



Anti Bribery Policy Statement

This is the Anti-Bribery Policy Statement of BMCE Bank International Plc (BBI):

Policy statement:

BBI expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. BBI also expects the same approach to doing business from its business partners, contractors and suppliers.

Pursuant to this BBI will not tolerate bribery or corruption in any form and has a “zero tolerance” approach to any breach of this policy.

Application:

This means that BBI and its employees will never seek, accept or give a bribe, facilitation payment, kickback or other improper payment. We must also always ensure that we operate with appropriate transparency in all our business dealings.

BBI Policy:

- We will carry on our business fairly, honestly and openly;
- We will not make bribes so as to gain a business advantage nor will we condone the offering of bribes on our behalf;
- We will not accept bribes to influence business nor will we agree to bribes being accepted on our behalf;
- We will avoid doing business with others who do not accept our values and who may harm our reputation;
- We will maintain processes, procedures and records that limit the risk of direct or indirect bribery;
- As far as possible we will ensure that all our business partners are aware of our bribery policy;
- We promote employee awareness of, and compliance with, company policies and disciplinary actions against bribery and corruption through appropriate dissemination of our own procedures and training programs on an ongoing basis;
- We do not make illegal or inappropriate contributions to candidates for public office or to political parties or organisations;
- We will review this policy regularly and update it when necessary.