

Anti-Bribery and Anti-Corruption Policy.

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1. Introduction

“Group” or “Kina Bank” refer to all operations, branches, subsidiary companies and joint ventures where Kina Securities Limited holds the controlling interest.

1.1 Policy Statement

Kina Bank is committed to conducting its business dealings and relationships in a fair, honest and ethical manner. Kina Bank recognises that acts of bribery and corruption are detrimental to the growth and prosperity of individuals, organisations and overall, the communities that we serve. As a business, Kina Bank is very mindful of the consequences of bribery and corruption which may result in both financial and reputational loss and imposition of regulatory, including criminal sanctions. Kina Bank has a “zero tolerance” approach to bribery and corruption and is committed to ensuring that it fully complies with relevant internationally accepted best practice, sanctions and domestic laws in the jurisdictions where it operates.

This Anti-Bribery and Anti-Corruption Policy (the Policy) provides clarity of expectations, which helps to reinforce and strengthen the understanding of our responsibilities as well as those with whom we engage. It also provides guidance in dealing with incidents or suspected incidents of bribery and corruption, should they occur. Having such a policy in place significantly reduces the risk of non-compliance with relevant regulatory obligations and implements effective systems to counter bribery and corruption.

The Policy forms a part of Kina Bank’s Compliance Risk Management Strategy and Framework (CRMSF) and complements Kina Bank’s other related policies, in particular, the Code of Ethics and Business Conduct, Conflict of Interests Policy, Gift and Entertainment Policy and the Protected Disclosure (Whistle blower) Policy.

This Policy harmonises with Kina Bank’s Core Values that emphasise principles of fairness, imagination, reflection, togetherness and honesty in our business dealings and relationships with both our internal and external stakeholders.

1.2 Application

This Policy applies to all directors, employees and the relevant third parties who have a direct or indirect business relationship with Kina Bank.

Kina Bank expects all directors, employees and any third party to act with integrity and to undertake their business devoid of bribery and corruption.

In addition to the above, Kina Bank will investigate reported allegations of bribery, corruption and abuse of position for personal gain, involving, or in any way connected to it. If necessary, appropriate action will be taken as a result of such investigations, including

termination employment or of relationships with third parties and submitting the necessary reports to relevant government authorities or regulators.



2. Responsibilities

Kina Bank's Board has overall responsibility for the ethical conduct of its directors, executive management and all employees in all relationships and business dealings. It is responsible for ensuring that Kina Bank complies with international sanctions, standards on bribery and corruption whilst also meeting the domestic obligations under relevant domestic laws and regulations of the jurisdictions that Kina Bank operates in.

2.1 Specific Responsibilities

- The Board will oversight performance and compliance with this Policy.
- The executive management of Kina Bank are accountable for establishing related policies and processes and ensuring that they are observed and for providing regular reports to the Board. The executive management is also accountable for assessing and reviewing compliance with this policy biannually.
- All Board and executive management directives will be implemented through the Group Risk Business Unit (Risk Unit). The Risk Unit will be expected to take the lead by providing guidance, advice, and direction to promote compliance with the policy, ensure effective reporting, escalation, and resolution of bribery and corruption compliance issues.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy.
- All Board Directors, Senior Management and Staff are:
 - required to familiarise themselves with the requirements of this policy;
 - prohibited from accepting, offering, promising, or paying a bribe of any kind;
 - prohibited from offering gifts, entertainment or hospitality that they know or believe could be deemed **unethical**;
 - prohibited from accepting or soliciting a bribe of any kind (and must report and register any such offers); and
 - required to report any suspicion of corruption or bribery to the relevant Business Unit Manager and Chief Risk Officer. Alternatively the staff can follow the procedures set in Kina Bank's *Protected Disclosure (Whistle Blower) Policy*.
- Senior Management will implement processes that enable effective oversight and monitoring of relevant third parties compliance with this policy. Primarily this will be by ensuring Management and the requirements of this policy are communicated to those parties and business dealings are conducted in a fair, ethical and professional manner at all times.

