



Anti-Bribery and Corruption Policy

Anti-Bribery and Corruption Policy – Summary

1. Policy Overview

HNB Assurance PLC and HNB General Insurance Ltd ("the Group") have adopted an Anti-Bribery and Corruption Policy to ensure integrity and legal compliance in all transactions. The policy prohibits involvement in corrupt practices and mandates accurate and transparent record-keeping of all business dealings.

2. Policy Ownership

The Heads of Human Resources oversee the implementation and enforcement of the Anti-Bribery and Corruption Policy.

3. Scope

The policy applies to all Directors, officers, and employees of the Group, ensuring adherence to ethical and legal standards.

4. Compliance Requirements

The Group must comply with anti-corruption laws, including the Anti-Corruption Act No.09 of 2023. Bribery and improper inducements are strictly prohibited, and any gifts or benefits must be controlled and reported according to policy guidelines.

5. Entertainment, Gifts, and Gratifications

The policy restricts the acceptance and offering of gifts, entertainment, and gratifications. Any exceptions to these limits require prior approval and subject to the terms and condition of the policy.

6. Accurate Accounting and Record Keeping

All transactions must be accurately recorded to meet legal and regulatory requirements. The Group requires robust internal controls to document payments and gifts.

7. Employee Obligations

Employees must follow anti-corruption laws and internal policies in all business activities, including dealings with third parties and charitable contributions.

[1]

This policy is relevant to both HNB Assurance PLC and HNB General Insurance Ltd.

8. Non-Compliance

Violations of the policy may lead to disciplinary action, including dismissal, and potential legal penalties. Employees must cooperate with investigations and report any concerns.

9. Risk Assessment

The Group conducts annual risk assessments to identify and mitigate bribery and corruption risks, with findings reviewed by the Board Integrated Risk Management Committee.

10. Training

Employees will receive training on anti-bribery and anti-corruption practices. The policy will be available on the Group's website and intranet, with additional training provided as needed.

11. Governance

The policy is reviewed and updated as necessary, with internal audits assessing compliance annually. The Compliance Department conducts periodic reviews and reports to the Board Risk Management Committee.

12. Definitions

The policy defines key terms such as "Facilitating Payments," which are prohibited, and "Anything of Value," covering various benefits. It also clarifies the scope of "Bribery" and "Corruption" to ensure a clear understanding of prohibited conduct.