

# Public Policy Statement on Anti-Bribery and Anti-Corruption within Handelsbanken plc

June 2022

## 1. Introduction

Handelsbanken plc takes a zero tolerance approach to Bribery and Corruption and we are committed to conducting our activities free from any form of bribery and corruption.

Our Anti-Bribery and Corruption and Tax Evasion (AB&C) Policy and Standards extend to all Handelsbanken plc activities, and they are supported and endorsed by our Board of Directors, who are ultimately responsible for their implementation.

Our AB&C Policy and Standards outline the minimum requirements for Handelsbanken plc to adhere to all relevant laws and regulations, in particular the UK Bribery Act 2010, and the requirements and guidance issued by the Financial Conduct Authority, as our primary regulator in the UK.

The AB&C Policy applies to all departments, units and branches of Handelsbanken plc, and applies to all employees, contractors and agency staff. Handelsbanken plc, its staff, and any associated persons are prohibited from engaging in Bribery and Corruption, or any other financial crime. We expect the same zero tolerance approach from any third parties providing services for or on behalf of Handelsbanken plc.

The Bank's Policy also aligns to the requirements set out by its parent entity Svenska Handelsbanken AB (SHB) where a framework has been established to deter, prevent, detect and respond to those who would seek to use the Group to facilitate any form of financial crime.

## 2. Management at Handelsbanken plc and the conduct of employees

Our success is dependent on the confidence of customers, employees, owners, public authorities and other stakeholders that the Bank is acting in a responsible and ethical manner. Any instances of bribery, corruption, facilitation of tax evasion, or other improper influence would lead to loss of confidence in Handelsbanken plc.

Employees must carry out their responsibilities in all of their activities within the Bank, and their external assignments, in a manner that upholds confidence in the Bank, and must therefore not participate in transactions that may involve bribery, corruption or any other improper influence.

All staff must ensure that their interactions and relationships do not induce, or appear to induce, improper action in an effort to obtain or retain a business advantage. This includes careful consideration of giving and receiving additional benefits, including but not limited to:

- Gifts and entertainment;
- Charitable donations;
- Sponsorship and brand partnerships;
- Recruitment, and;
- Procurement.

The above list is not exhaustive, and consideration of proper and ethical conduct applies to all staff relationships, whether they relate to customers or external third parties to the Bank.

Within the AB&C and Policy and Standards there are a number of key principles that all staff must adhere to, ensuring that all activity:

- must be conducted without intent to bribe or corrupt, or to facilitate any financial crime;
- must be reasonable, transparent, and ethical;
- must not be lavish or disproportionate to the professional relationship;
- must be appropriately documented with business rationale; and
- must be authorised at an appropriate level of seniority.

Any gift accepted by or offered from Handelsbanken plc, with the aim of speeding up or in any other way influencing the processing of a matter with a public authority (facilitation payment), is regarded as a bribe and must not be accepted.

The Compliance department must be contacted if there are any doubts as to how a situation should be assessed.

### 3. Training

When they are first employed, and on an ongoing annual basis thereafter, all employees, Board members and associated persons must complete training courses regarding financial crime, which includes a separate module on Anti-Bribery and Corruption.

### 4. Intermediaries and other third parties

Any person representing the Bank is prohibited from offering or accepting bribes or facilitation payments, or from engaging in any other corrupt methods on behalf of Handelsbanken plc.

Intermediaries that represent the Bank, such as consultants, must be selected carefully, so that there is no risk of them damaging the Bank's reputation. The Bank must carry out the requisite control measures in order to acquire good knowledge of all the intermediaries with which the Bank will be collaborating. This also applies to third parties such as suppliers and introducers of business.

### 5. Whistleblowing

Handelsbanken plc has clear reporting channels for concerns relating to Bribery and Corruption. However, in the event that staff members feel unable, or if it would be inappropriate, to report any suspected or actual breaches of the Policy and/or relevant legislation through the usual channels, staff may use the methods set out in our Whistleblowing Policy.

### 6. Customer

Handelsbanken plc is committed to ensuring our accounts and services are not misused to facilitate the payment or receipt of bribes or funds from corrupt activity. Therefore, our AB&C Policy and Standards includes risk-based control measures that prevent our products and services from being used for Bribery and Corruption, or any other financial crime.

These measures include obtaining appropriate due diligence, transaction monitoring, and appropriate risk tolerance and customer exit processes.

### 7. Reporting of breaches

The Money Laundering Reporting Officer (MLRO) is responsible for considering and making any external reports arising from actual and/or suspected breaches of the Bribery Act 2010, and for notifying the Board or any relevant Governance Committees of identified material breaches involving colleagues or third parties associated with Handelsbanken plc.

### 8. Policy Review

The Bank's Policy relating to Bribery and Corruption and Tax Evasion is reviewed annually by the Board ensuring alignment to related financial crime policies, and adherence to all relevant legislation, regulation, and industry guidance.

### 9. Contact details

If you have any queries or require further information about our commitment to preventing Bribery and Corruption, please contact us:

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