

# Anti-Bribery and Corruption Policy

## POLICY INFORMATION

Policy number	102-25-26
Policy version	5.0
Framework topic	Our Risk Profile - Non-Financial Risk
Policy owner	Compliance Mirjam Bakker - Vergouw
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Risk type scope	Compliance Risk is the primary risk type addressed in this policy. The secondary risk type addressed in the policy is the Fraud risk. The policy contributes to addressing several material risks listed in the Risk Taxonomy, including the Client bribery and Corruption risk, Organisational and Employee bribery and corruption risk en Third party bribery and corruption risk.
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
Policy implementation timelines	The implementation deadline of the policy is 6 months following the publication date. Exceptions apply for: <ul style="list-style-type: none"><li>• The assessment and monitoring of bribery and corruption risks at third party level as detailed in par. 4.3: The identification and assessment at Third Party level, at least within 12 months of the publication date of this policy.</li><li>• Requirement of minimum mandatory learnings as detailed in par. 7: Learning &amp; Awareness, at least within 12 months of the publication date of this policy.</li></ul>

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## READING GUIDE

- Defined terms are marked **green and bolded**. Definitions and abbreviations can be found in the online [Policy Glossary](#).
- Policy requirements are numbered.
- Documents that are referred to in this policy can be found on the [Policy Framework](#).

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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 level.

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.

#### 1.2 What is the relation to other documents?

This policy is governed by the [Risk Governance Charter](#) (101-20-00) and has been created/maintained in line with the [Policy on the Policy Framework](#) (101-23-40). This policy supports the [Enterprise Risk Management Policy \(101-21-06\)](#) and the [Non-financial Risk Policy \(101-23-01\)](#) in describing the bank's risk management framework.

Documents that are referred to in this policy can be found on the [Policy Framework \(alphabetical catalogue\)](#).

### 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.

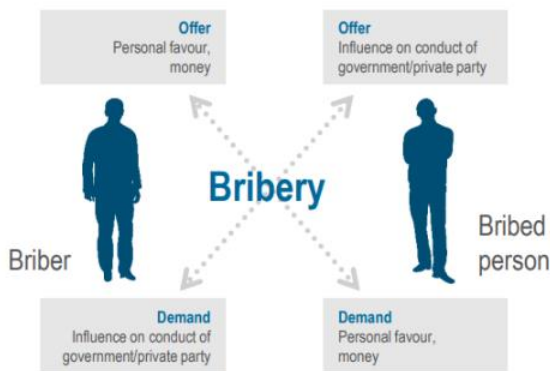


Figure 1: The act of bribery, Extracted from: *The Knowledge document on Corruption*<sup>1</sup>

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.

<sup>1</sup> Image can be found in the [Knowledge Document on Corruption](#)

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- *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 duties<sup>2</sup>.
  - *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.

### 2.3 How could the Bank be involved in bribery and corruption?<sup>3</sup>

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. For more information on employees please refer to the Human Resources Risk Policy (108-30-10);
- **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. For more information on Third parties and outsourcing, please refer to the [Third Party & Outsourcing Policy \(108-70-20\)](#) .;
- **Clients** where the Bank can be (mis-)used by clients to disguise funds gained or used for bribery and corruption. For more information on clients, please refer to the *Client Acceptance and Anti-Money Laundering Policy (102-20-20)*.

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<sup>2</sup> A definition of “breach of duty” is provided in Appendix IV (glossary).

<sup>3</sup> 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.

