



GRUPE SOCIETE GENERALE

**PRINCIPLES AND RULES GOVERNING THE FIGHT AGAINST
CORRUPTION**

2020

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PREAMBLE

Approach on the Societe Generale Group

Societe Generale Group conducts its business ethically and in compliance with all applicable laws, including laws proscribing corruption, bribery and influence trafficking in all countries in which it operates.

Bribery, corruption and influence trafficking are major causes of poverty, poor distribution and misallocation of wealth. It also impedes economic development, and contributes to the political and social destabilisation of sovereign states. It is universally considered to be serious offenses.

Committing offences involving corruption or influence trafficking can have extremely severe legal (criminal and civil) and financial consequences and seriously harm the reputation and ability to conduct business of any company implicated in such offending.

Judicial authorities around the world are increasingly active in pursuing corruption and influence trafficking, not only in relation to companies but also with their employees. Hence, should any person working at Societe Generale (corporate officer, employee, temporary worker, Volunteering for International Experience - VIE, etc., designated hereafter as “Societe Generale Employee”), commit or participate directly or indirectly in an act of corruption or influence trafficking, in any capacity whatsoever (e.g. complicity) in the course of carrying out his or her professional duties, he or she could be personally liable and could face serious criminal sanctions. In certain cases, Societe Generale may also be held liable for such offences. If a Societe Generale Employee knowingly turns a blind eye (“wilful blindness”) to an act of corruption committed by another person acting on behalf of the company, the said Societe Generale Employee and/or the company could also be criminally liable.

These principles and rules governing the fight against corruption must be brought to the attention of all Societe Generale Employees, as well as to any third parties working for the Group.

OBJECTIVE

The fight against bribery, corruption and influence trafficking requires exemplary behaviour by all Societe Generale Employees to enhance the trust of customers, shareholders, public authorities, employees and all stakeholders (Non-governmental organizations - NGOs, public opinion, etc.).

These principles and rules governing the fight against corruption should serve as a reference to assist Societe Generale Employees to identify situations involving a risk of bribery, corruption or influence trafficking in their day-to-day activities and to act appropriately when faced with such situations, these are also valid for any third party working for the Group.

Societe Generale launched WhistleB, a group wide tool for reporting concerns to a dedicated central team in Societe Generale, on an anonymous basis if desired. The tool is available at: <https://report.whistleb.com/fr/societegenerale>

BRD, as part of the Societe Generale Group, adhered to the code, principles and rules of the Societe Generale Group governing the fight against corruption:

<https://www.societegenerale.com/sites/default/files/documents/Code%20de%20conduite/code-governing-the-fight-against-corruption-and-influence-peddling-uk.pdf>

BEHAVIOUR REQUIRED TO THE BANK'S EMPLOYEES

Any act of corruption or influence trafficking is forbidden in BRD.

The behavior required by the Bank's staff, whether on a personal capacity or in the context of a business relationship, is to refrain from:

- giving, offering or promising, directly or indirectly through others such as third party intermediaries (family members, business partners, close associates), any advantage/benefit to public officials, clients, suppliers, business partners, etc that would or could be perceived as an inducement or as a deliberate act of corruption or influence trafficking;
- soliciting or accepting, directly or indirectly through others such as third party intermediaries (family members, business partners, close associates), any advantage/benefit that would or could be perceived as an inducement or as a deliberate act of corruption or influence trafficking;

Examples of situations that should be red flags:

- Certain indications in interactions with third parties (repeated or extravagant invitations, valuable gifts, unusual invoicing or commissions, emails received from a personal email address, etc.);
- Inducements (promises of personal or professional benefits) or pressure (threats of personal or professional retaliation) with the view to obtaining undue benefit (grant special conditions by way of derogation disclose confidential information, favor a third party, etc.).
- The activities of any supplier/third-party intermediary whose professional or ethical behavior seems dubious.

