

Anticorruption

Corruption is a crime which is actively enforced against people and companies in all the places where National Bank of Canada and its affiliates do business.

Anticorruption Program

National Bank has set up a robust anticorruption program that applies to any employee or intermediary of the Bank and its affiliates and to each of their directors.

Our anticorruption program expresses the Bank's greater ethical values and our renowned commitment to corporate responsibility, wherever we are in the world.

At the heart of our anticorruption program is our anticorruption policy.



Corruption is involvement with a promise, offer, acceptance or transfer of a **Bribe**. A **Bribe** is a personal benefit to influence or reward an act of someone in the public or private sector, if done to gain an unfair business advantage

Anticorruption Policy

It's against anticorruption law and the Policy to:

- ✓ Participate directly or indirectly in Corruption
- ✓ Conceal Corruption, including in the Bank's books and records
- ✓ Fail to report Corruption where you think it'll happen or has happened
- ✓ Retaliate against an Employee that has reported on Corruption
- ✓ Make a false report on Corruption or abuse our power under the Policy
- ✓ Put pressure on another Employee to disrespect the Policy, including to hire an unqualified job applicant

Any employee that is found to have stepped offside the anticorruption Policy is subject to corrective and disciplinary measures.



Did you know that it was National Bank's **Board of directors** that had first asked that the Anticorruption Policy be created?

Bank's Board of directors and Chief Anti-Money Laundering Officer are responsible for enforcing the anticorruption Policy and are clearly and actively committed to the program.

Reporting of an Act of Corruption

The employees, clients and other persons who aren't employees can report on Corruption to the Client Ombudsman.

Your identity will stay confidential when you report on Corruption, unless you've given your clear written consent or unless the government needs your name.

You're protected from reprisals by any employee affected by your report. Any employee who'd even threaten to retaliate against you for having filed your report will face corrective and disciplinary measures.

Contact the Office of the Client Ombudsman



- ❖ 1-888-300-9004 or 514-394-8655
- ❖ ombudsmanethic@nbc.ca
- ❖ Client Ombudsman – Ethics, National Bank of Canada, P.O. BOX 275, Montréal (QC), H2Y 3G7