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Drafted by	Chief Compliance Officer
Owner	Chief Compliance Officer
Co-owners	CLO
Approved by	Management Board
Responsible for implementation	Chief Compliance Officer, CLO, MLRO 1st Line Managers (in day-to-day management of their subordinate employees)
Applicable to:	Finora Bank, UAB, Finora Bank EE Branch, Finora Group AS
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STATEMENT ON ANTI-CORRUPTION AND ANTI-BRIBERY

Finora Bank, UAB, as a specialised bank established and operating in the European Union, supervised by the Bank of Lithuania, declares and confirms that:

We maintain a zero-tolerance stance toward corruption, bribery, facilitation payments, and any form of improper influence. This Statement sets out our principles and commitments, aligned with EU and national legislation, guidance from European supervisory bodies, and best practices of reputable EU banks.

Our commitment

- **Zero tolerance:** We strictly prohibit offering, giving, requesting, accepting, or authorising any bribe, kickback, or undue advantage—directly or indirectly—to secure or retain business, influence a decision, or gain any improper benefit.
- **Legal compliance:** We comply with applicable EU and national anti-corruption and anti-bribery laws, including rules enforced by the Bank of Lithuania, anti-money laundering and counter-terrorist financing (AML/CFT) requirements, sanctions, tax integrity, public procurement, and related reporting obligations.
- **Integrity by design:** We embed ethical conduct into our governance, risk management, client relationships, procurement, outsourcing and employee performance.

Scope

- **People:** This Statement applies to all Finora Bank managers, employees, trainees, temporary staff, and persons acting on our behalf (e.g., agents, intermediaries, consultants).
- **Third-parties:** We also expect the same standards from suppliers and other third parties in our value chain.
- **Geography and counterparties:** It applies to all activities of Finora Bank UAB in Lithuania and the Finora Bank EE Branch, as well as cross-border activities conducted under EU passporting rules.

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Prohibited conduct

- **Bribery and kickbacks:** Offering, promising, giving, requesting, or accepting anything of value to improperly influence actions or decisions, including through third parties.
- **Facilitation payments:** Any "speed" or unofficial payments to expedite routine actions are prohibited.
- **Improper gifts and hospitality:** Gifts, entertainment, or hospitality that are excessive, concealed, conditional, or intended to influence a decision are not allowed.
- **Conflicts of interest:** Personal interests must not affect—or appear to affect—professional judgment. Conflicts must be disclosed and managed in accordance with the Conflicts of Interest Procedure.
- **Political and charitable contributions:** No political donations are made by the Bank. Charitable contributions and sponsorships must be transparent, approved, and never used as a conduit for undue influence.
- **Books and records:** False, misleading, or off-book records are strictly forbidden. All payments and benefits must be accurately recorded with a clear business purpose.

Controls and expectations

- **Due diligence:** We conduct proportionate due diligence on higher-risk third parties (e.g., intermediaries, introducers, key suppliers), focusing on integrity, beneficial ownership, sanctions, and adverse media.
- **Contractual safeguards:** Engagements with third parties include anti-corruption clauses, audit and termination rights, and clear expectations on conduct.
- **Gifts and hospitality:** Only modest, proportionate, and transparent business courtesies are permitted, recorded where required, and never linked to an expected advantage.
- **Procurement:** Competitive, transparent selection with segregation of duties and robust documentation.
- **Financial controls:** Multi-person approvals, documented business justifications, and periodic reviews to detect anomalies.
- **Record-keeping:** Accurate, complete, and timely records that evidence compliance, retained per legal and regulatory requirements.

Reporting and protection

- **Speak up:** Employees and partners must promptly report suspected or actual bribery, corruption, or related misconduct via internal channels (including the Chief Compliance Officer) or, where appropriate, directly to competent authorities (e.g., the Bank of Lithuania or law enforcement).
- **Non-retaliation:** Good-faith reporters are protected from retaliation. Concerns will be handled confidentially, investigated impartially, and addressed promptly.
- **Escalation:** Material concerns are escalated to senior management and, where appropriate, to the Management Board or in extremely sever cases – to the Supervisory Board.

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Roles and accountability

- **Board and senior management:** Set the tone from the top, approve and oversee the anti-corruption framework, allocate resources, and review effectiveness.
- **Chief Compliance Officer (CCO):** Maintains policies and procedures, advises on controls, oversees investigations, and reports to management and to the Management Board.
- **Managers:** Lead by example, reinforce standards in daily operations, and ensure team adherence.
- **Employees and third parties:** Must comply with this Statement and related policies, complete required training, and refuse and report improper requests.

Training and continuous improvement

- **Training:** Regular, risk-based training for all staff and targeted training for higher-risk roles (e.g., front end staff, procurement, key functions, identified staff and other executives, involved in decision taking process).
- **Monitoring and audits:** Ongoing monitoring, thematic reviews, and independent audits to test effectiveness.
- **Reviews:** This Statement and related procedures are reviewed at least annually and updated to reflect regulatory changes, supervisory guidance, and industry best practices.

Consequences of breach

Violations may result in disciplinary action (up to and including termination), contract termination for third parties, internal and external reporting, and potential civil/criminal penalties for individuals and the Bank.

For questions or to report concerns

- Email: compliance@finorabank.eu
- Alternatively, use the channels set out in our Whistleblowing Policy. Reports may also be made to competent authorities as permitted by law.

This Statement is approved by the Management Board of Finora Bank UAB and applies with immediate effect. It reflects our unwavering commitment to ethical, transparent, and compliant banking.

Chairman of the Management Board of Finora Bank, UAB

Šarūnas Ruzgys