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## 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
  - a. 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 behaviours 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 of work or employment at the Bank in exchange for a favour to another party. Measures defined in the *Human Resources Risk Policy (108-30-10)* and the *Procurement Standard (S07-930)* help ensure the integrity of the recruitment process;
  - d. Charitable contributions, sponsorship payments and gifts<sup>4</sup>: Making charitable contributions, sponsorship payments or gifts<sup>5</sup> with the intent to influence clients, third parties or public officials and/or entice them to act in breach of their duties. For more information on the requirements on providing/accepting gifts, please refer to the *Conflicts of Interest Policy (102-25-21)*. In addition,
    - i. When funds are donated in ABN AMRO's name for charitable purposes, appropriate due diligence must be conducted to determine whether a public official or public body is associated with the charity. If this is the case, written agreement must be obtained from line management.
    - ii. Any charitable donation must always be made directly to a validated charitable organization and not via another party or individual. In case of doubt, refer to line management who may obtain advice from local Compliance, and if necessary, from the local Legal department.
  - e. Hospitality and Entertainment: Covering any travel expenses, entertainment fees or providing the costs of lavish hospitality. Please refer to the *Conflicts of Interest Policy (102-25-21)* for more detail.
  - 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 as described in paragraph 4.2.e), 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. No such fee payments can be made without the express

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<sup>4</sup> For further information on gifts, please refer to the *Conflicts of Interest Policy (102-25-21)*.

<sup>5</sup> Any form of legal tender/money, such as cash money or electronic payments is also consider a prohibited gift. Please refer to the *Conflicts of Interest Policy* for detailed requirements.

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approval of business line management who may obtain advice from (local) Compliance or, if necessary, (local) Legal (as may be appropriate).

## 4 Identification and assessment of Bribery and Corruption risks

### 4.1 Identification and assessment bank-wide

The identification and assessment of client bribery and corruption risks throughout the Bank is conducted as part of the client integrity Systematic Integrity Risk Analysis (SIRA). As for bribery and corruption risks related to employees and third parties, their identification and assessment are conducted via non-client integrity SIRA. In short, as part of the SIRA, the RTO of bribery and corruption establishes annually, a list of bribery and corruption risk events -events that could materialise throughout the Bank- based on internal and external sources. Internal assessment units assess the likelihood and impact of the different bribery and corruption events. See the *SIRA Standard (S07-306)* for more information on the SIRA process.

Based on the SIRA outcomes, mitigating measures are put in place to adequately and timely identify, assess and respond to possible bribery and corruption risks.

### 4.2 Identification and assessment at client level

The assessment and monitoring of bribery and corruption risks at client level is integrated in the client due diligence (CDD) and monitoring processes defined in the *Client Acceptance and Anti-Money Laundering Policy (102-20-20)*. Client owners are responsible for the accuracy of the CDD for all the clients under their remit. Detecting Financial Crime serves as the operational department to support and/or execute many of the client life-cycle processes on behalf of client units with a focus on bribery and corruption (amongst others).<sup>6</sup>

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. Refer to Knowledge document on Corruption for corruption red flags in transactions.
  - c. Association with a PEP<sup>7</sup>: 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 the vast majority of cases subject to anti-bribery or corruption enforcement, corruption occurs via the use of intermediaries such as brokers, agents and consultants. Refer to Risk Assessment – Corruption Risks Clients dealing with Intermediaries for more information and red flags.
  - 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. See the [Country Financial Crime Risk Rating](#) for more information.
  - 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. A list of such sectors can be found in the Knowledge document on 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.

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<sup>6</sup> See *Global Standards Client Due Diligence for Natural Persons*, *Global Standards Client Due Diligence for Business Clients*, and *Global Standards Ongoing Due Diligence*

<sup>7</sup> Please refer to the *Client Acceptance & Anti Money Laundering Policy (102-20-20)* and the *Global Standards Client Due Diligence* for an overview of the functions



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The assessment and monitoring of bribery and corruption risks at third party level is integrated in the due diligence and monitoring processes of third parties defined in the Third Party and Outsourcing Risk Policy (108-70-20).

