

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

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1.0 OBJECTIVE OF THE POLICY

Premium Trust Bank must comply with the requirements of all applicable anti-corruption laws, including the Nigerian and international statutes. Anti-corruption laws prohibit Premium Trust Bank from making payments, directly or indirectly, for the purpose of influencing an official act or decision, or for any other improper purpose in order to obtain or retain business.

This Policy reinforces Premium Trust Bank's global policy of maintaining impeccable standards of business and personal ethics.

2.0 POLICY STATEMENT

Premium Trust Bank conducts its business in an honest and ethical manner and has zero tolerance for bribery and corruption. It is committed to acting professionally, fairly and with integrity in all business dealings and relationships.

3.0 SCOPE AND PURPOSE

This Policy applies to Premium Trust Bank employees, directors and third parties engaged by or in collaboration with the Bank for the purpose of providing services or execution of a project. The Policy sets forth in a simple and clear manner, the most important standards of conduct and practices which must be followed in representing Premium Trust Bank. It also assures Premium Trust Bank's continued compliance with the anti-bribery provisions of relevant regulations, as well as with Premium Trust Bank's standards of business and personal ethics. It should be read in conjunction with other policies relating to approval of transactions, the Bank's Code of Professional Conduct and Ethics; as well as the use of Premium Trust Bank's assets and hiring of independent contractors.

4.0 WHO IS RESPONSIBLE FOR THIS POLICY?

The Chief Compliance Officer has the primary responsibility for the implementation of this Policy and for ensuring that enquiries on its interpretation and application are dealt with appropriately.

5.0 DEFINITIONS

5.1 "Bribe" is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

5.2 "Corruption" is the abuse of entrusted power for personal gain. This includes bribery, fraud and other related offences.

5.3 "Government" Any agency, instrumentality, subdivision, or other body of any Federal, State, or Local government, including governmental committees or commissions and regulatory agencies or government-controlled businesses, corporations, companies, or societies. Even if a company is not wholly owned by the State, it may be considered an "instrumentality" of a government if the government exercises substantial control over the company. Government-owned utilities, universities, and hospitals are examples of government instrumentalities".

- 5.4 "Government Official"** Any officer or employee of a government or any department, agency or instrumentality thereof or of a public international organization, or any person acting in an official capacity for or on behalf of any government or public international organization.
- 5.5 "Payment"** A payment of money or anything of value, including transfer of stock, bonds or any other property, payment of expenses, provision of services of any type, assumption of a debt or release from the obligation to pay a debt, or any other transfer of goods, services, tangibles or intangibles, made to influence the passage of law, regulations, the placement of contracts, the formulation of policy or other discretionary functions, that accrues to the benefit of the ultimate recipient or promotes his or her interest. This includes payments made to influence the recipient to misuse his or her official position to wrongfully divert business to the payor or its client".
- 5.6 "Concession"** Certain anti-corruption laws permit for the grant of certain concessions or exceptions to ensure the proper performance of a government official's routine, duties or actions, but which do not involve any discretionary action. In this regard, the terms of such concession or exception will be considered and approved by Senior Management of the Bank.
- 5.7 "Routine Governmental Action"** An action that is ordinarily and commonly performed by a government official. Examples of routine governmental action are:
- Obtaining permits, licenses, or other official documents to qualify a person to do business in an international country;
 - Expediting governmental papers, such as lawful customs clearances, obtaining the issuance of entry or exit visas; and
 - Providing police protection.
 - "Routine governmental action" does *not* include any decision by a government official to award new business or to continue business with a particular party or any action taken by a government official involved in the decision-making process to encourage a decision to award new business to or continue business with a particular party.
- 5.8 "Indirect Payment"** A payment made to anyone, including any third- party or its representative, independent contractor, agent, sub-contractor or sales representative, with the knowledge that the payment, or a portion of the payment, will be received by a government official".

5.9 "Employees" all permanent, part-time, temporary and outsourced staff of the Bank".

5.10 "Third Parties" all representatives, agents, contractors, sub-contractors, vendors, consultants and business partners directly or indirectly engaged by or is in collaboration with the Bank for the provision of a service or performance of a project".

5.11 "Red Flags" warning indicators of corrupt conduct by third parties. These include certain suspicious activities, factors and situations about a person or entity with whom the Bank has, or proposes to enter into, a business relationship or transaction, and other indicators as described in **Appendix A** of this policy.