In response to such signals and the risk associated with situations of potential corruption or influence trafficking, the following actions/behaviors are paramount:

- **Refer** to directives, instructions, internal rules when taking and motivating decisions, whether internal or external.
- **Report** any concerns or suspicions you may have and seek without delay the advice of your manager and Compliance function on the situation in question; if need be, exercise your whistle-blowing rights, as set out in internal regulation. Banl will not tolerate retaliation of any kind, (in terms of promotion, work conditions) against any individual who in good faith reports suspected improper conduct. In the event that the hierarchical superior or Compliance needs legal support for the legality of a particular practice, they will seek the juridical support for the above-mentioned opinion / advice.
- **Do not conclude** any planned transaction until you have clarified with your hierarchical superior and Compliance function that you are not in a position to participate, directly or indirectly, in acts of corruption or influence trafficking

Please find out details, for examples, with regard to red flags that may constitute facts/ acts of corruption.

In the case of cooperation with public officials, in order to prevent the Bank from being exposed to situations regarding the conflict of interest or which may be interpreted as acts of corruption or violations of professional ethics, members of the Bank's staff shall comply with the internal deontological provisions and consult with the Compliance function. Particular attention will be paid to cases where politically exposed persons become / are clients of the Bank, members of the Bank's staff seeking to fulfill all the requirements applicable to them under the internal regulatory framework.

DEFINITIONS

CORRUPTIONS

Corrupt Act means the deliberate act:

- (a) to promise, offer or give, directly or indirectly, through other persons, such as third party intermediaries or
- (b) claim, accept the promise or receive directly or indirectly, through others, such as third party intermediaries, money or other benefits undue to him, including in the form of donation, gift, invitation, reward or any value to any person (including any public official), for themselves or for a third party, in connection with the fulfillment, non-fulfillment, urgency or the delay in the performance of an act regarding its legal duties or in connection with the performance of an act contrary to these duties. They are also considered acts of corruption if they could or could be perceived either as an encouragement to commit an act of corruption, or as deliberately corrupting acts in each case, in order to induce any person (including a civil servant) to perform his functions incorrectly or dishonestly and / or to obtain any undue benefit.

So-called “active” corruption is defined as offering an undue benefit to a person or yielding to solicitation (to provide an undue benefit), in order that they carry out or refrain from carrying out an act related to their professional duties, to delay the fulfillment or to perform an act contrary to their professional duties.

So-called “passive” corruption is defined as soliciting or accepting an undue benefit from a person with a view to accomplishing or refraining from accomplishing an action related to one’s professional duties or an action facilitated by the carrying out of such professional duties, the delay in performing or performing an act contrary to their professional duties

INFLUENCE TRAFFICKING

Influence Trafficking means the deliberate act:

- (a) to claim, receive or accept the promise of money or other benefits, directly or indirectly, for himself or for another, by a person who has influence or is believed to have influence over a public official and who promises that it will cause him to perform, not to fulfill, to hasten or to delay the performance of an act that enters into his duties of service or to perform an act contrary to these duties or
- (b) to promise, offer or give money or other benefits, for himself or another, directly or indirectly, to a person who has influence or is left to believe that he has influence over a public official, in order to determine him to perform, not to perform, to hasten or delay the fulfillment of an act which enters into his duties of service or to perform an act contrary to these duties.

So-called “active” influence peddling consists in offering an undue benefit to a person or yielding to a person’s solicitations (to provide him with an undue benefit), in order that the latter misuses his influence to obtain, to the advantage of the person providing this benefit, a favorable decision from a public authority or administration.

So-called “passive” influence peddling consists in soliciting or accepting any benefit from a person to misuse your influence in order to obtain, to the advantage of the person providing this benefit, a favorable decision from a public authority or administration.

PUBLIC OFFICIAL

Public official means any person who permanently or temporarily, remunerated or not, (i) exercises duties and responsibilities, established under the law, in order to achieve the legislative, executive or judicial prerogatives, (ii) exercises a position of public dignity or a public function of any kind, (iii) exercises alone or together with other persons, within an autonomous corporation, another economic operator or a legal person with full or majority state capital, attributions related to the accomplishment of its object of activity.

GIFT

Gift represents what is received or offered as a gift, such as: product, prize, valuable object, as well as any other advantages regardless of their form.

ILLUSTRATIONS OF THE MAIN TYPES OF CORRUPTION AND INFLUENCE TRAFFICKING

THE GRANTING OF UNDUE BENEFITS AND PAYMENT OF “BRIBES”

“Bribes” are any benefit or anything of value that is offered, promised or given to a person, directly or indirectly, in order to influence the person’s conduct, typically by inducing the person to abuse his or her public or private office to secure an improper advantage or a favourable decision.

