



# ANTI-BRIBERY POLICY STATEMENT

## Acting with the highest standards

We have a moral and ethical duty to act with the highest standards of integrity and honesty at all times in delivering our strategy to be the best bank for customers. We will not tolerate acts of bribery or corruption committed by any of our employees, including the Board of Directors, and any third parties who act on our behalf. Our commitment to anti-bribery and corruption builds on our corporate responsibility to our customers, shareholders and colleagues to deter, prevent, detect and respond to those who would seek to use the Group to facilitate any form of financial crime.

We define bribery as *'an offer or acceptance of any gift, fee, reward or other advantage to or from any person as an inducement to do something in the conduct of the Group's business, which is dishonest, illegal or a breach of trust'*. This includes offers and promises to give, as well as requests and agreements to receive bribes. We define corruption as a term used to describe a wide range of misconduct of which bribery can be a part; it is often associated with 'the abuse of entrusted power for private gain'.

## Compliance with legislation and regulation

We make sure that our Anti-Bribery Policy includes the requirements of all relevant laws and regulations, in particular the UK Bribery Act 2010 (which applies to us wherever in the world we operate), the U.S. Foreign Corrupt Practices Act of 1977 and the requirements of our primary regulator, the Financial Conduct Authority.

Our Policy is also informed by the Guidance issued by the UK Ministry of Justice to support the UK Bribery Act and establishes a number of control requirements and standards applicable to all our businesses, requiring implementation of appropriate additional processes and procedures relevant to the bribery risk in their specific business, operations and jurisdiction.

We are well placed to meet the expectations of the law, regulations and guidance and we ensure that our anti-bribery control environment continues to evolve and mature. Neither Lloyds Banking Group, nor to the best of our knowledge any of our current Directors, is subject to any material pending investigation or proceedings under anti-corruption legislation.

### **Providing a clear framework for colleagues**

We are committed to demonstrating senior management engagement with and endorsement of our approach to bribery prevention through a public commitment from our Group Chief Executive and Chairman in our Codes of Responsibility. We are also a signatory to the UN Global Compact, including principle 10: 'Businesses should work against corruption in all its forms, including extortion and bribery'.

Our Anti-Bribery Policy requires all employees, including Directors and Non-Executive Directors and anyone acting on our behalf (agents, other intermediaries, contractors, subcontractors and suppliers) to act with honesty and integrity and in accordance with the behaviours set out in our separate Codes of Personal and Business Responsibility and Code of Supplier Responsibility.

Employees and those acting on our behalf are prohibited from paying, offering, accepting or requesting a bribe, in any form; from making facilitation payments, even where this may represent local practice or custom; and from taking any action to circumvent established controls to deter, prevent, detect or respond to bribery.

We have a dedicated whistleblowing service (known as "Speak Up"), through which our colleagues can report instances of suspected, attempted or actual bribery. We support colleagues who do speak up and no colleague will be discriminated against in any way as a result of raising an issue in good faith.

### **Implementing a risk based approach to mitigation**

To help ensure our business is conducted without bribery and corruption, we are committed to:

- Conducting regular risk assessments of our business practices to identify, mitigate and control potential bribery and corruption risks;
- Risk assessing and undertaking appropriate due diligence of third parties acting on our behalf to allow us to be satisfied that the third party is genuine and one which we can trust to do business without bribing. This may include terminating relationships in some instances;
- Running implementation, oversight, assurance and audit programmes to demonstrate compliance with Anti-Bribery Policy requirements;
- Reporting regularly on progress to the our Risk Committees;

- Ensuring that requests to engage in giving or receiving charitable donations, event sponsorship and gifts, entertainment and hospitality do not lead to unacceptable levels of risk;
- Ensuring that anyone found to be involved in bribery is considered for internal disciplinary action in line with our disciplinary policy; and
- Supporting law enforcement and regulatory bodies in any prosecutions by investigating and reporting promptly.

We provide mandatory training and awareness programmes for all our colleagues, including temporary staff and contractors. We also work with third parties acting on our behalf to ensure that their employees are provided with appropriate training and awareness activity on a regular basis.

**Contact details**

If you have any questions or require further information about our commitment to preventing bribery and corruption, please contact us:

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