

## **UNION BANK'S COMMITMENT TO ANTI-BRIBERY/ANTI-CORRUPTION**

### **1. Commitment to Anti-Bribery/Anti-Corruption**

Union Bank (referred to as the 'Bank') is committed to conduct its business activities with integrity, honesty, and fairness. An important part of honouring that commitment is making sure that everyone at the Bank upholds the Bank's standards of ethical business conduct.

Thus, the Bank takes a zero-tolerance approach to any form of bribery and corruption. Conduct of this type is prohibited whether committed by employees or anyone else acting on behalf of the Bank.

### **2. Anti-Corruption Policy**

The Bank has formalized its commitment to anti-corruption compliance by establishing an Anti-Corruption Policy, which is approved by the Board of Directors. This policy articulates the approach to corruption and sets out the Bank's expectations with respect to anti-bribery, prohibiting employees, directors, agents, consultants, and other similar intermediaries who act on the Bank's behalf from making, receiving, or giving bribes, gifts, gratifications, or rewards as an inducement to persuade a person to act in a particular manner to achieve a particular result. These prohibitions apply to dealings with individuals and corporate entities, public officials, and any other person with whom the Bank anticipates doing business with.

A breach of the Anti-Corruption Policy by an employee will be treated as grounds for disciplinary action.

The Bank's commitment to compliance with anti-corruption laws extends to the activities of its agents and business partners as well. Accordingly, the Bank has a policy of conducting anti-corruption-related due diligences on its agents and business partners in order to identify any potential risks associated with them.

### **3. Implementation of Anti-Corruption Policies**

The Bank has implemented an anti-corruption compliance program that includes training, due diligence of third parties and mandatory reporting, and ensure that all Bank employees undergo the training program. The Bank maintains books and records that accurately reflect its transactions, the use of its assets, and other similar information, and a reasonable system of internal controls.

The Bank has also implemented rules for acceptance and offer of gifts and hospitality, in order to ensure compliance with the Anti-Corruption Policy. Accordingly, employees are prohibited from

accepting gifts, services, loans, or favoured preferential treatment from anyone, including customers and suppliers, in exchange for or with regard to a current or future business relationship or transaction with the Bank except when such a gift is part of a customary exchange of seasonal gifts/ complimentary gifts not exceeding a value prescribed in the Anti-Corruption Policy. Acceptance of any such gift is required to be reported to the Compliance Officer. The Policy permits the giving of a token gift (which is not cash or cash equivalent) to third parties subject to a pre-approval mechanism.

The Bank's Anti-Corruption Policy also prohibits the making of, offering or facilitating any payments to win, influence, gain or retain business or an improper business advantage and the making of political donations (including sponsorships), for any such purpose.

#### **4. Responsibility**

The accomplishment of the Bank's commitment to anti-corruption relies on the diligence of all its personnel. Formal responsibility for overseeing the implementation of the Anti-Corruption Policy is assigned to the Head of Compliance, who provides training and guidance on the policy to the employees.

#### **5. Reporting channels**

Everyone within the organisation has a duty to report suspected acts of bribery or corrupt practices. The Bank believes that it is essential to create an environment in which everyone feels that they can raise any matters of genuine concern without fear of disciplinary action being taken against them or fear of reprisal. Thus, the Bank ensures that all cases of suspected bribery are dealt with consistently and whether or not an investigation shows bribery exists, there will be no retaliation against or adverse consequences for the person reporting the possible case of bribery.

The Bank has several channels that employees can go through in order to raise any concerns in confidence, including violations of the Anti-Corruption Policy and these include,

- multiple contact lines provided in the Whistle Blowing Policy; and
- Compliance Officer

All reports are taken seriously and treated with the utmost confidentiality and anonymity. The Bank has processes in place to ensure reports are promptly investigated and addressed and outcome is conveyed to the person/s who raised the concern, thereby ensuring a two-way communication process.

The Bank will not take any reprisal or retaliation measures, including any adverse employment measures, against any director, officer, employee and/or third party who in good faith brings forward actual or potential violations or concerns.