The nature of such benefits (or anything of value) may vary greatly and cover in particular:

- ✚ the payment of a sum of money, in cash or on any other support (e.g. gift card);
- ✚ discounts or reimbursements;
- ✚ a service, supply or loan contract or a mandate;
- ✚ an internship, fixed-term or permanent job;
- ✚ confidential or inside information, including about the activity of a company, its customers, suppliers, ongoing projects, or the list of appointments of its corporate officers;
- ✚ a meal or entertainment (tickets to a show, sporting event.).

Not all of these benefits are problematic as such (*per se*) but the context in which they are granted or offered may make them likely to constitute corruption, bribery or influence trafficking, or be perceived as such.

This list is not exhaustive. Remember that an offer or promise of illicit payment (or benefit) could constitute a corruption or influence trafficking offence, even if the person to whom it was intended declines it or even if the payment (or benefit) is not finally made.

It is irrelevant, for the purpose of this rule, whether the benefit is offered directly by the SG Employee or through a third party (e.g. JVs, Partnerships, investment in a third-party company...), and whether it is of direct or indirect personal profit to the latter, the civil servant or the decision making person. There are heightened corruption risks when interacting with Politically Exposed Persons or with “Public Officials”.

Politically Exposed Person is a person exposed to particular risks, he/she has or had important public functions and direct members of his/her family or people known to be closely associated to him/her.

THE RIGHT APPROACH TO TAKE	WHEN TO EXERCISE CAUTION	WHAT TO REFUSE
You have been sent the CV of a child or an acquaintance of a customer, colleague (e.g. an employee of another bank) or service provider (external lawyer, statutory auditor, etc.) seeking an internship or position with the bank. You may forward the CV to the HR department or to the relevant teams, but <i>you should specify</i> , to the sender and to the recipient, that the fact that you have forwarded the CV shall not prejudice the outcome regarding this	You have received precise and strategic information (e.g. analytical accounting data, GDP per customer, customer profitability, slides presenting an internal project, etc.) about a competitor bank from a consultant with whom you have been in discussion and who clearly obtained this information from a previous on-site mission. The information has been shared with you in order to influence your decision about mandating him on a consulting	A customer, Third-party Intermediary or provider insists upon receiving a commission or fee before concluding contract with SG. You are faced with the choice of paying or losing the deal. <i>You must refuse</i> to make any payment and abandon the planned transaction, after having informed your manager and Compliance function, even if your correspondent is very insistent and attempts to intimidate you.

application, which shall be based on the sole merits of the applicant. assignment. He indicates having relationships, he could use to obtain further information. *You must inform* your manager and Compliance function who shall decide on the course of action to be taken (with the possible involvement of Legal Department). This could be tantamount to an undue benefit and may constitute an offence.

GIVING OR RECEIVING GIFTS / HOSPITALITY, ORGANISING OR ATTENDING RECEPTIONS OR EVENTS

Gifts of low value or minor benefits present relatively little risk if they remain reasonable and are given in good faith, without expecting anything in return.

Eg: receiving a „martisor” on March 1st, a greeting card on a family event (birth, wedding) such courtesies are generally permitted. If you find yourself in such a situation, you should refer to internal instructions and, if necessary, raise it with to Compliance function.

Conversely, giving or receiving gifts of high value, giving or receiving hospitality (meals, lodging, and travel) and organising, attending expensive or prestigious receptions or events is forbidden:

- ✚ where this could create a conflict of interests as defined in our instructions,
- ✚ where this could appear or be deemed to be an inducement to give or to obtain an improper benefit in exchange, or to reward an improper benefit already granted,
- ✚ where this breaches the laws and regulations in force or Bank’s internal instructions, particularly those relating to the “gifts /events”.

The risks associated with gifts and entertainment are increasing where the recipient is a “public official”. Always consult the relevant internal regulations and Compliance function before offering or promising anything of value to a “public official”.