3. Bribery and Corruption

3.1 Definitions

- **Bribery** is the offering, giving, soliciting or receiving of 'something of value' to induce or influence a person's behaviour to obtain a business advantage; or to gain regulatory or personal advantage; or to reward unethical and improper conduct. It involves dishonestly persuading someone to influence or gain favour by giving him or her money, gifts or other forms of inducement.
- **Corruption** is any unlawful or improper conduct that seeks to gain a personal gain or business advantage through the exploitation of an individual's position or the abuse of entrusted power. Corruption is simply a dishonest or illegal behaviour, especially by people in positions of power or influence.
- **Conflict of Interest** arises when the various interests, duties or commitments that a person may have with family, friends, work, voluntary work or political interests, come into conflict (or are very likely to) with their employment or other roles of responsibility¹. Such interests do not necessarily involve improper or corrupt behaviour, although they can lead to such behaviour.
- **Something of Value** includes money, services or other valuables which may also include gifts, entertainment, travel expenses or expensive goods; or any other tangible or intangible thing that has value to the recipient.
- **Employee** includes all individuals in the employ of Kina Bank and includes executive managers, permanent employees, trainees or interns and temporary staff.
- **Public Official** means employees of any government or other public body, at any level, employees of state owned or controlled enterprises, politicians and political parties including their advisors, representatives and employees.
- **Third Party** means any individual or entity who is a customer, potential customer or is engaged by Kina Bank to act on its behalf such as service providers, suppliers, contractors, intermediaries, agents, consultants, associates, joint venture partners, sales representatives and business partners.

3.2 Forms of Bribery and Corruption

Bribery and Corruption can take various forms, for example:

- direct cash payments money or cash equivalent
- facilitation payments (grease payments)
- kickbacks
- gifts, hospitality and entertainment
- donations and sponsorships
- political contributions
- charitable contributions
- inflated or excessive commissions

¹ As defined by Transparency International

- false or inflated invoicing or product pricing
- outsourcing, procurement and service contracts
- exchange of favours (including phony jobs or “consulting” relationships, nepotism)
- extortion
- unwarranted allowances or expenses
- embezzlement
- fraud

4. Requirements of the Policy

4.1 General Prohibition

All forms of bribery and corruption are prohibited. The giving, authorising, approval, promise, acceptance or soliciting of any form of bribe or corrupt payment is prohibited in Kina Bank's dealings in both the private and public sectors. A violation of this Policy can occur even if the payment fails to achieve its intended purpose.

4.2 Procurement, Outsourcing and Contracting of Services

It is unacceptable for directors or employees to solicit or accept cash payments or any form of bribe from bidders and contractors to manipulate procurement processes to favour particular bidders including disguising the basis of decisions to award contracts.

All procurements, contracting and outsourcing of services must be consistent with guidelines set out under Kina Bank's Vendor Management Framework, Outsourcing Policy, Procurement Policy and all related processes or procedures. Any breaches or suspected breaches of these policies, processes or procedures involving suspicions of bribery or corruption concerning any service performed by third parties must be reported immediately to the Chief Risk Officer, and/or the relevant Executive General Manager.

The guidelines under the Protected Disclosure (Whistle Blower) Policy may also be followed in reporting on bribery and corruption issues involved in the procuring, outsourcing and contracting of services with third parties.

4.3 Third Parties

All third parties should be made aware of this Policy and Kina Bank's expectations for them to comply with it. It is prohibited for directors and employees to use third parties to engage in activities that are prohibited under this Policy.

Prior to engaging in any third party, appropriate risk-based due diligence must be undertaken on the third party to assess their integrity and any associated corruption or bribery risk of their engagement with Kina Bank. This should include background checks, document verification or interviews. In addition, all third parties should declare any personal interest the third party may have in connection to any of Kina Bank's decision or matter that the third party is involved in.

The outcome of such due diligence including mitigating measures and approvals should be made available to the relevant functions of the Kina Bank.

All arrangements with any third party should be subject to clear contractual terms including specific terms requiring the third party to comply with this Policy and the minimum best practice standards of bribery and corruption.