5.12 "Higher Risk and Lower Risk Countries" Under this Policy, a higher risk country is a country with a score of below 5 in the Transparency International Corruption Perceptions Index ("CPI"), also outlined in **Appendix B** of this policy. A lower risk country is a country with a score of 5 or above.

6.0 Anti-Bribery Provisions:

The anti-bribery provisions prohibit all Premium Trust Bank's employees, directors and any third party from directly or indirectly:

- a) making, promising, offering, or authorizing a payment or a gift of anything of value to any government official, political party, party official, or political candidate for the purpose of influencing such recipients to use their official positions to help Premium Trust Bank obtain or retain business, direct business to anyone, or to secure any other improper advantage;
- b) making, promising, offering, or authorizing any payment or gift to an agent, business partner, or any other third party with the knowledge that or reason to know that a government official, political party, party official, or political candidate will ultimately receive any portion of the payment;
- c) making any payment to low-level government employees in order to facilitate routine governmental actions that involve the exercise of personal judgment or discretion.

7.0 Examples of Prohibited Payments

Some examples of the type of payments which are prohibited under anti-corruption laws are:

- a) "Thank you" or "appreciation" payments made to an employee of a business owned or operated by a government to show appreciation to them for placing an order, or even for considering placement of an order

- b) Payments to influence the award of contracts by a government or by a business owned or operated by a government.
- c) Payments to prevent some actions, such as the cancellation of an existing contract, which would preclude the continuation of normal business relationships.
- d) Payments to induce the issuance of any license or other authorization where discretion is part of the decision to issue the license.
- e) Payments to obtain confidential information about business opportunities or about the activities of competitors.
- f) Payments to a government official to induce the official not to disclose or prosecute activities by Premium Trust Bank that violates local law.
- g) Payments to a government official to dismiss an alleged violation of local law by Premium Trust Bank.
- h) Payments to a government official to obtain or expedite a negotiated agreement with a governmental agency.
- i) Payments to a trade association or similar organization where there is reason to know that some or all the payment will be passed to government officials to influence legislative action.
- j) Payments to influence the rate of taxes which would be levied on Premium Trust Bank's business.
- k) Payments directly to a government official, or through a third party with knowledge that the payment will be given to a government official, for favourable action on legislation, regulations, government purchasing, tax audits, government reimbursement, setting of prices, etc.
- l) Payments to influence the resolution of disputes with the government, e.g., resolution of tax deficiencies, litigation, or avoidance of tax proceedings or assessments, obtaining tax exemptions, obtaining approval of cost recovery items and resolution of disputes over duties payable.

8.0 THIRD PARTIES ENGAGED BY THE BANK

Generally, conducting appropriate due diligence prior to retaining a third party and regularly thereafter, and using the appropriate representations and warranties will prevent violations attributable to Premium Trust Bank through any third-party from occurring.

Bribery and Corruption risk should be assessed while dealing with Third parties.

8.1 Risks Associated with Third Parties

Most anti-bribery and corruption laws impose liability on companies that become involved in direct or indirect bribery. This means that the Bank may incur liability where a third party engaged to represent or provide a service to the Bank makes or receives an improper payment or otherwise engages in improper conduct in the course of their work on behalf of the Bank. This exposure may arise notwithstanding that the payment or conduct in question is prohibited by the Bank.

It is very important, therefore, to take steps to ensure that a third party engaged to represent or provide a service to the Bank does not make or receive any improper payment or otherwise engage in improper conduct in the course of such collaboration with or engagement by the Bank

8.2 Assessing the Bribery and Corruption Risk Presented by Third Parties

To minimise the risk of third parties engaged to represent or provide services to the Bank; making or receiving an improper payment or otherwise engaging in improper conduct in the course of their engagement by or collaboration with the Bank, appropriate due diligence and monitoring activities must be undertaken and observed by members of staff in respect of such third parties.

8.3 Risk Factors

The risk that a third party engaged by or in collaboration with the Bank to represent or provide a service will make or receive an improper payment or otherwise engage in improper conduct in the course of their work on behalf of the Bank will vary depending on several factors; principally the nature of the relationship, the country of operation and the presence of any other indicators of potential bribery and corruption.