1. Before entering into a business relationship with a third party, ABN AMRO must carry out the following:
  - a. A risk assessment and appropriate due diligence to minimize the risk of being associated with acts of bribery or corruption.
  - b. Evaluate the third parties bribery and corruption policies and prevention procedures and controls.
2. The Bank will require each third party to comply with the Bank's Anti-Bribery and Corruption Policy.
  - a. Once the contract with the third party is in place, the third party will be monitored periodically, proportionate to the level of risk, the risk mitigation measures, and the materiality of the relationship.
  - b. Unacceptable bribery and corruption risks are reasons to terminate the relationship with a third party or to reject a prospect. The 1LoD is responsible to comply with this policy and for adequately managing the risk of a third party exposing the Bank to acts of bribery or corruption. If Procurement is not involved, the Business must appoint an owner of a (contract with the) business partner to ensure that the agreement and the onboarding of the third party (such as performing a risk assessment, due diligence and periodic review) is in line with this 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 the vast majority of 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. See the Country Financial Crime Risk Rating for more information;
  - 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. A list of such sectors can be found in the Knowledge document on 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 would indicate 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 as defined in the *Human Resources Risk Policy (108-30-10)*. In particular, the processes for pre-employment screening (PES) and integrity sensitive screening in case of Integrity Sensitive Positions (ISP), but also as part of the suitability screening. Further details on the latter can be found in the *Suitability Policy (101-45-01)* and corresponding standards.



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## 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 as depicted in the *Enterprise Risk Management Policy (101-21-06)* by:
  - a. The client unit, entity or function for bribery and corruption risks identified in the SIRA;
  - b. The relevant client owner for clients bribery and corruption risks;
  - c. Procurement or contract owners for third parties bribery and corruption risks<sup>8</sup>; and
  - d. The **line manager**<sup>9</sup> for employee bribery and corruption risks.
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 Internal reporting

1. Where employees are a subject of, aware of, or suspect, an incident or breach in relation to this policy, or any attempt to engage in bribery or corruption, they must report this immediately in accordance with the *Reporting and Prevention of Security Incidents and Compliance Breaches Policy (108-75-08)*.

Employees are encouraged to first discuss actual or suspected violation of this policy with their manager. For client-related suspicion of bribery and corruption, employees can consult Compliance. In other cases, they can consult SIM. If this is undesirable due to employees feeling discomfort in reporting such violations to their line manager, Compliance or SIM in their own name, employees can make use of the banks' confidential whistleblowing channels defined in the *Whistleblowing Policy (102-25-25)*.

The general internal reporting requirements applying to all RTOs are defined in the *Enterprise Risk Management Policy (101-21-06)*.

### 6.2 External reporting

1. Bribery and corruption are considered to be predicate offences of money laundering. Therefore, ABN AMRO must duly report any suspicions to the relevant authorities in line with external regulatory requirements. Please refer to the *Client Acceptance & Anti Money Laundering Policy (102-20-20)*.
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

The main requirements that apply to the development of mandatory and non-mandatory learnings are defined in the *Human Resource Risk Policy (108-30-10)*. The requirements below add only details to these main requirements.

1. The RTO of the bribery and corruption risk is responsible for defining the **minimum mandatory learnings** about this policy in collaboration with HR Learning & Development. These minimum mandatory requirements apply across the Bank (including entities) and ensure that employees are made aware of at least the following:
  - a. The nature of the bribery and corruption risks and of the circumstances when such risks are likely to materialise;

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<sup>8</sup> This must be carried out by the relevant contract owner.

<sup>9</sup> Following procedures and consulting the necessary departments in line with the *HR Risk Policy (108-30-10)*.

- b. Their responsibility to identify and report any suspicion of bribery and corruption in line with paragraph 7.1.1.
  - c. Their responsibility to act in accordance with this policy and the sanctions attached with failing to do so;
  - d. Their responsibility to remain up to date on bribery and corruption topics and risks by completing the mandatory anti-bribery and corruption training; and
  - e. The possibility to make use of the *Whistleblowing Policy (102-25-25)* when faced with issues linked to bribery and corruption that they want to report in a confidential manner and that they do not feel comfortable reporting to their line manager, next level management, to their Compliance Officer or to SIM in their own name.
2. Senior Management (or its delegate) of client units, functions and entities is responsible for:
- a. Determining main target groups and jobs that should be trained about this policy;
  - b. Ensuring that sufficient learning and awareness opportunities are offered to, and made use of, by the target group to meet the learning requirements.
  - c. Bribery and corruption risks and of the circumstances when such risks are likely to materialise;
  - d. Ensuring that additional training is organised for those employee groups that are most likely to be confronted with bribery and corruption risks in their daily activities at the Bank, for example, to be working with PEP.

