

Anti-Bribery and Corruption Policy

SHORTENED VERSION - AUGUST 2025

POLICY INFORMATION

Legal entity scope	ABN AMRO Bank N.V. and all its subsidiaries, branches, and representative offices inside and outside the Netherlands (together referred to as 'ABN AMRO' or 'the Bank'). Where local requirements are stricter (due to regulatory requirements of the local market) or additional local requirements are in place, these requirements additionally apply.
Geographic scope	All locations

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DISCLAIMER

- This text is a shortened version of the ABC (Anti-Bribery & Corruption) Policy and is highlighting its main topics. No rights can be derived from this shortened version. The full version of the ABC Policy is published on the internal ABN AMRO Bank's website.

READING GUIDE

- Defined terms are marked **green and bold**. Definitions and abbreviations can be found in the Policy Glossary.

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PART A: PURPOSE OF THE ANTI-BRIBERY AND CORRUPTION POLICY

1 Introduction

1.1 What is the purpose of this policy?

The Anti-Bribery and Corruption Policy (hereafter, “this policy”) defines the minimum requirements in place at **ABN AMRO** (hereafter, “the Bank”) to prevent and deter bribery and corruption risks. This policy is to ensure that the clients, employees and third parties involved with the bank refrain from any form of bribery and corruption. The purpose of this policy is to protect the Bank from any direct or indirect involvement in bribery and corruption.

Bribery and corruption undermine citizens' trust in the government and hinder economic growth. For instance, they impair investments that are crucial for the economic development of a country, such as health, water, education and infrastructure. Bribery and corruption also undermine fair and competitive business, at national and international levels.

Bribery and corruption are illegal acts in the countries where the Bank operates. Any involvement in bribery and corruption by ABN AMRO, its employees, its clients or third parties involved with the Bank, could create significant financial, legal and reputational risks for the Bank, personal liability for involved employees, for Senior Management and for its Executive Board.

2 Background

2.1 What is bribery?

Bribery is a form of corruption. Bribery can occur in two ways, as active bribery and passive bribery and can also involve the offender or close relatives, friends or a chosen proxy:

- Active bribery occurs when someone intentionally provides, promises, or offers money, a service or another unfair advantage, either directly or through an intermediary, to a public official or a person working for a private company. The aim is to influence this person to act or refrain from acting in a way that breaches their duties or is illegal.
- Passive bribery occurs when a public official or someone working for a private company requests or receives an advantage (i.e. gifts, service, promise), either directly or through an intermediary. This can involve any kind of undue benefit or the promise of such a benefit. The purpose is to influence the official or employee to act or refrain from acting in a way that violates their duties or the law.

A bribe can be given in many forms, such as cash, **gifts**, services, an employment, a contract or anything else that is valuable to the recipient. Figure 1 below illustrates bribery.

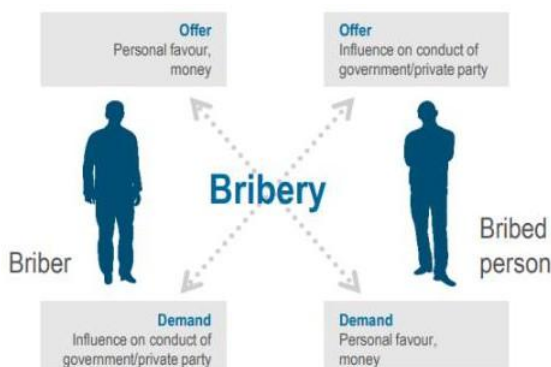


Figure 1: The act of bribery, Extracted from: *The Knowledge document on Corruption*

Examples of bribery include, but are not limited to, the following examples:

- **Kick-backs:** an illegal payment, gift, offer or continuation of business by the briber. Intended as compensation for preferential treatment or any other type of improper service received (e.g. a company that receives a government contract might send the responsible official regular payoffs for the duration of the contract). The kickback may be money, a gift, credit, or anything of value.
- Secret commissions offered in exchange for a favor.
- **Influence peddling:** The briber uses their influence/power in government or in a corporation to obtain favors or preferential treatment from another, usually in return for payment.
- **Facilitation payments:** The act of small unofficial payments being paid to speed up an administrative process or secure a routine government action by an official (as opposed to legitimate and receipted fast-track payments).

2.2 What is corruption?

Corruption is defined as the misuse or abuse of entrusted power and influence for personal gain or the gain of one or more person(s) or organization(s). Corruption can take many different forms.