8.3.1 Higher Risk Relationships

The following third-party relationships are classified as higher- risks relationships:

- a.** Relationships with any individual, company or other entity which, for a fee or commission, communicates with Public Officials on behalf of the Bank for the purpose of assisting the Bank in relation to obtaining or retaining any relevant licences or regulatory permissions, or in connection with the execution of a transaction or management of an investment;
- b.** Where a Public Official has specifically recommended to the Bank, the engagement of or collaboration with a third party and there exists the possibility of a connection between the Public Official and the third party.

- c. Relationships with any third party in a higher risk country which is engaged to represent or provide services to the Bank
- d. Relationships with any bank or other financial institution or professional adviser (such as lawyers and accountants) domiciled and regulated in a higher risk country
- e. Where any other “Red Flag” is present

If such a relationship arises, it must be referred to the Bank’s Chief Compliance Officer for consideration on specific due diligence and/or other anti-bribery and corruption risk mitigation measures that may be appropriate.

8.3.2 Lower Risk Relationships

The following third-party relationships generally present a lower risk:

- a. With banks and other regulated financial institutions; or
- b. With professional advisers (such as lawyers and accountants) domiciled in low risk countries,

Notwithstanding the above classification of lower risk relationships, where “red flags” are present, the relationship must be referred to the Bank’s Chief Compliance Officer for consideration and implementation of specific due diligence and/or other anti-bribery and corruption risk mitigation measures as may be necessary.

Any “red flag” situation must be resolved before entering into or continuing with the related business relationship or transaction. This may be resolved by conducting Enhanced Due Diligence on the third party involved.

8.3.3 Risk Mitigation Steps – Higher Risk Relationships

In relation to the higher risk relationships identified, it will be necessary to undertake certain risk mitigation steps. These include basic risk mitigation steps - required in all but exceptionally higher risk cases:

- a. conducting due diligence such as carrying out a background check on the third party with guidance from Regulatory Compliance Group before proceeding with the proposed business relationship or transaction in order to verify the third party's reputation and integrity; and
- b. Inserting appropriate contractual provisions in agreements with any third party requiring the third party:
 - i. Not to offer or accept any bribe or make or receive any other improper payment or otherwise breach any applicable anti-bribery and corruption laws;
 - ii. Otherwise to comply as far as is applicable with the Bank’s Anti-Bribery and Corruption Policy;

- iii. To maintain records of all payments and disbursements made on behalf of the Bank and in their representation of the Bank;
- iv. To permit access to relevant books and records for audit/monitoring purposes; and
- v. To provide for a contractual right of termination and indemnification if the third party breaches the above requirements.

c. Termination of relationships with third parties

Premium Trust Bank Plc reserves the right to terminate contractual relationships with any third party engaged by or in collaboration with it in the event of breach of the provisions of this Policy or any applicable anti-bribery and corruption contractual provisions.

9.0 RECORD-KEEPING

The integrity of the Bank's record keeping is essential.

Branches and departments are required to establish procedures for the reporting of all higher risk third party relationships and to establish, maintain and monitor records of such relationships.

Serious instances of bribery and corruption often involve some degree of inaccurate record-keeping. Accurate and proper records and financial reporting must be maintained across the Bank. The Bank's books, records and overall financial reporting must be transparent and accurately reflect each of the underlying transactions.

All expenditure must be supported by documents that accurately and properly describe such expenditure, and the reason for the expenditure must be specifically recorded.

All expense claims must be submitted in accordance with the applicable expense policy and will be subject to managerial review.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal payments.

The falsification of any record or account of the Bank or the submission of any false personal expense statement or claim for reimbursement of a non-business personal expense by any employee of the Bank is prohibited and may lead to disciplinary action, including dismissal for gross misconduct or termination of employment.

10.0 HOW TO RAISE A CONCERN - REPORTING BRIBERY OR CORRUPTION AND SUSPICIOUS ACTIVITY

All employees are responsible for the success of this Policy.

If any employee becomes aware of any actual or suspected breach of this Policy, Premium Trust Bank's Code of Professional Conduct, or any Premium Trust Bank Policy or applicable law or regulation, the employee must raise such concerns as soon as possible. Such reports will be treated confidentially.

The employee may make a good faith report of suspected bribery or corruption or other alleged wrongdoing under the **Premium Trust Bank Whistle blowing Policy**. Concerns can be reported anonymously and confidentially through the Bank's whistleblowing channels by submitting a report of the suspected violation or other complaint or concern. All reports will be treated as strictly confidential. If you have any questions or concerns relating to bribery and corruption, please refer first to this Policy. If you have any questions about the interpretation or application of this Policy, kindly seek guidance from Regulatory and Compliance Group and Legal Group.

