

HATTON NATIONAL BANK PLC

POLICY ON ANTI-BRIBERY AND CORRUPTION

1. OVERVIEW

The Board of Directors of the Bank has adopted the Policy on Anti-Bribery and Corruption (the "**Policy**") in conformity with the Listing Rules to ensure that when carrying out its own transactions and dealings and transactions with and for Third Parties, those dealings and transactions are carried out with the highest standards of integrity and that all businesses and day to day operations at the Bank are carried out in compliance with all relevant laws and regulations inclusive of the Anti-Corruption Act. This document sets forth a summary of the Policy.

Any capitalized term not specifically defined in this Summary will have the meaning therefor set forth in the Policy.

2. PURPOSE

The purpose of the Policy is to establish a zero-tolerance stance against corruption in all Bank dealings, guiding Employees to avoid and report bribery.

3. SPECIFICS AND COMPLIANCE

- 3.1 The Bank will fully comply with all applicable laws and regulations.
- 3.2 The Bank will not promise, authorize, or make any payments of "anything of value" to individuals, including Government Officials, for the purpose of influencing decisions or securing improper advantages.
- 3.3 The Bank will not solicit, accept, or receive gifts, payments, or advantages as rewards for improper conduct.
- 3.4 The Bank will not make or facilitate Facilitating Payments to any individuals, including Government Officials, in connection with its obligations to Third Parties.
- 3.5 The Bank and its affiliates are committed to ensuring that no payments or transfers of value are made that could be construed as bribery, extortion, or other unlawful means of securing business advantages.

4. PERMISSIBLE AND RESTRICTED PAYMENTS

- 4.1 The Bank and its Relevant Parties must not solicit, demand, or accept entertainment or gifts from any external individuals or organizations.
- 4.2 The Bank and Relevant Parties shall comply with the guidelines issued on receiving gifts and entertainment from any stakeholder, recommended by the Human Capital

Department and approved by the MD/CEO, and administered by the CHRO from time to time, so long such receipts comply with existing guidelines approved by the Board.

5. GRATIFICATION

- 5.1 Individuals may not give, offer, or promise any form of gratification to others, directly or indirectly.
- 5.2 Individuals may not demand or solicit or receive or agree to receive any form of gratification for themselves or others, directly or indirectly.
- 5.3 Sexual bribery is strictly prohibited.

6. ACCURATE ACCOUNTING AND RECORD-KEEPING

All data created by the Bank and its Relevant Parties must accurately reflect actual transactions and events.

7. EXTERNAL STAKEHOLDERS

External Stakeholders must uphold the highest standards of business, professional, and legal integrity, refraining from any form of bribery or corruption in their dealings with the Bank. The Bank will not initiate or maintain any business relationship with External Stakeholders unless it is satisfied that their conduct aligns with the principles outlined in the Policy.

8. MAKING A DISCLOSURE

The Bank fosters a culture of honesty and ethical behavior. Employees must report any suspected bribery or corruption involving Directors, officers, Employees, their families, or others with business dealings with the Bank to the Whistleblower Protection Officer or in accordance with the procedure set out in the annexure to the policy.

9. NON-COMPLIANCE WITH THE POLICY

- 9.1 Any violation of the Policy may lead to disciplinary action, including termination of employment, in accordance with applicable laws and Bank policies. If External Stakeholders are found in violation of the Policy, the Bank may terminate its business relationship with them, as outlined in contractual agreements.
- 9.2 Employees must report any suspicious customer transactions related to bribery or corruption to the compliance officer. The Bank may pursue legal actions under relevant laws.