Entrusted power can be the result of holding a public or political office, of holding an influential role in a corporation, of having personal wealth or access to significant resources, or having elevated social standing.

Corruption can lead to personal gain or gains in personal relationships (i.e. family, friends, business relations) but can also involves gains for a collective entity such as a political party, a company or another type of organisation. Gain can mean financial gain but also includes other non-financial gains, including in particular the preservation or increase of a person(s) or organisation's position of power and influence. The gain targeted with corruption can be for the present, near future, but also for the long-term -especially when corruption is aimed at the access or preservation of power and influence. The more corruption risk indicators are present, the higher the possibility of corruption risk.

Examples of corruption include, but are not limited to, those listed below:

- *Misappropriation:* The unauthorized use or appropriation of another's **property** for purposes other than they were intended.
- *Influence peddling* (also called trading in influence): The promise, offer or giving -directly or through an intermediary- of an undue advantage of any kind to a person in order for that person to exert real or supposed influence with a view to obtaining an undue advantage from **a public official** or from a person who directs or works, in any capacity, in the private sector.
- *Abuse of functions:* Actions where a public official or person who in any capacity directs or works for a private sector exceeds or misuses their legitimate authority to achieve benefits or cause harm, in breach of their duties².
- *Obstruction of justice:* The use, directly or through an intermediary, of physical force, threats or intimidation or the promise, offering or giving of an advantage to induce false testimony, to interfere in the giving of testimony, the production of evidence, or the exercise of official duties by any person holding a judicial office or a member of law enforcement in a proceeding or other actions concerning any of the offences that qualify as corruption.
- *Embezzlement of public or private funds:* The act of dishonestly withholding or taking funds or property entrusted to one's care, but owned by someone else, for personal use or gain.
- *Illicit enrichment:* Refers to a significant increase in the assets of an individual that cannot be reasonably explained in relation to their lawful income.

² A definition of "breach of duty" is provided in Appendix (glossary).

2.3 How could the Bank be involved in bribery and corruption?³

The Bank runs the risk of being involved in bribery and corruption through the involvement of:

- One or more of its **employees**. This involvement can be both intentional or unintentional; employees can be either the initiators or the recipients of bribery and corruption;
- **Third parties** involved with the bank, being suppliers as well as third parties that perform activities on behalf of the Bank. The third party can be intentionally or unintentionally initiating or being a recipient of bribery and corruption;
- **Clients** where the Bank can be (mis-)used by clients to disguise funds gained or used for bribery and corruption.

³ Under local requirements, extra-territorial requirements state that that the bribery does not need to take place on UK soil and non-UK companies are within the scope if they have a business in the UK or if any part of a bribery arrangement takes place within the UK.

PART B: POLICY REQUIREMENTS

3 General prohibitions

1. The Bank, employees (explicitly including members of the Management Body and Senior Management) and third parties involved with the bank are prohibited from:
 - a. Engaging, attempting to engage, or giving the appearance of engaging, in any behaviour or action that could qualify as bribery and corruption according to the definitions provided in paragraphs 2.1 and 2.2; and
 - b. Bypassing or attempting to bypass any of the requirements set in this policy or any measure in place at the Bank to prevent and combat bribery and corruption.

The requirements below bring detail to the general prohibition:

2. The Bank, employees (in their role at the Bank) and third parties involved with the bank are prohibited from engaging, attempting to engage, or giving the appearance of engaging in the following behaviors or actions:
 - a. When dealing with public officials: Any form of influence peddling.
 - b. Political donations: Offering, or providing political donations, financial contributions, or gifts (or anything else of value) to a candidate for a public office, an elected official, a political party or a political action committee in association with the Bank.
 - c. Recruitment and hiring: Offering work or employment at the Bank in exchange for a favor to another party.
 - d. Charitable contributions, sponsorship payments and gifts⁴: Making charitable contributions, sponsorship payments or gifts⁵ with the intent to influence clients, third parties or public officials and/or entice them to act in breach of their duties. In addition,
 - i. When funds are donated in ABN AMRO's name for charitable purposes, appropriate due diligence must be conducted.
 - ii. Any charitable donation must always be made directly to a validated charitable organization and not via another party or individual.
 - e. Hospitality and Entertainment: Covering any travel expenses, entertainment fees or providing the costs of lavish hospitality.
 - f. Facilitation payments: Paying small unofficial payments to speed up an administrative process or secure a routine government action by an official (as opposed to legitimate and receipted fast-track payments) is strictly forbidden; facilitation payments are considered as bribes.
 - g. Other fee payments: Where an agent or intermediary is used to make introductions to officials of public or government-bodies and agencies (other than facilitation payments), procurement (or relevant contract owner of the agent or intermediary) ensures that any fee paid by ABN AMRO is proportionate to the activity being performed, transparent and in accordance with local law.

