



ANTI CORRUPTION POLICY



BANQUE
INTERNATIONALE
À LUXEMBOURG

ANTI-CORRUPTION POLICY

1. SCOPE

This policy is relevant to all BIL Group employees worldwide and business partners (service providers, clients, etc.). In those situations where the Bank does not have full management control, we will exercise our available leverage to influence compliance with this Policy. BIL will always comply with applicable local laws that are in force. In situations where there is a conflict with international norms, we shall seek to uphold our company values - defined in our Code of Ethics - and develop a response on a case-by-case basis.

2. DEFINITIONS

The Bank is committed to fight against Corruption in the form of Bribery, which is commonly described as involving the offer, promise, request, acceptance or transfer of anything of value either directly or indirectly to or by an individual, in order to improperly induce, influence, or reward the performance of a function or an activity.

- **Bribery:** It is the offering, suggesting, giving, accepting or authorizing of a payment or advantage (monetary or non-monetary) to someone for its, or another's personal gain with the intention to induce an active or passive action which is illegal, unethical or a breach of trust. Bribery occurs during an interaction between at least two parties. Usually, both the giving and the receiving parties of the Bribe are deemed to have committed a crime (depending on the local regulation and laws).
- **Bribe:** A Bribe is defined as an offer, promise, donation, gift or advantage given or received, directly or indirectly, for and by the person offering or receiving the Bribe or for and by a third party.
- **Corruption:** Corruption is the abuse of entrusted power for private gain. The main forms of corruption are bribery, embezzlement, fraud and extortion.
- **Facilitation or "grease" payments:** It can be any payment or benefit of any value (typically small unofficial payments paid to speed up an administrative process or secure a routine government action by an official), and include goods, services and information, and may not be monetary in nature, given or offered to a public official. For legal purposes, it is distinguished from bribery, however the distinction is often unclear. Determining whether a payment is a facilitating one may be difficult and depend on the circumstances. The value of the payment is not immediately relevant, however the greater the value, the higher are chances that it will be qualified as a bribe.

3. COMMITMENTS

3.1. Zero tolerance as key principle

BIL Group is committed to carrying out business fairly, honestly and openly. In order to achieve this, BIL Group:

- adopts a zero tolerance approach to Bribery and Corruption and maintains an Anti-Bribery and Corruption culture;
- requires compliance with all Anti-Bribery and Corruption laws in the countries in which it conducts business (whether through a third party or otherwise);
- recognizes that over and above the commission of any crime, any involvement in Bribery or Corruption will also reflect adversely on its image and reputation;
- will investigate and report any suspicion of Bribery or Corruption and where necessary provide appropriate assistance to relevant authorities;
- upholds the highest levels of integrity (check out our Ethics Policy on <https://www.bil.com/sustainability/politiques.html>);
- avoids any Bribery and Corruption act, as these may incur criminal penalties for both BIL Group and individuals involved.

All forms of Bribery and Corruption are prohibited. It is unacceptable for BIL Group or any Staff members, third parties acting on its behalf or any of its clients to be involved or implicated in any way in corrupt practices. BIL Group will not tolerate any act of Bribery or Corruption. Any breach of this Policy or local law(s) could result in disciplinary action being taken and ultimately could result in dismissal.

A Bribe does not actually have to be given or taken - just promising to give a Bribe or agreeing to receive one is also prohibited. Bribery and Corruption is prohibited when dealing with any person whether they are in the public or private sector and the provisions of this Policy are of general application.

All BIL Group Staff members are prohibited from:

- Offering or suggesting a Bribe, or authorizing the offer or suggestion of a Bribe;
- Paying Bribes;
- Soliciting or accepting a Bribe to influence a decision, to give unauthorized access to confidential information, or to commit or omit to do an act, whether or not the outcome would have been the same without the Bribe;
- Making Facilitation Payments;
- Using another party to conduct any of the above;
- Using vendors or suppliers that do not have high standards on Bribery and Corruption;
- Processing funds known to be, or reasonably suspected of being, the proceeds of Bribery or Corruption.

Moreover, within BIL Group it is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- retaliate against or threaten a person who has refused to commit a Bribery offence;
- retaliate against or threaten a person who has raised concerns under this Policy;
- engage in activity in breach of this Policy;
- Facilitation Payments are not tolerated and are illegal.

3.2. Gifts, favors and invitations

It is mandatory to declare all gifts, favors and invitation as per thresholds defined in the internal BIL Group "Gifts, favors and invitations" Policy. BIL Group has clearly articulated a policy governing the provision and receipt of gifts, favors and business hospitality. The policy is addressing gifts, favors and invitations on the basis of the relevant risk factors and includes the monetary thresholds for approval. The "Gifts, favors and invitations" Policy provides for escalating levels of approvals as the risk from the provision/receipt of gifts and hospitality increases.

3.3. Money Laundering

The Bank is committed to:

- Combating financial crime through the development and application of a framework of procedures and controls aimed at preventing financial crime;

Combat threats to the integrity of the national and international financial system through the application of economic and financial sanctions designed to disrupt, dissuade and deter threatening activities and actors;

- Protect the BIL Group, and more generally the entire financial system, from criminal abuse by identifying vulnerabilities and remedying them, through enhanced transparency and accountability measures.
- Assess risk related to financial crime hinging on country risk; sector / activity risk; customer risk.
- Apply two levels of controls and / or prevention of financial crime: Prohibition on establishing or continuing business relationships in connection with or with certain countries, sectors and customer profiles; Restriction and / or enhanced due diligence measures for establishing or pursuing business relationships related to certain countries, sectors and customer profiles.

3.4. Charitable donations & sponsorship

BIL Group does not allow charitable donations, sponsorships and direct or indirect contributions to political parties or organizations as it may be used as a subterfuge for Bribery.

3.5 Conflicts of interests

To avoid any risk of influence or conflict of interest, all employees must maintain complete independence in their relationships with clients, business partners (suppliers, subcontractors, etc.) and all other BIL Group Entities.

For more information on Conflict of Interests, please refer to our Ethics Policy available on <https://www.bil.com/sustainability/politiques.html>.

4. IMPLEMENTATION

The Bank is committed to:

- Embed the Bribery and Corruption policy throughout the Group through internal communication.
- Raise awareness among new joiners together with the other Compliance topics.
- Provide all employees with comprehensive compliance training on the risks associated with all financial crime, including Bribery and Corruption.
- Implement disciplinary and criminal sanctions in case of failure to comply with this Policy.

5. GOVERNANCE

Every employee is responsible for respecting the Policy in regards to any potential act(s) of Bribery and Corruption so that they may be appropriately managed, reported and resolved.

The **Senior Management** is responsible for putting a framework in place and implementing systems, controls and procedures to prevent, identify, escalate and manage the act(s) of Bribery and Corruption.

The **Management Body** is responsible for establishing, approving and overseeing the implementation and maintenance of effective charters and policies to identify, assess, manage and mitigate or prevent actual and potential act(s) of Bribery and Corruption.

6. REPORTING

The Bank maintains internal whistle-blower arrangements which enable the entire Staff to draw attention to serious and legitimate concerns about internal governance and it could be used for the act of Bribery and Corruption. To be noted that, these arrangements respect the confidentiality of the persons who raise such concerns and provide for the possibility to raise these concerns outside the established reporting lines as well as with the Management Body. The warnings given in good faith shall not result in any liability of any sort for the persons who issued them. Find out more on our Whistleblowing Policy at: <https://www.bil.com/sustainability/politiques.html>.

Marie Bourlond, Chief Compliance Officer

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