

# CHARITIES

## POLICY STATEMENT

The Group takes appropriate measures to ensure that when supporting and / or making donations to local or global charities we give full and due consideration to the ownership structures, appropriate legislation and regulatory guidance, partnerships and business models as well as the cause' driving those charities.

In recent years Charities have become a recognised typology for the facilitation of money laundering, terrorist financing (ML/FT) and disguising of bribery payments; as a result this Policy forms part of the Groups response to prevention of ML/TF and Bribery. Involvement in, or facilitation of any such activity would have serious legal and negative reputational impact on the Group, and society in general.

It is our Policy that in considering charitable associations / contributions we will;

- Establish procedures to ensure all internal and external requests in relation to regional charitable support are considered, in accordance with this Policy and the related Regional Charity Committee Guidelines & Procedures
- terminate relationships with charities whose conduct gives rise to suspicion of involvement with illegal activities, including human trafficking, slavery, bribery, money laundering or terrorist financing
- Review any payments/donations to charity, risk assess and ensure appropriate records are maintained for all stages of the process including an assessment by Corporate Integrity where/ if required
- Where a Group employee of any level, is connected to a charity supported by the Group then a Conflict of Interest declaration must be made, as detailed in the Group's Conflicts of Interest Policy
- Ensure all statutory and regulatory obligations to prevent money laundering (AML) and terrorist financing (CFT) are met in full and applied as a minimum standard, in conjunction with the Group's AML/CFT Policy
- Ensure compliance with the Group's Anti-Bribery Policy, Anti Money Laundering and Countering the Financing of Terrorism Policy and Political Activities Policy regarding any charity request
- Apply the requirements of the Group's Probity Policy in full; conducting appropriate due diligence on charities to which we contribute