11.0 EMPLOYEE PROTECTION

Employees will be protected from retaliation of any kind for refusing to take part in bribery and corruption or for raising a concern or suspicion.

Individuals who refuse to take part in bribery and corruption, or who raise concerns or suspicions or report another's wrongdoing, are sometimes worried about possible repercussions.

Premium Trust Bank encourages openness and will support anyone who refuses to take part in bribery and corruption or who raises a concern or suspicion or reports wrongdoing in good faith. The Bank is committed to ensuring no one suffers any detrimental treatment (such as dismissal, any other disciplinary action, threats or other unfavourable treatment) as a result of taking such steps. If you believe that you have suffered any such treatment, do inform Conduct and Compliance Division immediately.

12.0 COMMUNICATION AND TRAINING

We are committed to ensuring that this Policy and our associated anti-bribery and corruption procedures are embedded and understood throughout the Bank, through internal and external communication and training.

Appropriate training will form part of the induction process provided on joining the Bank. Appropriate and regular training on how to implement and comply with this Policy will be provided to existing employees. Training attendance records will be kept, and training will be regularly monitored and evaluated.

The training offered will be proportionate to the risks of bribery and corruption that the Bank faces. Training will be of a higher level for those employees exposed to a higher risk of bribery and corruption.

The Bank's anti-bribery and corruption commitments shall be communicated to all third parties engaged by and in collaboration with the Bank at the outset of the business relationship and as necessary thereafter. Such third parties will be required to attest that they will comply with the anti-bribery and corruption commitments. Appropriate training on how to implement and comply with this Policy may, as necessary, be provided to relevant employees of third parties.

Management at all levels are responsible for ensuring that relevant employees who directly or indirectly report to them are made aware of this Policy and are given appropriate and regular training on it. It is also the responsibility of Directors and Senior management to lead by example and to demonstrate the highest standards of integrity in carrying out their duties on behalf of the Bank.

13.0 MONITORING AND REVIEW

This Policy will be regularly monitored and reviewed for suitability and adequacy.

Executive Management shall undertake periodic reviews of the Anti- Bribery and Corruption compliance programme and measures, designed to evaluate and improve effectiveness in preventing and detecting bribery and corruption in line with relevant developments in the field and evolving international and industry standards. Such reviews may be undertaken internally or by an independent third party.

The Bank's Regulatory and Financial Crimes Compliance Group together with relevant stakeholders of the Bank shall monitor the level of compliance to this Policy.

14.0 PENALTIES

Criminal penalties for violation of anti-bribery and anti-corruption laws can be severe.

The penalties per violation of these anti-bribery provisions include criminal fines for both companies and individuals in millions of naira and can be as much as twice the profit on any business obtained. Individuals can be imprisoned for up to five years per violation.

Any employee who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment.

Any third-party engaged by or in collaboration with the Bank that violates the terms of this Policy, knows of but fails to notify the Bank of any potential violations of this Policy, shall have their contracts re-evaluated or terminated.

APPENDIX A

Potential Risk Scenarios - "Red Flags"

The following is a non-exhaustive list of possible "Red Flags" that may arise while working for the Bank which may raise bribery and corruption concerns:

- i. You are aware that a third party engages in, or has been accused of engaging in, improper conduct or has a reputation for paying bribes or requiring that bribes are paid to them;
- ii. A third party lacks apparent qualifications, experience or resources;
- iii. A third party demands gifts or hospitality before commencing or continuing contractual negotiations or the provision of services or offers you an unusually generous gift such as cash or lavish hospitality;
- iv. A third party is based in a higher risk country
- v. A third-party refuse to provide (or provides insufficient, false, or inconsistent) information in response to due diligence questions;
- vi. A third party requests the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or a shell company serves as a middleman (especially when domiciled in a secrecy haven);
- vii. There are signs that the third party is not acting on his own behalf, but is trying to conceal the true beneficial owner's identity;
- viii. A third party has a reputation for having a "special relationship" with a government, political party or other Public Official or has been specifically requested by a Public Official;
- ix. Money or property is passed through a third party (such as a consultant or representative) to a Public Official;
- x. A third-party request that a transaction is structured to evade normal record-keeping or reporting requirements;
- xi. A third-party refuse to sign a commission or fee agreement or insists on the use of a side-letter relating to payment of funds;
- xii. A third party requests an unusually large or disproportionate commission or other fee or an unexpected additional fee or commission to "facilitate" a service;
- xiii. A third-party requests payment in cash
- xiv. A third party requests that he is not paid directly (for example by wire transfer to an account in his name at his principal place of business) but that payment is made through another party that has no contractual relationship with the Bank or that payment is made to a geographic location different from where he resides or conducts business particularly a higher risk country
- xv. A third-party refuse to abide by this Policy or does not demonstrate that it has adequate internal anti-bribery and corruption policies and procedures in place.