THE RIGHT APPROACH TO TAKE

You are thinking of sending a customer a Christmas present or an invitation to an event (sponsored or not by SG). *You must check* and comply the internal regulation related to gifts/events. *You must refer* the question to your manager and/or Compliance function before acting if you are unsure of whether or not this

WHEN TO EXERCISE CAUTION

A customer with whom you have had a business relationship for years to an event (e.g. Grand Slam tournament or an international artist’s concert) has invited you. *You must check* your internal regulation related gifts/events and refer the matter to your manager and Compliance

WHAT TO REFUSE

1/ A supplier invites you to a prestigious event or restaurant to discuss renewal conditions for one of bank’s supply contracts.
2/ you intend to invite a customer to a “Relais et Châteaux” with his / her partner for a weekend during which you will negotiate the sale of product. *You must politely decline* this

gift or invitation is acceptable, if the internal value-limit is being exceeded (even slightly), or if the recipient is a public official or a politically exposed person.

function. You must make sure that it is not an undue benefit.

invitation (1) and renounce to send the invitation (2) Because there is current business pending and it appears to be a lavish meal / sumptuous weekend, this situation is inappropriate.

USING A THIRD-PARTY INTERMEDIARY

Acts of corruption and influence trafficking carried out by Third-Party Intermediaries (e.g. agents, introducing brokers, business provider, distributor) could engage bank's civil, administrative or criminal liability and/or that of its Employees. A high number of corruption / influence trafficking cases worldwide involve Third-Party Intermediaries.

Risk based due diligence must be conducted prior to retaining a Third-party Intermediary. You must never retain a Third-party Intermediary whose professional reputation and legitimacy has not been verified by the relevant services (according to internal regulations related to this field)

Any fact that heightens the risk of corruption (poor reputation, lack of transparency, lack of technical competence in the relevant domain of activity, lack of competitive tendering, conflict of interests, high remuneration, off-market prices, connection to a government official, customer recommendation, unequal treatment, etc.) must alert you to exercise caution. No contract must be entered into force before all suspicions or concerns have been duly handled and resolved.

Payments to Third-Party Intermediaries shall only be made if they are lawful, proportionate to the service provided, comply with the terms of the contract, with all applicable local policies, and upon presentation of an adequate invoice. No payment shall be made without the appropriate documentation (including anti-bribery clauses, approved according to this regulation), establishing the legitimacy of the payment made and services performed. No payment must be made in cash. No payment must be made to a bank account held in a State in which the intermediary does not carry out its economic activity, or held in the name of a third party with no connection to the transaction concerned. You must exercise caution if a transaction under consideration involves a Third-Party Intermediary retained by another party to the transaction.

RULES REGARDING PROVIDERS

Selection and monitoring of suppliers shall be done in accordance with internal normative framework.

New contracts concluded with the suppliers or ongoing contracts together with changing them will include anti-corruption clauses in accordance with the internal regulatory framework.

THE RIGHT APPROACH TO TAKE

You must be especially vigilant and make sure that risk based due diligence has been conducted when selecting Third-Party Intermediaries, who must be in compliance with all applicable bank's instructions, policies and procedures. *You must check* Third-Party Intermediaries' reputation,

WHEN TO EXERCISE CAUTION

You have the slightest doubt about an amount on an invoice from a Third-Party Intermediary, with respect to services provided or a request for the reimbursement of expenses (based on the supporting documents provided). *You must inform* your manager and Compliance function. No payment

WHAT TO REFUSE

A Third-party Intermediary, who introduces you to a customer, requests remuneration which clearly does not correspond to the work carried out or to usual standards, or requests that the amount be paid into an account held with a bank located in a country with a high level of banking secrecy (e.g. Switzerland,

background, and professional competence, and ensure that such facts are documented and stored. *You must consult* your manager and Compliance function if any issues arise during the due diligence process or if you have the slightest doubt as to the probity of a Third-Party Intermediary. No contract with the Third-Party Intermediary or in relation to the transaction involving the Third-Party Intermediary can be concluded, until all remaining doubt or concerns have been dispelled.

shall be made until all doubt or concerns have been dispelled.

Monaco, Lebanon, Lichtenstein, Singapore, etc.) or which is not the country of residence of either the Third-Party Intermediary or the customer and without satisfactory explanations. *You must refuse* to make the payment and inform your manager and Compliance function as quickly as possible.

“Facilitation” payments

Facilitation payments are small amounts paid or benefits given (whatever their value) to civil servants or employees of public bodies or to government authorities in order to facilitate or speed up routine administrative formalities. The facilitation payments are forbidden in the bank.

