

Funding Circle Global Anti-Bribery & Corruption Policy

Funding Circle operates in a culture of compliance. Funding Circle is committed to complying with all applicable Anti-Bribery and Corruption Laws, and to the implementation of risk-based policies, standards, procedures, and internal controls designed to prevent bribery and corruption. Funding Circle is bound by the UK Bribery Act of 2010 (the “Bribery Act”) with respect to the Company’s conduct in the UK and abroad; therefore, any act of bribery or corruption committed in a Funding Circle subsidiary may be held a violation of the Bribery Act.

The Anti-bribery and Corruption (“ABC”) Policy defines both bribery and corruption and outlines the management of ABC risk at Funding Circle. The ABC Policy should be read in conjunction with the Global Conduct and Compliance Risk Management Policy, the Global Conflicts of Interest Policy, and other relevant policies.

Bribery is a criminal offence in most countries. In addition, some countries, notably the US and the UK, have enacted anti-corruption laws, which apply to the actions of individuals and companies even when they are outside the US or the UK. Breaches of these laws can lead to very severe penalties for companies and individuals.

The ABC Policy applies to all aspects of Funding Circle’s business activities and to all Company Employees. Funding Circle Employees are required to comply with the ABC Policy and all applicable Business Unit Standards. Funding Circle’s zero-tolerance approach to bribery and corruption is taken into account when entering into relationships with suppliers, contractors and business partners at the outset of the business relationship and as appropriate thereafter. For more information see: [Supplier Assurance.] Funding Circle will not make, and will not accept, facilitation payments or kickbacks of any kind in any jurisdiction. Therefore, all Employees must:

- Comply with all applicable anti-bribery and corruption laws and Funding Circle’s relevant policies, standards, procedures and internal controls; and
- Avoid any activity that might lead to or suggest that a facilitation payment or kickback will be made or accepted by them or by Funding Circle.

To ensure the risks relevant to bribery and corruption are properly managed, Funding Circle will adhere to the following principles as laid out in the Bribery Act:

- The scale of Funding Circle’s ABC Program and procedures designed to prevent bribery by or of Employees or by other persons associated with Funding Circle are proportionate to the bribery risks Funding Circle faces and to the nature, scale, and complexity of its business activities;
- Senior management and all other Employees are committed to preventing bribery by or of Employees or other persons associated with Funding Circle; ensuring a culture within the business in which bribery is never acceptable;

- Conduct risk assessments and compliance monitoring on a periodic basis to assess the nature and extent of Funding Circle's exposure to potential external and internal risks of bribery on its behalf by Employees or other persons associated with it - for example, we conduct annual risk assessments of all financial crime related risks including anti-bribery and corruption, which are generally considered as low risk in connection with our business;
- Apply due diligence procedures, taking a proportionate and risk-based approach, in respect of persons who perform or will perform services for or on behalf of Funding Circle, in order to mitigate identified bribery risks;
- Ensure the bribery prevention policies and procedures are embedded and understood throughout Funding Circle through internal communication, including training, that is proportionate to the risks the business faces; and
- Monitor and review procedures designed to prevent bribery by Employees and other persons associated with the business and making improvements where necessary.

It is never acceptable for any Funding Circle Employee (or someone on their behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Accept a payment, gift or hospitality from a third party with knowledge or expectation that it will provide a business advantage for them or anyone else in return;
- Threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any other activity that might lead to a breach of this Policy.

The ABC Policy allows appropriate gift and hospitality (given or received) to or from third parties, provided that the Gift and Hospitality Procedure is adhered to. Funding Circle recognises that practices vary between countries and regions and what may be normal and acceptable in one region may not be in another.

Funding Circle does not make contributions to political parties. The Company only makes charitable donations that are legal and ethical under local laws and practices. Furthermore, no donation may be offered or made without prior Compliance approval.

All employees receive training at onboarding as well as periodic and refresher trainings to ensure they have sufficient awareness and understanding of the Company's policy related to anti-bribery and corruption. The training highlights the importance of complying with the ABC Policy. Training is logged, tracked and monitored to ensure appropriate ABC training has been administered.