4.4 Gifts, Entertainment and Hospitality

This Policy does not prohibit normal and appropriate hospitality, gifts or entertainment given and received, provided that this is done in accordance with Kina Bank's Gift and Entertainment Policy. All hospitality, gifts or entertainment should be for genuine purpose and reasonable, given in the ordinary course of business.

4.4.1 Exceptions to Accepting Gifts, Entertainment and Hospitality

Normal and appropriate hospitality, entertainment and gifts would include where the hospitality, entertainment or gift:

- is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- is given in the name of Kina Bank rather than individuals;
- complies with applicable laws and Kina Bank's internal policies;
- does not include cash or a cash equivalent (such as gift certificates or vouchers);
- is appropriate for the occasion or under the circumstances.
- takes into account the reason for giving or receiving of the gift and nature of the business relationship
- is recorded or documented properly in the relevant gift registers;
- is proportionate and of reasonable value;
- is given openly, not secretly;
- is not a conflict of interest that will result in affecting Kina Bank's interests, its shareholders, customers or other stakeholders; and
- is not offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval from Senior Management.

4.4.2 When a Gift, Entertainment or Hospitality is Not Acceptable

There are however, situations where offering and accepting of gifts and hospitality are not acceptable. It is NOT acceptable to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official or a third party to facilitate or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- accept lavish or expensive gifts or hospitality that may create the impression that a favourable business advantage maybe obtained or received;
- accept entertainment that is inappropriate in nature;
- threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this Policy; or

- engage in any activity that might lead to a breach of this Policy.

4.4.3 Registration and Declaration of Interests and Gifts

Maintaining an open or transparent culture in a work place helps in preventing acts of bribery and corruption.

Employees at many levels will have an opportunity to influence the choice of third parties. Employees must ensure that the selection of suppliers and contractors is always determined in a way that reflects the best interests of Kina Bank, and not personal or family interest. It is therefore important that, established policies and guidelines must be followed in all business dealings that includes undertaking proper due diligence and complying with the requirements of the Vendor Management Framework, Outsourcing Policy and the Procurement Policy.

Furthermore, as required also under the Conflict of Interest Policy, Kina Bank must maintain processes for its directors and staff to disclose any conflict of interest and to record gifts and benefits received during their interaction with clients and third parties.

The following processes will be put in place:

- Disclosure of Interest Form – this Form (Appendix A) must be completed by all Directors and employees in a conflict of interest or potential conflict of interest situation as required under the Conflict of Interest Policy;
- Gift and Entertainment Form – this Form (Appendix B) must be completed by all employees and directors of Kina Bank as required under the Gift and Entertainment Policy;
- Disclosure of Interest Register – the Company Secretary will maintain a register for the directors whilst the Chief Risk Officer will maintain an up-to –date register of all employee interests as also required under the Conflict of Interest Policy; and
- Gift and Entertainment Register – the Company Secretary will maintain a register for the directors whilst the Chief Compliance Officer will maintain a register on behalf of the Chief Risk Officer for employees as required under the Gift and Entertainment Policy.

The Chief Compliance Officer will have oversight of these registers and undertake annual reviews in consultation with the respective BU Managers. The gift and disclosure of interest registers will be consistent with the requirements of Kina Bank’s Code of Ethics and Business Conduct and are vital for the control processes used to support the implementation of both the Conflict of Interest and the Anti-Bribery and Anti- Corruption policies.

Appendices A, B and C, provide examples of the Disclosure of Interest and Gifts and Entertainment Forms and the registers that can be maintained for disclosing, recording gifts and benefits and conflict of interest concerning Directors and employees.

4.5 Facilitation and Kickbacks

Kina Bank does not make and will not accept facilitation payments or kickbacks of any kind. Facilitation payments and kickbacks are bribes and prohibited by this Policy.



Facilitation payments are unofficial payments made to secure or expedite a routine action or process. For instance, it may involve accepting a payment from a Kina Bank customer to process a cheque, loan or any transaction.