APPENDIX B

Higher Risk Countries

For the purposes of this Policy, higher risk countries are those with a score below 50 in the Transparency International Corruption Perception Index ("CPI"). The current CPI is available at: <http://cpi.transparency.org/>

The CPI measures the degree to which Public Sector corruption is perceived to exist in 180 countries and territories around the world. It uses a scale of 0 to 100, where **0 is highly corrupt** and **100 is very clean**. The CPI score and rank time series from 2017 – 2019 shows that the vast majority of the 180 countries and territories assessed score 50 in 2019 CPI, with an average score of just 43. Details are shown in the table below;

S/N	Country	CPI score 2019	Rank 2019	CPI score 2018	Rank 2018	CPI score 2017	Rank 2017
1	New Zealand	87	1	87	2	89	1
2	Denmark	87	1	88	1	88	2
3	Finland	86	3	85	3	85	3
4	Switzerland	85	4	85	3	85	3
5	Singapore	85	4	85	3	84	6
6	Sweden	85	4	85	3	84	6
7	Norway	84	7	84	7	85	3
8	Netherlands	82	8	82	8	82	8
9	Luxembourg	80	9	81	9	82	8
10	Germany	80	9	80	11	81	12
11	Iceland	78	11	76	14	77	13
12	Canada	77	12	81	9	82	8
13	United Kingdom	77	12	80	11	82	8
14	Australia	77	12	77	13	77	13
15	Austria	77	12	76	14	75	16
16	Hong Kong	76	16	76	14	77	13
17	Belgium	75	17	75	17	75	16
18	Ireland	74	18	73	18	74	19
19	Estonia	74	18	73	18	71	21
20	Japan	73	20	73	18	73	20
21	United Arab Emirates	71	21	70	23	71	21
22	Uruguay	71	21	70	23	70	23
23	United States of America	69	23	71	22	75	16
24	France	69	23	72	21	70	23
25	Bhutan	68	25	68	25	67	26
26	Chile	67	26	67	27	67	26
27	Seychelles	66	27	66	28	60	36
28	Taiwan	65	28	63	31	63	29
29	Bahamas	64	29	65	29	65	28
30	Barbados	62	30	68	25	68	25
31	Portugal	62	30	64	30	63	29
32	Qatar	62	30	62	33	63	29
33	Spain	62	30	58	41	57	42
34	Botswana	61	34	61	34	61	34
35	Brunei Darussalam	60	35	63	31	62	32
36	Israel	60	35	61	34	62	32

