

# Anti-Bribery and Corruption.

Financial crime is increasing and becoming more complex, so here at Together we are committed to countering it. Our Anti-Bribery and Corruption policy provides a framework to ensure that the Group has a structured and consistent approach for managing bribery and corruption risk in line with legal and regulatory requirements.

Bribery and corruption in the context of this policy includes, but is not limited to: the giving/receiving of bribes; extortion; fraud; embezzlement; conflicts of interest; illegal financing of political parties; facilitation payments; and the giving/receiving of gifts.

## Our Vision and Beliefs.

The Group's Vision to be the most valued lending company in the UK drives the design ethos for building both the products and the operational processes that supports them.

Our beliefs form the foundation of the Group policy design criteria. This criteria has informed the risk policies with a line of sight from the defined risk and its ownership, the risk appetite, where it arises, and the manner of its control.

## Accountability.

Our Anti-Bribery and Corruption Policy (AB&C), along with all our other Policies and Standards, apply to all colleagues including temporary colleagues, contractors, suppliers and third parties that carry out activities on behalf of the Group and its subsidiaries.

Our Group Chief Compliance Officer, sponsors adherence to the AB&C Policy at Board level. However, our Head of Financial Crime who acts as the Group's Money Laundering Reporting Officer (MLRO) is responsible for developing the AB&C Policy and securing the review and approval of the policy from the appropriate stakeholders, overseeing the Group's compliance with the AB&C Policy, reporting on compliance and providing assurance on the implementation of key controls.

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The MLRO, together with the Financial Crime Team maintains the AB&C Policy, other supporting financial crime policies and procedures and provides appropriate guidance materials to support effective policy implementation.

The Group executes its system of internal controls and risk management activities through the three lines model, at both a Group and divisional level.

## **Purpose.**

Our AB&C policy is intended to provide a framework to ensure that that the Group has a structured and consistent approach for managing bribery and corruption risk in line with legal and regulatory requirements.

The purpose of the policy is to ensure that bribery and corruption risks are managed in line with the Group strategic plan and within agreed risk appetite. It outlines the approach we have in place to minimise the risk of the Group failing to reasonably prevent bribery or corruption.

Underpinning the policy is a range of controls, which include (but is not limited to):

- Gifts and hospitality reporting and reconciliation frameworks: sets the obligations of the Group and its colleagues in relation to the reporting, acceptance and monitoring of gifts and hospitality
- Procurement controls: the Group conducts risk-based due diligence on our suppliers and intermediaries to assess money laundering risks and conflicts-of-interest
- Colleague vetting measures (including the identification of conflicts): All colleagues are subject of relevant vetting checks both prior to, and periodically during, employment. Colleagues in regulated, or higher risk, roles are subject to enhanced vetting measures and more frequent ongoing checks
- Charitable donations framework: Details the minimum standards, which all colleagues must follow to enable adequate control over charitable donations (including corporate sponsorships)

Colleague training, and governance arrangements to oversee the performance of AB&C policies are controls, are also in effect.

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The operational effectiveness & design adequacy of the Financial Crime Programme is monitored via:

- First Line Quality Assurance
- Training & Competency framework
- Key Performance Indicators / Key Risk Indicators
- Second Line Control reviews & Control Testing
- Dedicated Financial Crime monitoring function (with the remit to review any business area)
- Periodic internal audits
- Ad Hoc external audits

Any suspected activities in breach of this policy can be raised confidentially in-line with our Whistleblowing Policy. Employees found to be in breach of this policy will be disciplined, and this may result in termination of employment.

The Anti-Bribery and Corruption policy is also subject to at least an annual review in order to ensure it remains accurate and fit for purpose.