If a third party requests a payment to be made on behalf of Kina Bank during a business dealing, it is important to ask and confirm what the payment is for, whether or not the amount requested is proportionate to the goods and services provided, and whether the payment is appropriate to the ordinary course of business, and furthermore, a receipt for the payment must be provided.

Kickbacks are typically payments made in return for a business favour or advantage. All directors and employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by a director or the employee.

Any request, concerns, suspicions or issues regarding such payments must be reported to the respective BU and subsidiary managers as well as the Chief Risk Officer in the first instance. Alternatively, the guidelines of the Protected Disclosure (Whistle Blower) Policy may also be used to report on such payments.

4.6 Donations, Charitable and Sponsorship Activities

As a responsible corporate citizen, Kina Bank engages with and supports charity and community initiatives aimed at improving and sustaining the lives of people and communities in which we operate. Donations, sponsorship and charitable contributions are acceptable whether these are in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that these activities are not used as a scheme to conceal bribery.

Any payments for charities, donations or sponsorship must;

- be made to a legitimate or the relevant entity;
- not be given for business advantage or influence a business outcome.

All donations made on behalf of the Kina Bank must be approved in advance by the Chief Executive Officer (CEO) and/or the Executive Committee and recorded.

4.7 Public Officials

Whenever Kina Bank directors, employees or anyone engaged to conduct business on Kina Bank's behalf with government officials, this should be done with the highest ethical standards and must comply with all applicable law.

Facilitation payments for public officials including secret payments and payments for or exchange of valuable items through third parties are prohibited.

Gifts, entertainment or hospitality given to public officials must not create the perception that these are being used to influence decisions or government administrative processes.

4.8 Record Keeping

In line with the Statute of Limitation and Kina Bank's internal policies, employees must keep financial records and the Group must have internal controls in place which will evidence the business reason for making payments to third parties. The following actions must be taken with recording hospitality and gifts:

- records of hospitality and gifts offered and received must be maintained in a register, (as referred to in Section 5.4.3 above) which will also be subject to management review; This includes maintaining copies of receipts and invoices to verify payments;
- all expenses claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with Kina Bank's finance related policies and specifically record the reason for the expenditure. Kina Bank's Finance Department is responsible for these records.

All Directors, Senior Management and staff must at all times maintain proper records and submit full copies of payments (funds spent on gifts and entertainment) made (including invoices and receipts) for reconciliation and accounting purposes. Any detection of suspicious payments and misuse of company resources must be brought to the attention of the CEO and/or the Chief Risk Officer as soon as possible for deliberation and possible actions.

4.9 List of Red Flags for Corrupt Practices

This list is not intended to be exhaustive and is for illustrative purposes only. Kina Bank should be on alert for other indicators that may raise a suspicion of corrupt or improper activity.

The following is a list of red flags that may indicate the possible existence of corrupt practices and should be kept in mind by all those subject to this Policy:

- a) Payments of unusually high commissions or fees. For example, unusually large commission payments to a third party where the third party does not appear to have provided significant services;
- b) Evidence of expensive or unreasonable gifts, entertainment or hospitality expenses not reasonably related to a business purpose;
- c) Cash payments made without a paper trail or without compliance with normal internal controls. For instance, payments made without complete receipts or invoices.
- d) Unusual cash payments to an employee or director for which there is little or no proper supporting documentation;
- e) Refusal to provide information or inadequate information is provided during due diligence checks, for example, incomplete or inconsistent information is provided about the qualification, fitness, experience or financial stability of a third party;
- f) Payments made through third parties or to offshore accounts;
- g) Private meetings requested by public contractors or companies hoping to tender for contracts;
- h) Not following Kina Bank's policies or procedures – abusing the decision-making process;
- i) Unexplained preferences for certain contractors, suppliers or service providers;