S/N	Country	CPI score 2019	Rank 2019	CPI score 2018	Rank 2018	CPI score 2017	Rank 2017
37	Slovenia	60	35	60	36	61	34
38	Lithuania	60	35	59	38	59	38
39	Saint Vincent and the Grenadines	59	39	58	41	58	40
40	Korea, South	59	39	57	45	54	51
41	Poland	58	41	60	36	60	36
42	Cyprus	58	41	59	38	57	42
43	Cabo Verde	58	41	57	45	55	48
44	Costa Rica	56	44	56	48	59	38
45	Latvia	56	44	58	41	58	40
46	Czech Republic	56	44	59	38	57	42
47	Georgia	56	44	58	41	56	46
48	Dominica	55	48	57	45	57	42
49	Saint Lucia	55	48	55	50	55	48
50	Malta	54	50	54	51	56	46
51	Rwanda	53	51	56	48	55	48
52	Grenada	53	51	52	53	52	52
53	Italy	53	51	52	53	50	54
54	Saudi Arabia	53	51	49	58	49	57
55	Malaysia	53	51	47	61	47	62
56	Namibia	52	56	53	52	51	53
57	Mauritius	52	56	51	56	50	54
58	Oman	52	56	52	53	44	68
59	Slovakia	50	59	50	57	50	54
60	Jordan	48	60	49	58	48	59
61	Greece	48	60	45	67	48	59
62	Cuba	48	60	47	61	47	62
63	Croatia	47	63	48	60	49	57
64	Sao Tome and Principe	46	64	46	64	46	64
65	Vanuatu	46	64	46	64	43	71
66	Montenegro	45	66	45	67	46	64
67	Senegal	45	66	45	67	45	66
68	Belarus	45	66	44	70	44	68
69	Argentina	45	66	40	85	39	85
70	Romania	44	70	47	61	48	59
71	Hungary	44	70	46	64	45	66
72	South Africa	44	70	43	73	43	71
73	Suriname	44	70	43	73	41	77
74	Jamaica	43	74	44	70	44	68
75	Bulgaria	43	74	42	77	43	71
76	Tunisia	43	74	43	73	42	74
77	Solomon Islands	42	77	44	70	39	85
78	Bahrain	42	77	36	99	36	103
79	Armenia	42	77	35	105	35	107
80	China	41	80	39	87	41	77
81	Morocco	41	80	43	73	40	81
82	Ghana	41	80	41	78	40	81
83	India	41	80	41	78	40	81
84	Benin	41	80	40	85	39	85

S/N	Country	CPI score 2019	Rank 2019	CPI score 2018	Rank 2018	CPI score 2017	Rank 2017
85	Burkina Faso	40	85	41	78	42	74
86	Lesotho	40	85	41	78	42	74
87	Trinidad and Tobago	40	85	41	78	41	77
88	Kuwait	40	85	41	78	39	85
89	Guyana	40	85	37	93	38	91
90	Indonesia	40	85	38	89	37	96
91	Serbia	39	91	39	87	41	77
92	Turkey	39	91	41	78	40	81
93	Sri Lanka	38	93	38	89	38	91
94	Timor-Leste	38	93	35	105	38	91
95	Ecuador	38	93	34	114	32	117
96	Colombia	37	96	36	99	37	96
97	Tanzania	37	96	36	99	36	103
98	Ethiopia	37	96	34	114	35	107
99	Vietnam	37	96	33	117	35	107
100	Gambia	37	96	37	93	30	130
101	Kosovo	36	101	37	93	39	85
102	Bosnia and Herzegovina	36	101	38	89	38	91
103	Panama	36	101	37	93	37	96
104	Thailand	36	101	36	99	37	96
105	Peru	36	101	35	105	37	96
106	Albania	35	106	36	99	38	91
107	Brazil	35	106	35	105	37	96
108	Mongolia	35	106	37	93	36	103
109	Cote d'Ivoire	35	106	35	105	36	103
110	North Macedonia	35	106	37	93	35	107
111	Algeria	35	106	35	105	33	112
112	Egypt	35	106	35	105	32	117
113	Eswatini	34	113	38	89	39	85
114	Zambia	34	113	35	105	37	96
115	Philippines	34	113	36	99	34	111
116	El Salvador	34	113	35	105	33	112
117	Kazakhstan	34	113	31	124	31	122
118	Nepal	34	113	31	124	31	122
119	Sierra Leone	33	119	30	129	30	130
120	Niger	32	120	34	114	33	112
121	Pakistan	32	120	33	117	32	117
122	Moldova	32	120	33	117	31	122
123	Bolivia	31	123	29	132	33	112
124	Gabon	31	123	31	124	32	117
125	Malawi	31	123	32	120	31	122
126	Djibouti	30	126	31	124	31	122
127	Azerbaijan	30	126	25	152	31	122
128	Ukraine	30	126	32	120	30	130
129	Kyrgyzstan	30	126	29	132	29	135
130	Maldives	29	130	31	124	33	112
131	Togo	29	130	30	129	32	117
132	Mali	29	130	32	120	31	122