THE RIGHT APPROACH TO TAKE

A government department or authority asks you to pay a fee (e.g. administrative fee) for a licensing procedure or administrative authorisation. Such a fee is entirely legitimate and proper if it is formalised in an official public document. However, *you must refer* the question to your manager and/or Compliance function should you have the slightest doubt (e.g. lack of documentary evidence).

WHEN TO EXERCISE CAUTION

A public official with whom you are in contact regarding a licensing request sends you an email from his or her personal mailbox asking you to contact them via a non-professional line. *You must inform* your manager and Compliance function as quickly as possible. This is unusual and it may be an attempt to pressure you into making a facilitation payment to obtain the licence.

WHAT TO REFUSE

You have been invited by a public official working for a regulator or supervisor in a country in which you are considering setting up a subsidiary, branch or representative office, to pay an amount of money to a legal or natural person in order to speed up or facilitate the granting of the licence requested. *You must refuse* to pay and inform your manager and Compliance function as quickly as possible. This is a request for a facilitation payment, which is prohibited by the bank.

Charitable contributions and sponsorships

In principle, the Bank has the possibility to sponsor certain activities in the fields of cultural, artistic, medical, sanitary, scientific, etc., under the terms of the law.

It is important to take in consideration that sponsorship actions carried out with the intention of provoking inappropriate behavior from the part of the sponsor can be considered as "bribery". Sponsorships of this nature are forbidden.

Legitimate charitable contributions and event sponsorships using BRD funds or resources are in principle authorised. However, the bank must make sure that these contributions are not, in fact, a means of making payments, which may amount to corruption or influence trafficking (even if the causes defended by the associations are legitimate).

As an example, charitable contributions cannot be made:

- ✚ in the context of a bidding process or during the negotiation of a commercial or financial transaction involving persons linked to the beneficiary;
- ✚ in cash;

- ✚ on current accounts in the name of natural persons or in jurisdictions without links with the mission of the beneficiary of the contribution.

Moreover, charitable contributions made to organisations linked to a Public Official, a client or a prospect (who may be, for example, board member of the organisation) as well as any charitable contribution request or suggestion made by a client / prospect must be subject to scrutiny. They always require the approval of the entity's management and, if necessary, request an opinion from Compliance function.

It is of the utmost importance to check the credibility, the reputation and the background of the organisation receiving the contribution as well as their executives. This due diligence must be carried out in accordance with internal instructions.

THE RIGHT APPROACH TO TAKE

Your branch or your team has received a request to subsidise a concert or cultural event to raise funds for a charitable cause. Before accepting, *you must check* that this complies with bank's internal and legislative policies and carry out the appropriate due diligence (internet research on reputation, links with SG customers or projects) to be certain of the lawfulness of the subsidies in question and the absence of their use as a means of corruption. *You must also refer* the matter to your manager, and/or Compliance function.

WHEN TO EXERCISE CAUTION

A local mayor has requested a charitable contribution or sponsorship in aid of a local sports club. Particular vigilance is required because the request came from a public official. *You must determine*, together with your manager and Compliance function the underlying intentions to ensure that they are entirely disinterested and whether a contribution by bank would be appropriate. You should refer to internal policies related to gifts and entertainment to determine whether the contribution or sponsorship is permissible.

WHAT TO REFUSE

A local authority is looking for a bank to fund the renovation of a school. One of the city councillors has requested a charitable contribution or sponsoring in aid of the local sports association chaired by him/her. He/she indicates that he/she can convince the City Council to retain bank in return. *You must refuse* to make the payment and inform your manager and Compliance function as quickly as possible. The city councillor appears to be soliciting something of value in exchange for influencing the City Council in its decision making process.

Political and religious donations

Bank, in line with Societe Generale's policy, is committed to a policy of political and religious neutrality, as well as of abstaining from supporting any political and religious activities.

The members of the Bank's staff are bound to have an objective, neutral attitude towards any political and religious interest in the exercise of the employment relationship. Bank's Employees are not permitted to make political or religious donations on behalf of the bank.

The political or religious activity carried out by employees, in their personal capacity, can be done with the following cumulative conditions:

- take place outside the Bank's premises;
- take place after the program;
- not to position themselves as Bank representatives in these relationships / activities;
- Not to benefit from the Bank's employee status.

