



Corporate statement - Bribery & Corruption

Zenith Bank (UK) Limited (“ZBL”) recognizes that bribery and corruption have an adverse effect on communities wherever they occur and, if endemic, can threaten laws, democratic processes and basic human freedoms, impoverishing states and distorting free trade and competition. Corruption is often associated with organized crime, money laundering and on occasions the financing of terrorism. In addition, the level and efficacy of investment and financing can be reduced, particularly within economically disadvantaged societies.

We define bribery as where a person requests, agrees to receive or accepts a “financial or other advantage” intending that, in consequence, a relevant function or activity should be “performed improperly” (whether by that person or another person). “Improper performance” means an act or omission in breach of an expectation of good faith, impartiality, or a position of trust.

ZBL is committed to applying high standards of honesty and integrity consistently across our global operations and in all our business dealings. Our Bribery Policy reflects the statutory requirements applicable to the UK, including the Bribery Act 2010 and also those derived from the UN and OECD conventions on corruption.

ZBL Bribery Policy applies to all its employees as well as agency workers, consultants and contractors, irrespective of their location, function, grade or standing.

We expect our business partners, suppliers and contractors to act with integrity and without thought or actions involving bribery and, where appropriate, we include clauses to this effect in relevant contracts.

ZBL’s Bribery Policy requires employees:

- Not to offer or make any bribe, unorthodox or unauthorised payment or inducement of any kind to anyone;
- Not to solicit business by offering any bribe, unorthodox or unofficial payment to customers or potential customers;
- Not to accept any kind of bribe, unorthodox or unusual payment or inducement that would not be authorised by ZBL in the ordinary course of business;
- To refuse any bribe or unorthodox payment and to do so in a manner that is not open to misunderstanding or giving rise to false expectation; and to report any such offers;
- Not to make facilitation payments (these are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement);
- To report any breaches of the policy, related principles or standards or of any associated legislation.

Our “Whistle Blowing” policy and guidance is available to any employee who encounters a breach or potential breach of policy. They can report concerns in confidence and without fear of reprisals via a dedicated email address. All reports raised are taken seriously and, where appropriate, investigated in more depth. No employee is discriminated against in any way as a result of reporting a concern in good faith.

Our policy on bribery is supported by governance procedures covering monitoring of adherence and record keeping. Any breach of policy by any employee will be considered as grounds for disciplinary action, which may include dismissal.