

## **ANTI-BRIBERY AND CORRUPTION POLICY**

The Bank is committed to continuously apply the principles of honesty, integrity, and transparency in doing its business and conducting its transactions with internal and external stakeholders. As part of its ethical business practice, bribery and corruption are not tolerated by the Bank.

### **Scope**

All Bank employees, as well as to the directors, consultants and other third parties acting for or on behalf of the Bank shall be covered by; and strictly comply with, this Policy.

### **Roles and Responsibilities**

The Board and Senior Management are responsible for building, promoting, and maintaining a culture of ethical behavior within the organization where bribery and corruption are neither allowed nor tolerated.

The Head of the Personnel Department is the Anti-Bribery and Corruption Officer (ABC Officer), appointed by the Board to oversee the bank-wide adherence with the Bank's ABC policies and procedures, as well as with relevant laws and regulations. In the absence of the ABC Officer, the Personnel Management, Employee Benefits and Ethics Committee shall perform the functions of the ABC Officer.

The Risk Management Department shall periodically conduct risk assessment to identify the risk areas in terms of potential exposure to bribery and corruption; assess the efficacy of the existing controls; recommend appropriate controls and systems to ensure prevention and mitigation of bribery and corruption risk; review the risk assessment done by units initiating to establish business relations or enter into contract with third parties; and inclusion of the result of risk assessment in the report of the Chief Risk Officer to the Board of the appropriate Board-level committee.

The Compliance Department shall perform compliance testing on the transactions covered by this policy and activities under the ABC Program.

The Auditing Department shall include in their audit universe the efficacy of the implementation of the ABC Program; compliance under with third-party due diligence procedures; approval process, purpose, and legitimacy of the Bank's expenditures.

## **ABC Program**

The ABC Program shall include the planned activities to effectively manage the bribery and corruption risk within the organization. The activities shall, among other things, ensure compliance with this Policy and related internal policies and procedures, as well as the performance of functions by the relevant units involved in the detection, prevention, and management of bribery and corruption.

## **Reporting**

The Bank encourages the reporting of any possible incident of bribery and corruption. No adverse action shall be taken against employees who, in good faith, shall report actual or perceived violation of this Policy and the relevant internal policies and procedures.

## **Training**

Training on the ABC laws, regulations, internal policies and procedures, as well as the typologies of bribery and corruption in the banking industry shall be mandatory to all employees and directors. Bank consultants and agents shall be invited to attend training. Training shall be tailored fit to the intended audience to help them better understand their roles in the Bank's fight against bribery and corruption, and identify the situations where they may be at risk for such acts.

## **Sanction**

Anyone who violates this Policy shall be subject to disciplinary action such as, but not limited to, reprimand, suspension, dismissal, termination of contract/business relationship/service, or removal from directorship, as the case may be, after an investigation duly conducted thereon and compliance with other legal procedures. The imposition of disciplinary action shall be without prejudice to the appropriate criminal and civil actions that may be filed against the erring director, employee, or agent.