Local entities may initiate additional training initiatives locally.

## 8 Governance

### 8.1 Committee governance

This table only summarizes the mandates of terms of reference of committees described in the *Risk Governance Charter (101-21-00)*. Any details in this policy must continue to be in line with the Risk Governance Charter. Committee decisions and escalation take place in alignment with the *Risk Governance Charter*.

	Par.	Approval 2 GRC members	RTE Compliance/Compliance Methodology & Oversight
Risk-type framework	All	<b>Approves</b> (by approving this policy)	Pre-approves (by pre-approving this policy)

### 8.2 Key roles & responsibilities

This section describes the governance requirements in place to adequately manage the **bribery** and **corruption** risks at the Bank. These governance requirements are added to those established in the *Enterprise Risk Management Policy (101-21-06)* and the *Risk Governance Charter (101-21-00)*.

- a. The Management Body is accountable for ensuring that documentation, processes and other measures are in place to detect and prevent bribery and corruption related to its employees, its third parties and its clients.
- b. Both the Management Body and Senior Management:
- c. Display their commitment to internal initiatives aimed at preventing and combatting any direct or indirect involvement of the Bank in bribery and corruption (“tone at the top”); and
- d. Foster a culture in which bribery and corruption are not tolerated as part of the Bank’s commitment to “do the right thing” and in line with the ABN AMRO Code of Conduct.
- e. Senior Management is accountable and responsible for ensuring that this policy is duly implemented in the client units, entities and functions under their remit.

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- f. The Risk Type Owner (RTO) of the bribery and corruption risk is the Chief Compliance Officer. As such, this RTO is the owner of this policy and must manage the bribery and corruption risk in line with the requirements set in the Enterprise Risk Management Policy (101-21-06).
  - g. The RTO responsibilities for the bribery and corruption risks related to Organisational and Employee integrity are delegated to SIM, see appendix II for details.
  - h. The RTO responsibilities for bribery and corruption risks related to Third party integrity are delegated to I&ORM, (as the owner of the third party and outsourcing risk). see appendix II for details.
  - i. Deviations from this policy must be approved and recorded in terms of the requirements set out in the Policy on the Policy Framework (101-23-40).
  - j. Exceptions to this policy must be approved by the Chief Compliance Officer or its delegate.

Next to this general governance, more detailed responsibilities are described in the other sections of this policy.

## 9 Deviation management

1. Deviations from this policy must be approved and recorded in terms of the requirements set out in the Policy on the Policy Framework (101-23-40).
2. Any **exception** to this policy requires the formal approval of the Chief Compliance Officer or its delegate.

## PART C: APPENDICES

### I – Policy adherence

Please refer to the Policy on the Policy Framework (101-23-40) for all details on policy adherence management. Information about policy adherence can be found in the [PAI Guide](#) (as found on [Policy Framework - supporting materials and tools](#)).

The policy adherence indicators and associated controls listed in the table below are used to evaluate the adherence to this policy.

