



# Anti-Bribery & Corruption Policy

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## 1. Introduction

Corruption connects to fundamental negative impacts such as poverty in transition economies, damage to the environment, abuse of human rights, abuse of democracy and undermining the rule of law. The Group has a zero tolerance approach to corruption and is committed to managing its corruption related impacts and demonstrating adherence to integrity, governance and responsible business practices.

The Group is required by the UK Bribery Act and other similar measures in place in the markets in which it operates to ensure that appropriate arrangements are in place to deal with the risk of bribery and corruption and to have systems and controls for their prevention.

## 2. Policy Purpose

This policy sets out what is meant by bribery and corruption together with the Group's expected standards and procedures to manage bribery and corruption risks in all of its global operations.

## 3. Policy Scope

This policy applies to anyone working for the Group or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, contractors, customer representatives, external consultants, third-party representatives and business partners. This policy will be translated into the languages of the countries where the Group does business.

## 4. Definitions

The following definitions are used in this policy:

<b>Bribe</b>	A financial or other inducement or reward to a person with the intention that the advantage induces a person to perform improperly a function or activity, or it rewards a person for the improper performance. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
<b>Bribery</b>	Includes offering, promising, giving, accepting or seeking a bribe.
<b>Corruption</b>	The abuse entrusted power for private gain which can be instigated by individuals or organisations.
<b>Group</b>	International Personal Finance plc and all companies in which it directly or indirectly owns or controls the voting rights attaching to not less than 50% of the issued share capital or controls the appointment of the majority of the board of management.



## 5. Policy Requirements

### 5.1 What is corruption?

Corruption includes practices such as bribery, facilitation payments, fraud, extortion, collusion, and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the enterprise's business. This can include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage, or that can result in moral pressure to receive such an advantage. You must not engage in any such practices and you are expected to report any such practices of which you become aware in accordance with paragraph 5.4 below.

### 5.2 What is bribery?

All forms of bribery or corruption are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with a member of your Legal or Fraud team.

Under the UK Bribery Act, if a person associated with the organisation bribes another person, intending to obtain or retain business or a business advantage for the organisation, the organisation is guilty of an offence. The individuals involved may also face criminal liability.

We operate controls and procedures to minimise the risk that no one acting on the Group's behalf:

- offers, promises or gives a bribe;
- requests, agrees to accept or receives a bribe; or
- bribes a public official to obtain or retain business or an advantage.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept or indicate your acceptance of any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- do anything to encourage or condone anyone else, including any consultant or adviser acting for the Group, to make an improper payment;
- allow covert commissions or payments to be made. This includes arrangements made with politically influential individuals or companies, regulators or authorities, public affairs advisers or other organisations, where the fees are disproportionate to the legitimate services offered; or
- enter into or continue a relationship with a third party if you are aware of or suspect improper conduct.

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.



### 5.3 What we do to combat bribery and corruption

The Group has in place arrangements designed to mitigate the risks associated with bribery and corruption. The Group undertakes risk assessments for corruption in accordance with defined procedures. Actions identified through this risk assessment process are undertaken in line with agreed timescales to ensure the risks in this area are appropriately mitigated.

Additional activities are in place to deal with risks arising from bribery including annual compliance checks and assessment against the requirements of the UK Bribery Act in all markets in which the Group operates.

The Group provides training opportunities for colleagues on combating bribery and corruption related risks and ensure these requirements are communicated to colleagues.

The Group records confirmed incidents of corruption and identifies root causes which require further action to address.

### 5.4 How to raise a concern

If you believe you have witnessed an act of bribery or corruption or are faced with blackmail or extortion of any kind, you must report the incident immediately. Please report all instances of suspected bribery to your local management or local Legal Director, or directly to the Chief Legal Officer, or please report it using the Group’s whistleblowing channel which enables you to report anonymously if you wish. To raise a concern through the Group’s independent whistleblowing channels go to <https://report.whistleb.com/en/ipf> for European, IPF Digital or Group related matters or <https://hacerlocorrecto.ethicsglobal.com/> for Mexico. Please see the Whistleblowing Policy for more details.

### 5.3 Gifts and hospitality

Please see the Gifts and Hospitality Policy for details on procedures for giving or accepting gifts of an appropriate type and value or reasonable and appropriate hospitality for legitimate purposes. Procedures for expense claims are set out in the Expenses Policy.

## 6. Roles and Responsibilities

<b>Group Fraud Risk and AML Manager</b>	Establishment and implementation of frameworks to manage corruption risk, assurance processes across all markets, investigation, monitoring and reporting of incidents.
<b>Loss Prevention Committees</b>	Oversight of local implementation of frameworks to manage corruption risk and monitoring of incidents.
<b>Local Market Boards</b>	Putting in place procedures and controls to comply with this policy, setting up and enforcing compliance arrangements specific to their businesses and dealing with any breaches and reporting them to the Chief Legal Officer.
<b>Audit and Risk Committee</b>	Overseeing the effectiveness of the Group’s procedures for detecting corruption and its systems and controls for the prevention of bribery.
<b>Everyone</b>	Reporting any and all instances or suspected bribery or corruption in accordance with this policy.



## 7. Policy governance

### 7.1. Breaches and Exceptions to Policy

<b>Breaches</b>	All breaches of this policy must be notified to the Chief Legal Officer. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.
<b>Exceptions to Policy</b>	No deviations from this policy are permitted.
<b>Whistleblowing</b>	To raise a concern through the Group's whistleblowing channels go to <a href="https://report.whistleb.com/en/ipf">https://report.whistleb.com/en/ipf</a> for European, IPF Digital or Group related matters or <a href="https://hacerlocorrecto.ethicsglobal.com/">https://hacerlocorrecto.ethicsglobal.com/</a> for Mexico

### 7.2. Assurance

<b>Owner</b>	This policy is owned by the Chief Legal Officer.
<b>Assurance mechanisms</b>	Annual training for all employees and customer representatives. Annual compliance checks including assessment against the requirements of the UK Bribery Act in all markets. Bi-annual reporting to the Audit and Risk Committee.

## 8. Related Policies

Gifts and Hospitality Policy
Expenses Policy
Responsible Procurement Policy
Whistleblowing Policy