
Eurobank Private Bank Luxembourg SA Anti-Bribery & Corruption Policy Statement

Scope & Applicability of the Anti-Bribery & Corruption Policy

Eurobank Private Bank Luxembourg SA (“the Bank”) conducts business in an honest and ethical manner and takes a zero tolerance approach to bribery and corruption. It is committed to acting professionally, fairly and with integrity, in all its business dealings and relationships wherever it operates, and in implementing and enforcing effective systems to counter bribery and corruption.

Eurobank Private Bank Luxembourg SA follows leading business practices, having accepted, and integrated into its culture the ten principles of the UN Global Compact. The 10th Principle on Anti-Corruption states that “Businesses should work against corruption in all its forms, including extortion and bribery”, so Eurobank Private Bank Luxembourg SA will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business.

This Policy applies to all individuals, entities and third parties working for or on behalf of Eurobank Private Bank Luxembourg SA at all levels and grades, whether permanent, fixed-term or temporary, and wherever located. In addition, the Policy applies to the branches of Eurobank Private Luxembourg SA located in Athens and in London and any other future entity of the Bank that have access to the Bank’s records and facilities and collaborate in any manner with the Bank on a contractual basis, modified if necessary to accord with local legal and regulatory frameworks.

Failure to comply with the policy may lead to legal and/or disciplinary actions against individuals and Eurobank Private Bank Luxembourg SA.

Definitions of Bribery and Corruption

Bribery

Bribery is the offering, promising, giving, accepting or soliciting of money, a gift or any other advantage as an inducement to do something that is illegal, or a breach of trust, in the course of carrying out the Bank activities. It is illegal to give or receive a bribe and the Bank must have adequate procedures in place to prevent such actions, otherwise it too may be liable to legal action.

Bribes can take many different shapes and forms, but typically they involve corrupt intent with a 'quid pro quo' i.e. both parties will benefit approach. A bribe could include a:

- direct or indirect promise, offering, or authorisation, of anything of value;

- offer or receipt of any inducement, loan, fee, reward or other advantage; and/or
- giving of aid, donations or voting designed to exert improper influence.

Examples of bribery include:

- a customer offering payment or gift to a member of staff so that a new account can be opened, when the application would normally be rejected;
- a potential supplier offering money or a gift in order to influence a tendering process; or
- a job applicant offering payment in order to increase his/her chance of being offered employment.

Corruption

Corruption is a form of dishonesty or a criminal offence, which is undertaken by a person or entity entrusted with a position of authority and trust, in order to acquire illicit benefits or abuse power for their own gain.

Corruption can also take many forms including:

- using a position of power to force others to perform illegal or immoral acts;
- falsification of corporate records; and/or
- agreements that lead to distortion of competition.

Examples of corruption include:

- the recent “inter bank offer rate” collusion;
- managers getting their direct reports to pay for products or services, so that they can authorize it; or
- misappropriation of corporate assets.

Basic Principles for dealing with Bribery and Corruption

Eurobank Private Bank Luxembourg SA adopts leading international practices to manage and address bribery and corruption risks, using the following principles:

- Zero tolerance to bribery and corruption;
- Establishes and follows effective control procedures to prevent or identify bribery and corruption;
- Ensures the implementation of a control program;

- Provides efficient, confidential reporting mechanisms to staff and encourages their use by providing protection to individuals who report in good faith. Staff are encouraged to report bribery attempts by third parties;
- Establishes mechanisms for monitoring incidents of bribery;
- Adopts regular risk assessment mechanisms of the Bank's operations, which it oversees, reviews, adapts and revises;
- In the context of the ongoing risk assessment, a record of bribery complaints and/or incidents is maintained;
- Records in a formal questionnaire the minimum requirements of the Bank towards third parties regarding bribery issues; and
- Provides ongoing training and briefing of staff on the prevention and identification of bribery and corruption incidents.

Areas of specific interest

Sponsorships and charitable donations

As part of its strategic plan, Eurobank Private Bank Luxembourg SA incorporates funds for offering and strengthening charitable, social, cultural and educational programs. Due diligence is conducted on the persons applying for sponsorship.

Sponsorships and donations to political parties

Sponsorships and donations to political parties are not permitted.

Facilitation and kickback payments

Eurobank Private Bank Luxembourg SA maintains a zero tolerance approach to facilitation payments and does not allow kickbacks to be made or accepted.

Foreign officials and clients

Eurobank Private Bank Luxembourg SA does not permit bribery of foreign officials. This does not only apply to the staff of the Bank but also includes when we become aware of any of our clients performing such actions.

Employee training

On a regular basis, through training modules and internal communication, staff awareness is raised on emerging risks when dealing with cases of bribery and corruption. Training is provided to all new staff.

Transparency

The policy is reviewed and revised every year by the Compliance Department of the Bank, unless legislative changes require earlier revision.

Compliance periodically informs the Audit Committee and Management of the results and effectiveness of the Anti-Bribery and Corruption program. The Annual Financial Report includes reporting on Anti-Bribery and Corruption.

Reporting Bribery and Corruption Cases

The Bank, both through this Policy and as defined in the Whistleblowing and Reporting Unethical Conduct Policy, encourages the reporting of bribery and corruption incidents by both staff and third parties. For this reason, it has established a mechanism for submitting and monitoring anonymous reports and protects bona fide witnesses.

Every member of staff or any concerned third party shall raise any concerns through one of the alternative channels below:

- a) Send an e-mail to EthicsHotline@eurobankpb.lu (to the attention of the Report Receiving and Monitoring Department).
- b) Send a letter to the mail address: 534, rue de Neudorf L-2220 Luxembourg.
- c) Call the relevant telephone line: + 352 420 724 111 and leave a message on the answering machine, which is available 24/7, all year round (to the attention of the RRMD).
- d) Other internal parties that may receive reports of that nature (Internal Audit, Governance and Internal Control etc.), inform and forward the report to the designated RRMD.
- e) At the request of the person making the report, through a face-to-face meeting with the RRMD within a reasonable time.
- f) Send an email to ethicshotline@eurobank.gr.
- g) Send a letter to the mail the Group Compliance address 2-6 Pasmazoglou Street, 105 59, Athens (to the attention of the RRMO).
- h) Call the relevant telephone line (0030 2144058990 or ext. 58990) and leave a message on the answering machine, which is available 24/7, all year round (to the attention of the RRMO).
- i) Other internal parties that may receive reports of that nature (Group Compliance, Internal Audit, etc.), inform and forward the report to the Group RRMO.

Disciplinary process

Eurobank Private Bank Luxembourg SA has clear disciplinary procedures that are implemented timely and fairly for all staff members, irrespective of hierarchy.

The Bank reserves the right to refer cases to the police, judicial and/or supervisory authority and to bring legal action, either civil and/or criminal, against those involved in the case. It may also take disciplinary actions against staff, including dismissal.

When cooperating with third parties, natural or legal, a written acceptance is obtained of their obligation to prevent and combat against bribery and corruption. If cases of corruption are identified, the cooperation is denounced.