⁵ Any form of legal tender/money, such as cash money or electronic payments is also consider a prohibited gift.

4 Identification and assessment of Bribery and Corruption risks

4.1 Identification and assessment bank-wide

The identification and assessment of bribery and corruption risks throughout the Bank is conducted as part of the Systematic Integrity Risk Analysis (SIRA).

4.2 Identification and assessment at client level

1. The following risk indicators must be integrated in the assessment and monitoring of bribery and corruption risks at client level:
 - a. Adverse media on bribery and corruption, including allegations or suggestions thereof.
 - b. Corruption red flags in relation to products, and product features such as transaction behaviour.
 - c. Association with a PEP: A PEP presents a higher bribery and corruption and reputational risk as this person may abuse the prominent public function for personal gain.
 - d. Clients dealing with intermediaries: In many cases subject to anti-bribery or corruption enforcement, corruption occurs via the use of intermediaries such as brokers, agents and consultants.
 - e. Presence or activities in a country with elevated bribery and corruption risks: Although corruption can occur in all jurisdictions worldwide, certain jurisdictions have elevated corruption levels.
 - f. Activities in high corruption risk sectors: Certain sectors have an inherent high risk of corruption due to government authorisations or licenses needed for performing their activities or have been subject to many international criminal investigations into corruption.

4.3 Identification and assessment at Third Party level

A third party can be involved in bribery and corruption. This can result in bribery and corruption risk and possibly liability for ABN AMRO.

1. ABN AMRO has several processes in place to assess third party bribery & corruption risks for new and existing business relationships. If deemed necessary, the prospect will be rejected or the relationship with the third party will be terminated.
2. The Bank will require each third party to comply with the Bank's Anti-Bribery and Corruption Policy.
3. The following risk indicators must be integrated in the assessment and monitoring of bribery and corruption risks at third party level:
 - a. Adverse media on bribery and corruption, including allegations or suggestions thereof;
 - b. Corruption red flags in relation to third parties for example third parties with no public track record or reputation and third parties who clients ask the bank to engage with where the reason for their involvement is not commercially clear;
 - c. Association with a PEP: A PEP presents a higher bribery and corruption and reputational risk as this person may abuse the prominent public function for personal gain;
 - d. Third parties dealing with intermediaries: In many cases subject to anti-bribery or corruption enforcement, corruption occurs via the use of intermediaries such as brokers, agents and consultants;
 - e. Presence or activities in a country with elevated bribery and corruption risks: Although corruption can occur in all jurisdictions worldwide, certain jurisdictions have elevated corruption levels.
 - f. Activities in high corruption risk sectors: Certain sectors have an inherent high risk of corruption due to government authorisations or licenses needed for performing their activities or have been subject to many international criminal investigations into corruption.
 - g. **Cartel formation:** Third parties can form a cartel among themselves, for example when determining prices;
 - h. Bribery of employees: Any event reported by employees that indicates that the third party has attempted to bribe or other influence employees that results in **breach of duty**.

4.4 Identification and assessment at organisational and employee level.

The assessment and monitoring of bribery and corruption risks at employee level is integrated in the screening processes of the employee life cycle. Different screening processes are in place, proportionate to the risk level of the function.

5 Managing the bribery and corruption risk

1. Where bribery and corruption risks are deemed as falling outside the Bank risk appetite, then an appropriate risk response (avoid, mitigate, transfer or accept) must be selected.
2. In addition to the risk responses previously mentioned and the general prohibitions outlined in paragraph 3, infringements of this policy may result in sanctions. Sanctions include disciplinary actions by ABN AMRO, which can lead to dismissal, and sanctions may also involve criminal or regulatory proceedings against the employees involved and/or the Bank.

6 Reporting

6.1 External reporting

1. Bribery and corruption are predicate offences of money laundering. Therefore, ABN AMRO must duly report any suspicions to the relevant authorities in line with external regulatory requirements.
2. In relation to employee and third party bribery and corruption, the Bank must duly report any suspicions to the relevant authorities in line with external regulatory requirements.