- j) Invoices rendered or paid in excess of contractual amounts given the service stated to have been provided or appears to be non-standard or customized;
- k) Engagement of a third party in a location where bribery or fraud is a high risk;
- l) Engagement of a third party in an industry where there are high incidences of corruption or fraud;
- m) Contractual terms agreed in writing or there are no evidence of a written agreement
- n) Where a third party;
 - has a history of or has been accused of engaging in bribes or improper business practices;
 - refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
 - requires an unreasonably additional fees or commission to facilitate a service;
 - requests favours for the provision of employment or for some other advantage to a friend or relative;
 - requests that payment to be made to a country or geographic location different from where the third party resides or conducts business; and
 - requests for a political contribution or donation to the party or charity of their choice before agreeing to undertake a business relationship

5. Interaction with Other Kina Bank Policies

This Policy is an integral part of Kina Bank's suite of governance policies. Relevant related policies include but are not limited to:

- Anti-Money Laundering and Counter Terrorism Financing Requirements
- Breach Management Policy
- Code of Ethics and Business Conduct
- Complaints Handling Procedures
- Complaints Policy
- Compliance Policy
- Compliance Risk Management Strategy and Framework
- Conflict of Interest Policy
- Customer Acceptance and Customer Retention Policy
- Financial Crime Compliance Governance Policy
- Financial Crime Compliance Programme
- Gift and Disclosure Procedures
- Gift and Entertainment Policy
- Human Resources Policies and Procedures Manual
- Incident Management Policy
- Outsourcing Policy
- Procurement Policy
- Protected Disclosure (Whistle Blower) Policy
- Sanctions and Sensitive Countries Policy
- Vendor Management Framework

6. Implementation, Training and Communication

6.1 Responsibility

The Chief Compliance Officer is responsible for the effective implementation of this policy. He/ She must work in close consultation with all Business Unit Managers to ensure that the requirements of the policy are communicated, appropriate training is carried out, reviews and updates are done and reports provided to the Board and Senior Management.

6.2 Monitoring and Review

Monitoring is a proactive approach by Kina Bank to identify procedural or training weaknesses in an effort to prevent regulatory and policy breaches. As part of the quarterly compliance updates done by the Risk Business Unit, it will also require updates from the Company Secretary and the People and Culture business function as to any information declared by employees and the directors. The Chief Risk Officer will review the information to determine any information or issue that needs to be brought to the attention of the Executive Management and the Board.

The Policy will be reviewed annually to ensure that:

- disclosures of interests, gifts and hospitality meet the requirements of this Policy and other relevant Kina Bank policies;
- third party service provider operations are consistent with the Policy;
- proper document filing and retention procedures are being maintained through administration of the registers;
- Corrective measures have been taken to address reported incidents of bribery and corruption.

This Policy will also be reviewed from time to time to take account of changes to legislation, regulatory developments or significant organizational changes such as changes in Kina Bank's business operations, products, or services. Modifications that are necessary should be made expeditiously to minimize compliance risk, and applicable personnel in all affected operating units should be advised of the changes once these changes are approved by the Board.

6.3 Training and Communication

The Chief Risk Officer will ensure that this Policy is communicated to all board members and employees at least once per year. He/ She will also ensure that appropriate and regular training is carried out for staff. Consideration of the appropriate level of training should also be given to those members of staff who are to be involved in higher-risk activities, either specifically or as part of other training. Staff dealing directly with customers at the branches, procurement, finance, internal audit, information technology, AML and Compliance (not an exhaustive list) may be categorised as those involved in higher risk activities and appropriate training which may be more frequent and tailored should be organised for them.

7. Policy Breaches

7.1 Breaches

All cases of alleged/suspected bribery and corruption will be investigated and followed up by the application of all available remedies. Employees who commit an act of bribery or corruption, violate Kina Bank's Code Ethics and Business Conduct and breach this Policy, will be subject to disciplinary action, up to and including termination with cause.

Issues or concerns of bribery and corruption raised by staff will be taken seriously and investigated. This will be done in accordance with the requirements of the Whistle Blower Policy as appropriate to protect the identity of staff.

No employee will be adversely affected or disciplined by Kina Bank because the employee refuses to carry out a directive which violates any applicable laws or this Policy. However, anyone who files a complaint with the intention of spreading lies or to threaten or damage another person's reputation, will be the subject of disciplinary action.

