

Bribery and Corruption Policy Overview

2022

The **co-operative** bank

Bribery and Corruption

The Co-operative Bank plc (The Bank) has zero tolerance of bribery and corruption. The Bank is committed to acting with integrity and fairness in all its business dealings and commercial relationships. Bribery is a serious criminal offence. The Bank conducts its business fairly and lawfully and will not tolerate:

- The giving or receiving of improper monetary or other inducements in commercial relationships.
- Any other inappropriate practice which might be perceived to influence improperly a person's conduct in their professional or public duty.

By adopting this approach the Bank aims to protect the interests of our customers, shareholders and employees and minimise the associated risk to the reputation of the Bank.

The Bank works within all relevant laws and regulations.

The Bank is committed to ensuring that we act responsibly and ethically, both when pursuing business opportunities, and when awarding business. Consequently, we have adopted minimum standards, procedures and controls to ensure our employees and any other party we do business with understand these obligations and abide by them whenever they act on our behalf.

The Bank limits its exposure to bribery or corruption by:

- Giving a clear message from the senior management of the Bank that we operate a policy of zero tolerance to bribery and corruption.
- Conducting risk assessments on all the Bank businesses to identify, mitigate and control potential bribery and corruption risks.
- Conducting due diligence on associated parties, with enhanced due diligence conducted on those deemed to be high risk.
- Ensuring that anti-bribery and corruption clauses are included in contracts with associated parties.
- Delivering annual mandatory anti-bribery and corruption training for all employees with additional training for higher risk employees.
- Implementing a Code of Conduct and guidance that describes the minimum standards to be followed by all employees in relation to the giving and receiving of gifts and hospitality and identifying and reporting conflicts of interest.
- Encouraging the reporting of any suspicions of bribery and ensuring that appropriate procedures are in place to process sensitive information, investigate accordingly and implement any control enhancements necessary.
- Supporting the regulatory and law enforcement agencies in any prosecutions and ensuring that allegations of bribery or corruption are thoroughly investigated.