7 Learning & Awareness

Minimum mandatory learnings about this policy apply across the Bank (including entities).

Additional training is organised for those employee groups that are most likely to be confronted with bribery and corruption risk in their daily activities at the Bank, for example, to be working with PEP. Local entities may initiate additional training initiatives locally.

PART C: Glossary of terms and abbreviations

Terms and Abbreviations	Definition
ABN AMRO (the Bank)	ABN AMRO Bank N.V. and all its subsidiaries, branches, representative offices and legal entities that are under its control
Adverse media	Adverse media is unfavourable information pertaining to a client or a relevant related party of the client, which can be found in different media sources and which can lead to a serious threat, reputational damage or financial loss to the Bank. Definition from the <i>Client Acceptance and Anti Money Laundering Policy (102-20-20)</i>
Agent	An agent can be defined as any third-party individual or organisation (the “agent”) who has been legally authorized to represent a company and enter into legal agreements on its behalf.
Breach of duty	covers as a minimum any disloyal behaviour constituting a breach of a statutory duty, or, as the case may be, a breach of professional regulations or instructions, which apply within the business of a person who in any capacity directs or works for a private sector entity.
Bribery	Bribery is a form of corruption: it includes giving or receiving something of value to gain an unfair advantage, or to persuade someone to act improperly. A bribe can be given in many forms, such as cash, gifts, an employment or internship contract or anything else that is valuable to the recipient.
Cartel formation	An agreement or concerted practice between undertakings aimed at or resulted in reducing competition between them. For instance, via sharing information that is ‘commercially sensitive’.
Client	A party with whom a business relationship is or is being established, to whom a service is provided, or for whom a transaction will be carried out. A client may be a natural person, legal entity or legal arrangement.
Corruption	Misuse or abuse of entrusted power and influence for personal gain or the gain of one or more person(s) or organization(s).
Employee	A private individual working for and under the supervision of the Bank. An employee can be either an internal employee or an external employee.
Facilitation payments	The act of small unofficial payments being paid to speed up an administrative process or secure a routine government action by an official (as opposed to legitimate and receipted fast-track payments).
Gifts	A tangible or intangible present, including entertainment and is applicable for giving and receiving.
Influence peddling	The promise, offer or giving -directly or through an intermediary- of an undue advantage of any kind to a person in order for that person to exert real or supposed influence with a view to obtaining an undue advantage from a public official or from a person who directs or works, in any capacity, in the private sector.
Kick-backs	When the bribe payer, usually the supplier of goods or services to the principal, overcharges the principal, paying some or all of the overcharge to the principal’s representative in return for awarding a contract to that supplier or continuing to place business with it.
Management Body	Executive Board and Supervisory Board of ABN AMRO Bank N.V.
PEP	Politically Exposed Person means a natural person who is s or who has been entrusted with prominent public function and includes the following (non-exhaustive list): • Heads of State, heads of government, ministers and deputy or assistant ministers;

	• Members of parliament or similar legislative bodies; • Members of the governing bodies of political parties; • Members of supreme courts, of constitutional courts or of other high-level judicial bodies, the decisions which are not subject to further appeal, except in exceptional circumstances; • Members of courts of auditors or of the boards of central banks; • Ambassadors, chargés d'affaires and high-ranking officers in the armed forces; • Members of the administrative, management or supervisory bodies of State owned enterprises; • Directors, deputy directors and members of the board or equivalent function of an international organisation. International organisations are entities established by formal political agreements between their member States that have the status of international treaties. Their existence is recognised by law in their member countries and they are not treated as resident institutional units of the countries in which they are located, e.g. UN, IMF, World Bank, EU, or NATO. Middle-ranking or more junior officials are excluded from the PEP definition
Property	Funds or assets of any kind, whether consisting of material object or not, movable or immovable, tangible or intangible, and legal documents or instruments in any form, including electronic or digital, evidencing title to, or an interest in, such assets.
Public Official	Any person holding an executive, administrative, or judicial office at national, regional or local level, whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person's seniority.
Senior Management	Management layer one level below the ExBo in the hierarchical structure of the Bank, i.e. reporting directly to a member of the Management Body
SIRA	Systematic Integrity Risk Analysis
Third parties	A legal entity that is not an ABN AMRO client with a business relationship.