

Anti-bribery and anti-corruption disclosure

Anti-bribery and anti-corruption

The Bancorp seeks to conduct business in accordance with high ethical standards designed to support compliance with all applicable anti-bribery and anti-corruption (ABAC) laws, including the U.S. Foreign Corrupt Practices Act and any laws in countries where The Bancorp does business.

Anti-Bribery and Anti-Corruption Policy

With this commitment in mind, The Bancorp prohibits bribery and corruption and maintains policies and procedures intended to detect and prevent improper conduct. The Bancorp Anti-Bribery and Anti-Corruption Policy (ABAC Policy) strictly prohibits employees and third parties with whom The Bancorp does business from:

- Offering, paying, promising, or authorizing any bribe, including any kickback, or other thing of value, to anyone for a corrupt purpose—such as making improper payments or benefits to any foreign public official (including any government official or government employee and related persons) to secure any contract, concession, or other improper advantage for The Bancorp; or
- Offering, promising, or otherwise giving “anything of value” to a foreign official to gain an improper business advantage. Under the Bank’s ABAC Policy, the term “anything of value” includes, but is not limited to cash payments, improper charitable and political contributions, gifts, entertainment, or other business promotional activities.

Our ABAC Policy also includes requirements to:

- Keep accurate books and records, supported by internal accounting controls designed to promote accurate recording and reporting;
- Exercise special care when facilitating or making transactions that may involve payments to foreign officials, including promptly reporting and properly recording the purpose, amount and other relevant factors;
- Conduct risk-based due diligence and oversight of agents, intermediaries, service providers, and other third parties with whom The Bancorp does business;
- Conduct due diligence and an assessment of ABAC risks in connection with any contemplated mergers or acquisitions; and
- Report potential violations of the Policy (anonymously or otherwise), with a prohibition on retaliation against those who make good faith reports

Anti-Bribery and Anti-Corruption Compliance Program

The Bancorp’s Anti-Bribery and Anti-Corruption Corporate Compliance Program (ABAC Compliance Program) is reasonably designed to implement the ABAC Policy in accordance with applicable regulatory guidance. The Bancorp’s General Counsel has primary oversight responsibility for overseeing the ABAC Policy and ABAC Compliance Program and works in collaboration with the Bank Secrecy Act Officer, Chief Risk Officer, and others to fulfill the requirements of the ABAC Compliance Program. Core requirements of the ABAC Compliance Program include:

- A governance structure with autonomy and resources dedicated to the ABAC function;
- Risk assessment and management processes;
- Training and communication protocols;

- Periodic monitoring and testing activities intended to support compliance; and
- Confidential reporting and investigation protocols, including reporting to senior management and the Board of Directors.

Employees who violate the ABAC Policy or applicable ABAC laws and regulations will be subject to disciplinary action, up to and including termination consistent with applicable law and The Bancorp's policies.

End of document