Paragraphs	Scope	Subject	Indicator	Explanation of indicator	Evidence
Section 3 - requirement 2a	Employees/departments of the Bank that are directly or indirectly using or approving services of public officials on behalf of the Bank	Verification and validation of using services of a public official	Evidence that a 4 or 6-eyes verification and validation has been performed by the manager of employees/departments of the Bank that are directly or indirectly using or approving services of public officials on behalf of the Bank	To mitigate the risk of exerting improper influence on or obtaining an improper benefit or unfair advantage from a public official, it is important to verify and validate the use of services of a public official, including PEP, or even appearance of that.	RC_FD-2 4 or 6-eyes authorisation to verify and validate the use of services of a public official
Section 3 - requirement 2b and 2d	Employees/departments that are directly or indirectly involved in providing or validating charitable donations or sponsorships	Approval and validation of a contribution via donations, charity or sponsoring	Evidence that there has been a 4 or 6-eyes approval to validate a contribution via donations, charity and sponsoring, on behalf of ABN AMRO Bank to an external party	To mitigate the bribery and corruption risks via donations, charity and sponsoring and in order mitigate the risk of improper advantage with clients or public officials.	RC_FD-2 4 or 6-eyes approval to validate a contribution via donations, charity and sponsoring, on behalf of ABN AMRO Bank to an external party
Section 3 - requirement 2e and 2f	Employees/departments of the Bank that are validating and verifying the fees and services of a third party	Verification and validation of fees and services of a third party	Evidence that there has been a 4 or 6-eyes authorisation to verify and validate the fees and services of a third party which makes introductions to officials, or public or governmental bodies, and agencies	To mitigate the bribery and corruption risks related to fees paid by the Bank to third parties which make introductions to officials, or public or governmental bodies, and agencies. With this control the Bank ensures that any fee paid is proportionate to the activity being performed, transparent and in accordance with local law.	RC_FD-2 4 or 6-eyes authorisation to verify and validate the fees and services of a third party which makes introductions to officials, or public or governmental bodies, and agencies
Section 4.2	Employees involved in client due diligence processes	Due diligence on clients with respect to bribery and corruption risk	Evidence that (enhanced) due diligence has been performed on clients to minimise risk of being associated with acts	To mitigate the risk that the Bank is associated with bribery and corruption risks stemming from clients, a risk analysis	Risk assessment form and underlying documentation  RC_CO-15.01 ABC Due diligence on clients

			of bribery or corruption. For policy adherence regarding client integrity, the adherence statements of the CAAML Policy must be followed.	has been performed completely and correctly with respect to the assessment of client in relation to identified bribery and corruption risks, taking into account the applicable risk indicators.	For policy adherence regarding client integrity, the adherence statements of the CAAML Policy are leading and must be followed.
Section 4.3	Contract Owners/Procurement	Due diligence on third parties with respect to risk of bribery and corruption	Evidence that (enhanced) due diligence on third parties to minimise risk of being associated with acts of bribery and corruption. Contract Owners/Procurement communicates this policy requirements to third parties and requires adherence to this policy	To mitigate the risk that the Bank is associated with acts of bribery and corruption through a third party (that acts on behalf of the Bank or provides services for the Bank. As the Bank bears the ultimate responsibility for its activities, the actions of third parties can result in increased bribery and corruption risk and possibly liability for the Bank	RC_FD-2 Acceptance and screening of a third party that acts on behalf of the Bank or provides services for the Bank  RC_FD-2 Periodic and event driven review of a third party that acts on behalf of the Bank or provides services for the Bank  RC_CO-15.02 ABC Due diligence on 3rd parties
Section 4.4	HR	Employee screening on integrity	HR performs a Pre-employment screening	To mitigate the bribery and corruption risks in relation to employees, all (new) employees must be screened, based on the future access and security rights, according to Human Resource Risk Policy requirements.	Pre-employment screening check EC_HR-01a_1 Pre-Employment screening RC_HR-01a-c Screening of staff
Section 7	All staff	Training and adherence to ABC policy	Evidence that all staff is being trained on bribery and corruption risks according to this policy requirements.	To mitigate the bribery and corruption risks, all staff members should be made aware of the ABC policy and adhere to the policy requirements. Business ensures that staff members for whom the ABC training is mandatory successfully complete the training.	EC_HRM-03c_1 Review completion of regulatory trainings for all employees

## II RTO Delegation RACI

For bribery and corruption risks, Compliance has delegated the RTO responsibilities as set out in the *Enterprise Risk Management Policy (101-21-06)* as described in the overview below. Compliance remains accountable for the bribery and corruption risks framework as a whole. More details on the roles and responsibilities of Compliance, SIM, I&ORM and others can be found in the *CAAML Policy (102-20-20)*, *HR Risk Policy (108-30-10)* and the *Third Party and Outsourcing Policy (108-70-20)*.