Once an issue on bribery and corruption is reported, the respective Business Unit Manager and the Senior Fraud Investigation Officer will investigate the matter and recommend corrective or disciplinary actions to be taken. The disciplinary actions applied must be consistent with standing Kina Bank HR disciplinary policies.

7.2 Protection

Employees who refuse to take part in bribery or corruption, or report in good faith under this Policy their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future will be protected from detrimental treatment or retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Appendix A

Managing Conflict of Interest

Disclosure of Interests Form

I declare that, to the best of my knowledge, I am unaware of any circumstances that could be construed as providing any possible conflict of interest regarding my employment with Kina Bank and the activities of another business (shown below) of which I have a position of influence, and any such situation will be brought to the immediate prior attention of Kina Bank in future transactions in which I am involved or otherwise aware.

1. Name of Company/Business(s) Relationship (e.g. Owner, Director², Adviser, Sales Representative), giving details of interest or position of influence in the business.

2. Details of possible activity with Kina Bank.

3. Name of persons employed with Kina Bank with whom you have a personal relationship with and nature of the relationship (e.g. Spouse, Sibling, Parent, Child)

4. Either

I declare that as a consequence of my disclosure of interest in the above mentioned, I have a potential conflict of interest in light of my employment with Kina Bank (tick if appropriate).

Or

I declare that, although no conflict of currently interest exists, there may be a potential conflict of interest in the future with my employment at Kina Bank and the activity described in (2) and or the relationship disclosed to in (3)

5. I further declare that I will immediately inform Kina Bank of any changes in circumstances regarding this action.

Signature

Date

Print Name

Business Unit

² Approval must be obtained from the CEO and/or CRO for positions of Director, Secretary, Public Officer or Executive Officer of a private or public company or Trusts



**CERTIFICATION BY EXECUTIVE GENERAL
MANAGER**

I have noted this business interest's declaration. I am satisfied that no conflict of interest will occur, and I authorise the dealing described below by Kina Bank, subject to any conditions listed below (if applicable):

1. AUTHORISED DEALING

2. CONDITIONS

- a) The employee will take no part in Kina Bank's decision making process regarding the business interest, and or regarding the employee with whom a personal relationship exists.
- b) The employee will not utilise any of Kina Bank's facilities or property related to this business interest.

Signature

Date

Print name

Business Unit

**APPROVAL FOR POSITION OF
DIRECTOR, SECRETARY, PUBLIC OFFICER OR EXECUTIVE OFFICER OF A
PRIVATE OR PUBLIC COMPANY OR A TRUST**

I approve _____ to hold the position of _____ with the
company, _____ provided that if any potential or
actual conflict of interest should arise the employee withdraws from any Kina Bank
or Company dealing with the matter concerned.

Signature

Date

Print name

Business Unit

Chief Executive Officer / Chief Risk Officer



Appendix B

Disclosure of Interest Register

Name of Employee	Description of interest	Has Senior management been notified of the interest?	Date of disclosure	Steps taken by Senior Management for dealing with the conflict	Actions taken by the Employee to address the conflict



Appendix C

Gift/ Entertainment Reporting Form (refer to Gift and Entertainment Policy

TO: Name, Business Unit, Company

FROM: Name, Business Unit, Company

DATE: [Click here to enter a date](#)

Please enter in the Register maintained by you in accordance with the Gift and Entertainment Policy of the receipt of the following gift.

Particulars	Complete details
Date received:	
Details of gift or entertainment:	
Estimated Value/ Exact Cost:	
Nature of Gift/ Entertainment:	
Gift/ Entertainment provided by:	

Sign:Date:

Approval

I confirm that I am satisfied that the receipt of the above described gift was appropriate for the reason stated and accorded with the requirements of the Gift and Entertainment Policy.

Signature:Date:

Attachments:

Email Endorsements and Approvals is acceptable.

This form must be filled in for any gift or entertainment received for registry purposes.

