address?

The Policy outlines the principles for conducting business in a way that reduces the risk of bribery and corruption. This includes areas such as:

- capital transactions and strategic decision-making,
- cooperation with suppliers and intermediaries,
- recruitment and remuneration of staff,
- sponsorships and donations.

It also sets out standards for controls designed to prevent corruption. These include:

- training of employees and contractors,
- gifts and hospitalities received or offered by employees,
- due diligence of suppliers,
- control of outgoing payments,
- accounting records and registers (e.g. gift register),
- reporting irregularities through whistleblowing channels.

When it comes to suppliers, the Policy requires analysis both at the start of the relationship and ongoing monitoring throughout.

- Before partnering with any supplier, a due diligence risk assessment is carried out, including checks on individuals connected to the suppliers, such as beneficial owners. The Policy also provides anti-corruption clauses, which are included in contracts with counterparties.
- There is an internal monitoring system designed to ensure regular updates to counterparty risk assessments and the review of any alerts generated by these partners.

The Policy and associated training are intended to raise awareness among employees that any financial or personal gain, including payments to public officials related to their duties (even so-called facilitation payments), may be considered a form of corruption and is strictly prohibited.

Procedures related to the Policy establish a bank-wide system for the periodic, annual assessment of corruption risk across several areas (such as risks related to gifts and hospitality, suppliers, sponsorship, etc.). The document also outlines warning signs (so-called

red flags) that should trigger escalation for a more thorough analysis of a given situation. Potential breaches can be reported via whistleblowing channels or email inboxes devoted to corruption-related risks.

[The highest management level responsible for the Policy](#)

The Policy defines the roles of the three lines of defence set up based on the Bank's risk management framework. The document also describes the roles of the AML Operating Committee and the AML Decision Making Committee. The Head of the Anti-Money Laundering and Counter Terrorist Financing Department is responsible for the application and supervision of the Policy.

[Application across the Bank's subsidiaries](#)

The Policy applies across the Group.