

BCR Group Anti-corruption Policy

Accountability of employees must be integrated part of our business model. Our behavior and attitude dictates how we are perceived by our customers, both at individual level and at the level of organization which, in this view, is our reflection, its employees.

We are 7,000 people with responsibilities, duties and different ways of thinking, but we have a shared responsibility to ensure the integrity of the image for the organization in which we work. Therefore, in BCR Group we show zero tolerance in relation to any act of corruption.

1. What is corruption and how we understand corruption at BCR Group level?

Corruption is an active or passive abuse, direct or indirect, committed by a BCR Group employee or collaborator in order to obtain financial advantages or other unfair advantages (goods and services) for himself/herself or for a third party related to a BCR Group employee.

Corruption targets a set of illicit or immoral activities /actions committed not only by individuals, but also by different public and private groups or organizations, aiming to obtain material or moral advantages or a higher social statute, through utilization of some abuse forms, constraint, blackmail, deception, bribery, intimidation, threatening.

In the vision of BCR Group corruption represents:

➤ The act committed by one employee/collaborator or other assimilated to promise, to offer or to give, direct or indirect, through a third party (indirect) to a person who holds a position with decision attribution or any other position in a public or private sector an unmerited advantage (goods or other unfair advantage) of any nature to themselves or to a third party who can offer a facilitation and in exchange that person to fulfill or to fail to meet an activity, thus breaching one of his/hers responsibilities.

➤ The act committed by one employee/collaborator or other assimilated to request or to receive direct or indirect (through a third party), an unmerited advantage (goods or other unfair advantage), of any nature for him/her or from a third party or the act of acceptance the promise of such advantage aiming to fulfill or fail to meet an activity in breach with his responsibilities.

2. Why we need to have an anti-corruption policy

We wrote the Anticorruption Policy because all of us must understand in the same way behavior of business premises based on integrity, transparency and honesty, and to have the same proactive way in combating corruption.

We must act with zero tolerance in relation to any corruption act because fraudulent acts committed by one employee can affect the entire organization and solidity of all business conducted by BCR Group.

We are and represent BCR in front of the customers, vendors and any other third party that we come in contact. Therefore, we must have high integrity and professionalism standards, and we must behave respectfully, honestly and everything we perform in any circumstance, even if by

this behavior we risk losing a business opportunity or even affect the market share of our organization.

BCR Group has committed to respect national and international legislation in terms of combating corruption. The rules and principles mentioned in our legislative framework are valid for any of us: employees, collaborator, supplier, legal representative or persons working in favor of the organization.

None of us do not seek or offer bribes or other material advantages of any kind. We expect to be treated the same way by our collaborators and business partners.

It is more important to respect the rules and principles contained in this document than to develop new business opportunities or to conclude business relations with existing and potential customers at any price. Therefore, none of us, employee, collaborator or partner cannot be punished, penalized or warned if he/she complies with ethical considerations of BCR Anticorruption Policy.

3. Procurement process

Procurement is a centralized process and is conducted according to BCR Group methodology. Any vendor which tries to corrupt a BCR Group employee or a Management Body member in order to influence a tender/auction process will be immediately disqualified and access to future tender process will be banned.

Bank's vendors are encouraged to report any request of bribery or other unfair benefits received from one BCR employee or member of Management Body having as objective rigging/alteration of a tender/auction process. Reporting messages can be sent to: BCR.whistleblower@bcr.ro

4. Donations and sponsorships

BCR understands the need of society development and wants to play an important role in increasing the development level of Romanian society. We participate at actions aiming to develop cultural, social and educational environment.

Thus yearly if the financial results allow it BCR can support material and logistic, public, cultural and educational institutions through sponsorship. We put our reputation and integrity above all, thus BCR will sponsor only entities with flawless reputation and which through sponsorship agreement cannot affect BCR Group reputation.

BCR is not a political organization. Thus BCR does not offer sponsorship or other grants direct or indirect to political parties/organizations and does not contribute (in any form) direct or indirect to political campaigns.

All donations/sponsorships will be made exclusively through wire transfers and will be properly registered in beneficiaries/sponsor accounting internal system. If inappropriate use of sponsorship/donation object is noted, the sponsor/donor is entitled to request reimbursement of the amounts object of donation/ sponsorship.

5. Help us to identify any corruption act!

Do not be passive when you're exposed to a situation or a person who violates the values, rules and principles of our organization.

Inform us! We have provided through the Whistleblower Procedure, the following reporting channels any suspicions or concerns you may have regarding a possible corruption case:

Fix land Line (individual) 021/312.18.09

E-mail address: bcr.whistleblower@bcr.ro

6. How we sanction corruption

BCR Group has zero tolerance for corruption practices. Any breaches of the provisions of the present policy or of the local legislation related to prevention and sanction of corruption is considered a severe deviation and can lead to the termination of any contractual/collaboration relation and restrict any future collaboration with BCR Group.

7. Definitions

BCR Group -BCR and its Subsidiaries

Bribery any form of reward granted with the intention to influence any party to do something dishonest, illegal, or unethical. The bribe can take many forms, including offering or accepting direct or indirect payments, services, excessive gifts, charity donations, sponsorships or preferential treatment. Preferential payments are small payments made to secure or accelerate a service which the payer has a legal right to receive, or to which he/she is entitled.

Corruption is an active or passive abuse, direct or indirect, committed by a BCR Group employee or collaborator in order to obtain financial advantages or other unfair advantages (goods and services) for himself/herself or for a third party

BCR Group employee- private individual working for BCR Group on a contractual basis, regardless of the nature of the contractual relationship and duration, but not limited to the employee hired for a determined period of time.

Partner/collaborator of BCR Group- any physical and or juridical entity who has a commercial contract with BCR or its subsidiaries based on which an activity is performed (e.g. vendor of goods and services).