S/N	Country	CPI score 2019	Rank 2019	CPI score 2018	Rank 2018	CPI score 2017	Rank 2017
133	Myanmar	29	130	29	132	30	130
134	Laos	29	130	29	132	29	135
135	Mexico	29	130	28	138	29	135
136	Guinea	29	130	28	138	27	148
137	Liberia	28	137	32	120	31	122
138	Dominican Republic	28	137	30	129	29	135
139	Paraguay	28	137	29	132	29	135
140	Papua New Guinea	28	137	28	138	29	135
141	Russia	28	137	28	138	29	135
142	Lebanon	28	137	28	138	28	143
143	Kenya	28	137	27	144	28	143
144	Mauritania	28	137	27	144	28	143
145	Uganda	28	137	26	149	26	151
146	Iran	26	146	28	138	30	130
147	Honduras	26	146	29	132	29	135
148	Guatemala	26	146	27	144	28	143
149	Bangladesh	26	146	26	149	28	143
150	Nigeria	26	146	27	144	27	148
151	Mozambique	26	146	23	158	25	153
152	Angola	26	146	19	165	19	167
153	Comoros	25	153	27	144	27	148
154	Cameroon	25	153	25	152	25	153
155	Central African Republic	25	153	26	149	23	156
156	Uzbekistan	25	153	23	158	22	157
157	Tajikistan	25	153	25	152	21	161
158	Madagascar	24	158	25	152	24	155
159	Zimbabwe	24	158	22	160	22	157
160	Eritrea	23	160	24	157	20	165
161	Nicaragua	22	161	25	152	26	151
162	Cambodia	20	162	20	161	21	161
163	Chad	20	162	19	165	20	165
164	Iraq	20	162	18	168	18	169
165	Burundi	19	165	17	170	22	157
166	Congo	19	165	19	165	21	161
167	Turkmenistan	19	165	20	161	19	167
168	Haiti	18	168	20	161	22	157
169	Democratic Republic of the Congo	18	168	20	161	21	161
170	Libya	18	168	17	170	17	171
171	Guinea Bissau	18	168	16	172	17	171
172	Korea, North	17	172	14	176	17	171
173	Venezuela	16	173	18	168	18	169
174	Equatorial Guinea	16	173	16	172	17	171
175	Sudan	16	173	16	172	16	175
176	Afghanistan	16	173	16	172	15	177
177	Yemen	15	177	14	176	16	175
178	Syria	13	178	13	178	14	178
179	South Sudan	12	179	13	178	12	179
180	Somalia	9	180	10	180	9	180

APPENDIX C

Applicable Laws

The Bank's Global Anti-Bribery and Corruption Policy is designed to ensure compliance with the laws in Nigeria and countries in which the Bank's correspondent Banks operate. These include, the Nigerian Corrupt Practices and other Related Offences Act, the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act ("FCPA"). All of these apply to certain aspects of the Bank's business and to employees. More details on these anti-bribery and corruption laws is provided below.

The Corrupt Practices and other Related Offences Act

Generally, prohibits the various perceived acts of corrupt practices arising from interactions or transactions involving public/government officers and the general public or private individuals. The Act defines corruption to include bribery, fraud and other related offences while persons are defined to include natural persons, juristic person or anybody or persons corporate or incorporate.

The Act equally seeks to curb corrupt practices in private business transactions and other personal relationship among individuals and persons.

UK Bribery Act 2010

The UK's Bribery Act (in force from July 2010) is far-reaching legislation which creates broadly scoped offences in relation to both

- (1) Public and private sector corruption and
- (2) The giving and receiving of bribes. The Act applies to acts committed anywhere in the world (i.e. including the UK, the US, and all other countries) by British citizens, UK residents, UK companies, and organisations with even a very limited UK connection, such as doing business in the UK.

Bribery Offences (giving or receiving bribes)

It is illegal to offer, promise or give an advantage to someone:

- With the intention that the advantage induces or rewards that person for behaving "improperly", or
- Knowing or believing that the recipient's acceptance of the advantage would constitute "improper" behaviour.
- Impropriety is judged by reference to the expectations of a reasonable person in the UK.
- This offence applies both in the public and private sectors and criminalises, for example:
- Providing gifts to Public Officials for the purpose of expediting the award of licences, visas, or similar documentation;
- Accepting improper or inappropriate gifts, hospitality and other promotional expenses offered by the Bank's suppliers with a view to awarding business to those suppliers;
- Providing someone with a gift, hospitality or other promotional expense when it is known that they are not permitted to accept it under local law or their employer's rules (as the receipt is therefore "improper").

It does not matter if the advantage is offered or paid directly or indirectly, i.e. using

a third party such as an agent or intermediary.