

Anti-Bribery & Corruption Policy

Updated July 2019



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Introduction

AIB takes a zero tolerance approach to bribery and corruption across all jurisdictions that we operate in.

We all must act with honesty and integrity in relation to all business activities and customer engagements that we undertake on behalf of the Bank. This policy complies with applicable anti-bribery and anti-corruption legislation in all the jurisdictions in which we operate.¹

Scope

This policy applies to all those working in or for AIB

The policy forms part of our Code of Conduct and should be read in conjunction with and its supporting policies.

Policy Statement

AIB believes in open and fair competition. We do not engage in or accept any form of bribery, collusive anti-competitive discussions or agreements. We do not abuse our position in any of the markets that we operate in to gain unfair or unethical advantage.

What is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage, whether received intentionally or unintentionally.

What is Corruption?

Corruption can be defined as the abuse of entrusted power for private gain of the individual or company. Corrupt business practices put the interests of an individual or company before the interests of the environment, customers, societies, communities and other key stakeholders.

Standards

- You or anyone in which you have a relationship with can never offer, give, promise, provide, solicit, request, accept or agree to receive anything of value, whether cash or in any other form (directly or indirectly), intentionally or otherwise to or from any person or entity wherever located for the purpose of:
 - Gaining any commercial, contractual, or regulatory advantage for AIB in any way which is unfair or unethical.

¹ The Criminal Justice (Corruption Offences) Act, 2018 in Ireland, the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act.

- Gaining (or engaging in conduct that could be viewed as gaining) any personal advantage, pecuniary or otherwise, for you or anyone in which you have a relationship or close links with.

Including: from or to any person, organisation, charity or company (regardless of their location), from or to any employee, director, agent, consultant, contractor or other person or body acting on AIB's behalf. Any benefit offered or received by you while working for AIB must be in accordance with our Conflicts of Interests Policy.

- You are prohibited from improperly offering, promising or transferring anything of value (directly or indirectly) to a public official where ever located in order to:
 - Influence the public official in the exercise of their public functions.
 - Obtain or retain business for AIB.
 - Secure advantage for AIB, its employees or any other entity, person, including anyone with whom you have a relationship or close links.
- The Bank will investigate any actual or suspected breaches that it becomes aware of. Under law, any gift, benefit or advantage received by a staff member will be presumed to be corrupt, unless proven otherwise.
- You are responsible for ensuring your adherence to this policy in order to prevent any acts of **'bribery'** or **'corruption'**.
- Non-compliance is both an offence for you and the Bank. We will take any breaches seriously and we will address any breaches under our disciplinary procedures, which includes sanctions up to dismissal, or termination of contract/assignment. In addition, you may potentially be subject to fines and/or imprisonment in the event of a criminal prosecution.
- The Bank may be required to report any confirmed instances of bribery or corruption to the relevant law enforcement authority and to support in any legal or statutory process in respect of employees being accused of bribery and/or corruption. The Bank may also seek financial restitution by civil means in respect of any losses sustained as a result of breaching this policy.
- All AIB businesses, functions, subsidiaries and branches are responsible for complying with and maintaining relevant procedures to ensure the prevention of bribery & corruption, in accordance with those set out in our Conflicts of Interest procedures.
- If you see something while you are working for AIB that you think may be wrongdoing, particularly in respect to either bribery or corruption then you are required to report it. You can do this confidentially under our Speak Up Policy.

Guidelines

- The policy is to be read in conjunction with the Code of Conduct and the Conflicts of Interests Policy and Guidelines.
 - Remember that our Conflicts of Interests Policy, also sets out guidelines in relation to gifts, benefits and hospitality.
 - Certain business areas may have additional obligations under this policy and their ExCo -1 team member is responsible for identifying, ensuring the development and application of local procedures to address these.
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Supporting information

- Conflicts of Interests Policy and Gifts, Benefits and Hospitality Appendix
- Roles and Responsibilities
- FAQ's
- Speak Up Policy
- Code of Conduct and all its supporting policies
- Outsourcing and Cloud Policy
- AIB Policy For Compliance with the Regulation of Lobbying Act 2015
- Anti-Money Laundering and Countering the Financing of Terrorism (AML & CFT) Policy

<i>Policy Implementation date:</i>	<i>30.07.2018</i>
<i>Last updated with changes:</i>	<i>30.07.2019</i>
<i>Policy is reviewed:</i>	<i>If changes required by legislation or the business</i>
<i>Policy Owned by:</i>	<i>Head of Governance & Regulation, HR</i>