



## **Anti-Bribery and Corruption Policy of Phongsavanh Bank Limited**

### **1. Purpose**

1.1 Phongsavanh Bank Limited (hereinafter called “PSVB” or the “Bank”) is committed to the highest standards of business conduct and has zero tolerance for bribery and corruption. At PSVB, all employees of the Bank (the “Employees”) are required to follow all applicable laws, rules, and regulations related to anti-bribery and corruption under the laws of Laos PDR and other similar laws and regulations in other countries/jurisdictions when conducting business there or where appropriate.

1.2. PSVB’s anti-bribery and corruption policies including guidelines on acceptable behaviour and other relevant policies are stipulated in the Bank’s Code of Conduct (the “Code”) which is available on the Bank’s intranet, and clearly communicated to Employees at all levels.

1.3. The Bank has a strong stance against all forms of bribery and corruption and has stipulated clearly in the Code its restrictions in soliciting or accepting any advantage from others as well as offering any advantage to an agent of another or public servant by its Employees.

1.4. All Employees are required to review [and acknowledge] that they understand and agree to the Code. Refresher training is periodically arranged to ensure that all Employees are aware of the Bank’s zero-tolerance stance on bribery and corruption.

1.5. Employees are expected to adhere to the Bank’s policies and rules in relation to anti-bribery and corruption, which include but are not limited to the following broad headers:

### **2. Conflict of Interest Policy.**

Employees are required to avoid any conflict of interest situations or the perception of such conflict. To assist Employees to identify situations where conflicts of interest may arise and to set out the Bank’s measures for prevention or management of these conflicts, the Bank has put in place a Conflict of Interest Policy which all Employees shall strictly follow. Whenever Employees have any financial or non-financial interest, direct or indirect, in a customer, supplier, or other principal dealing with the Bank, and that interest is of such an extent that it might reasonably affect their judgment or decisions exercised on behalf of the Bank, they have to declare their interest and refrain from making the decision themselves. Employees should decline to provide any assistance, advice or information to a customer, supplier, or other principal dealing with the Bank for any acts that deviate from the legitimate and/or normal course of action.

### **3. Conduct When Obtaining Business**

Employees are prohibited from offering any bribe or advantage (including but not limited to any gift, loan, fee, reward, commission, employment contract, etc.) to any person, public servant, agent of a company or an organisation in relation to the business of his / her principal, in order to influence his / her execution of duties in relation to his / her principal's affairs, whether directly or indirectly.

#### **4. Personal Benefits**

In general, Employees are prohibited from soliciting, accepting, or retaining personal benefits from any other Employee, customer of the Bank, or any individual or organisation doing or seeking to do business with the Bank. The Bank has put in place guidelines and procedures which Employees shall follow when personal benefits are accepted or retained under specified circumstances.

#### **5. Whistleblowing Policy**

The Bank has also put in place a clear Whistleblowing Policy and Procedure, to ensure that Employees can report illegal, unethical practices or irregularities related to PSVB (including any suspected bribery and corruption activities) in good faith, without the fear of personal repercussions or the risk of reprisals.

6. Employees who fail to comply with any internal or regulatory requirements related to anti-bribery and corruption will be subject to disciplinary action (which may include termination) initiated by the Bank and where applicable, to criminal prosecution if the law enforcement authority considers appropriate.

7. All directors, agents, contractors, suppliers and associated persons are also expected to act in compliance with all applicable policies, laws, rules and regulations related to anti-bribery and corruption in the performance of their services for or on behalf of PSVB. The Bank reserves the right to terminate any business relationship that violates its zero-tolerance policy against bribery and corruption.

8. This Statement shall be reviewed bi-annually and as required to ensure its relevance and effectiveness.

9. Should there be any discrepancy between the English version and the Laos version of this Statement, the English version shall apply and prevail.

At Vientiane Capital, date: 22 January 2020

**Bounthanh Vongsoury**  
Chairman of Board of Directors  
Phongsavanh Bank Limited