THE RIGHT APPROACH TO TAKE	WHEN TO EXERCISE CAUTION	WHAT TO REFUSE
<p>You have been asked, in the course of carrying out your professional duties, to make a political donation. <i>You must inform</i> your manager and Compliance function without delay.</p>	<p>One of your customers, who is reputedly close to a local or national political figure, requests a donation towards an association (cultural, philanthropic, think tank, etc.). <i>You must inform</i> your manager and Compliance function as quickly as possible to determine whether the donation is appropriate.</p>	<p><i>You must refuse</i>, in response to a customer's, suppliers or Third-Party Intermediary's request, to donate to political parties, irrespective of whether commercial prospects could be linked to the donation. This is highly unusual and could be, or appeared to be as an attempt to obtain subsequent undue benefits.</p>

Corruption of influence trafficking committed by customers via their BRD/Société Générale account(s)

Bank's employee must be alert to red flags that customers to launder the proceeds of corrupt activities or influence trafficking are using accounts. Compliance with legislative/internal regulations related to AML/KYC is essential to prevent this.

THE RIGHT APPROACH TO TAKE	WHEN TO EXERCISE CAUTION	WHAT TO REFUSE
<p>In the event of any doubt or suspicion over the lawfulness of a transaction requested or carried out by an BRD customer or in the event of negative information via the press or social media networks about a customer's</p>	<p>1/ one of your corporate customers regularly makes international transfers of significant amounts to destinations not consistent with the stated economic purpose or business profile. 2/ Your attention has been</p>	<p>One of your customers, a company operating in civil engineering on behalf of various sovereign states asks you to set up an off-shore trust (e.g. Panama, OECD non-cooperative country, Switzerland),</p>

reputation, <i>you must inform</i> your manager and Compliance function, in accordance with anti-money laundering internal rules and procedures.	drawn to the existence of international cash transfers on accounts opened in the name of non-resident clients who are Politically Exposed Persons, Public Officials or persons close to such persons. <i>You must inform</i> your manager and Compliance function as quickly as possible in accordance with internal anti-money laundering rules and procedures.	with the wife or children of a minister as ultimate beneficiaries. <i>You must refuse</i> any involvement in this transaction and inform your manager and Compliance function as quickly as possible. This is a red flag because there does not appear to be a legitimate purpose for setting up a trust for the benefit of government officials in a country with high level of banking secrecy.
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Documentation, accounting records and archiving

The administrative and accounting traceability of various acts and payments must be carried out properly and provide enough detail to demonstrate their legitimacy and to avoid any suspicion of dissimulation of inappropriate facts. Documentation demonstrating the appropriate nature of the relevant services and acts, as well as diligence carried-out must be stored, together with proof of the identity of the payers and payees, in accordance with internal instructions.

THE RIGHT APPROACH TO TAKE

You receive a non-standard invoice from a customer, supplier, public official or Third-Party Intermediary (i.e. that is not on business letterhead and does not provide any detail of the services provided). *You must return* it and request a formal invoice.

WHEN TO EXERCISE CAUTION

1/ You have the slightest doubt regarding an invoice that would appear not to correspond to a service provided or which is obviously under or over-valued. You must contact your manager and Compliance function.
 2/ You discover that “procurement” procedures, for a given supplier, have been circumvented or not been respected.
 3/ your manager has asked you not to copy emails to him or include him in email exchanges concerning a particular transaction. *You must inform* your manager (senior manager in case 3) and Compliance function as quickly as possible. Concerning the last case, such an attitude is unusual and it may mean that your manager does not want his/her name to be associated with an irregular operation.

WHAT TO REFUSE

You are being subjected to great pressure by your line manager to conclude a transaction (loan, market transaction, etc.) despite the fact that you have not gathered the documents necessary to approve the transaction and all the indicators (internal validations, risk indicators, messages from entities within the bank) lead you to believe that the transaction has not been authorised. *You must refrain* from concluding the operation and inform the matter to Compliance function and, if need be, exercise your whistle-blowing rights.

Remember: Each one of us must take individual responsibility for complying with anti-corruption instruction and report potentially suspicious activity without delay. When questions arise, contact your manager or Compliance function.