	Bribery and Corruption risk RTO	Bribery and Corruption risk RTO for client integrity		Bribery and Corruption risk RTO delegate for organisational & employee integrity	Bribery and Corruption risk RTO delegate for third party integrity
The RTO's main responsibilities include:	Compliance	Compliance	SIM	SIM	I&ORM
a. Setting the risk management framework for the management of the risk type, that includes maintaining policies, setting risk appetite for the risk type, setting minimum control requirements.	A	R		R	R
b. Monitoring, reporting and escalation of risks.	A	R		R	R
c. Responsible for translating applicable regulations into internal requirements set in policies.	A	R		R	R
d. Keeping oversight of the implementation of policies and adherence/compliance with regulations.	A	R		R	R
e. Challenging the first line in the execution of the risk management framework.	A	R	S	R	R
f. Providing control and oversight to ensure the risk type is managed appropriately by the first line, according to the Bank's policies and procedures and within the risk appetite that is agreed.	A	R		R	R
g. Understanding the causes and the impacts of the risk.	A	R	S	R	R
h. Providing support in defining appropriate risk response plans and being responsible for monitoring the risk responses.	A	R		R	R
i. Monitoring when the risk occurs, or is likely to occur, at portfolio or transaction level.	A	R	S	R	R
j. Providing support in performing qualitative and quantitative risk analysis for their risk type.	A	R	S	R	R

### III – Main regulatory scope

The following regulations have been considered to define the requirements that are described in this policy.

Authority/ Legislator	Name of the regulation	Reference	Sections
Dutch Ministry of Finance	Dutch Criminal Law (Wetboek van Strafrecht)	WvSr	Articles 177, 178, 178a, 328ter, 363, 364 en 364a
Dutch Ministry of Finance	Prevention of Money Laundering and Terrorist Financing Act (Wet ter voorkoming van witwassen en financieren van terrorisme)	Wwft	Chapter 2_Section 2.1 Client Due Diligence Article 3 (1, 2, 3, 4, 5, 8, 9, 11, 12, 15) Article 3a (1 -3) Article 4(1 -4, 6) Article5 (1, 3 -5)
EBA	Guidelines on internal governance	EBA/GL/2021/05	103.c 99, and; 104
EU	Directive (EU) 2018/1673 of the European Parliament and of the Council of 23 October 2018 on combating money laundering by criminal law		
EU	E.U. Convention drawn up on the basis of Article K.3 (2) (c) of the Treaty on European Union on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union. Official Journal C 195, 25/06/1997	EU	
EU	EU Council Framework Decision 2003/568/JHA of 22July 2003 on combating corruption in the private sector.	2003/568	
European Commission	DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on combating corruption, replacing Council Framework Decision 2003/568/JHA and the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union and amending Directive (EU) 2017/1371 of the European Parliament and of the Council	2023/0135	
UK	Bribery Act 2010, The Bribery Act 2010 Guidance	2010 c. 23	Sections 1, 2, 3, 6, 7, 8 and 9, and; 6 principles (Annex)
US	Foreign Corrupt Practices Act (FCPA)	United States Code, Title 15 - Commerce and Trade, Chapter 2B	Sections 15 U.S.C. §§ 78dd-1 to 78qq
US	Foreign Extortion Prevention Act (FEPA)		18 U.S.C. § 201

In this policy, the minimum requirements listed above have been complemented with internal requirements for (risk) management in line with the risk profile of the Bank.