

Anti-corruption statement





A clear stance

Norion Bank has zero tolerance for bribery and corruption and no risk appetite towards such conduct. This applies across all aspects of our business, in every relationship and in all situations.

Norion Bank has a responsibility towards its customers, shareholders and other stakeholders to ensure that neither Norion Bank nor its employees engage in acts of bribery or corruption, and that all applicable laws and regulations are complied with. We are convinced that long-term trust can only be built on honesty and accountability. Norion Bank therefore works actively and systematically to prevent, detect and manage corruption risks.

ANTI-CORRUPTION STATEMENT

What we prohibit

Norion Bank does not permit any form of bribery or improper benefits. No employee or third party acting on our behalf may offer, promise, request or accept such benefits under any circumstances.

Our view on benefits

Gifts, hospitality and other benefits may occur as a natural part of business relationships. However, they must always be characterized by openness, moderation, and be able to withstand public scrutiny.

Any benefit that may influence, or be perceived to influence, the recipient's objectivity or decision-making is considered improper and therefore prohibited, regardless of its value or intent.

How we work

Norion Bank applies a risk-based approach to prevent corruption. We continuously assess our operations to identify potential vulnerabilities and areas of exposure.

We conduct appropriate due diligence on suppliers, consultants and other external partners and set clear requirements for how they are expected to act. At the same time, we ensure that all employees are provided with the knowledge, guidance and support needed to act appropriately and with integrity in all situations.





Speaking up

Norion Bank encourages a culture of openness and accountability. Employees and third parties are expected and encouraged to promptly report suspected misconduct or breaches of this statement. Norion Bank have established whistleblowing procedures to actively facilitate the reporting of concerns confidentially and without fear of retaliation.

Responsibility at all levels

Preventing corruption is a shared responsibility across the entire organization. Our commitment to integrity is embedded in our governance structure and daily operations and does not sit with one person or one function.

Part of something bigger

Norion Bank's anti-corruption work forms part of our broader commitment to responsible and sustainable banking. We aim to contribute to a financial market characterised by trust, fairness and integrity.

 **Norion Bank**