

Classification: PUBLIC

# Policies, Advocacy, Ratings, and Certifications

## ESG Ratings and Certifications

B Corp	Active (Certified in August 2023)
EcoVadis	Active (Platinum Rating - 2025)
S&P CSA Global Score	Active - Score of 37 (2024 – 77 <sup>th</sup> Percentile)
Sustainalytics ESG Rating	Pending

## Policies and Statements

Terms of Dealing and Regulatory Compliance and Conduct Policies	<p><b>(Public) Terms of Dealing Policy <a href="#">(Link)</a></b> <b>Statement:</b> This document describes the trading relationship between “you” and The Group. This document supplements, but does not replace, The Group’s General Terms and Conditions and FX Services Schedule (the “Terms”). In the case of any conflict between this document and the Terms or any document incorporated therein, the Terms will prevail. The document outlined our Code of Conduct in terms of dealing. All other references to our Code of Conduct are with our Regulatory Compliance &amp; Conduct Risk Policy.</p> <p><b>(Internal) Regulatory Compliance &amp; Conduct Risk Policy</b> <b>Statement:</b> The purpose of this Policy is to set out the Group’s approach to managing Regulatory Compliance and Conduct Risks within the approved Risk Appetite and the relevant laws and regulations. The Group is dual regulated in the UK by both the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA). As such the Group must comply with both sets of regulatory requirements. This policy primarily focuses on FCA requirements, with some aspects of Prudential regulation and elements of Conduct risk covered in other policies such as Treasury, Operational Risk, Financial Crime, and Credit Risk.</p>
Anti-Bribery and Corruption	<p><b>(Internal) Group Financial Crime Prevention Policy</b> <b>Statement:</b> The Group has no appetite for Bribery or Corruption in any form and complies with all applicable Bribery and Corruption laws and regulations in the countries in which it operates. The Group must ensure it has appropriate systems and controls in place to meet the requirement of the bribery and corruptions provisions in legislation and mandated by this policy.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> 1. Reported Cases of Bribery, 2. Reported Cases of Corruption, 3. Reported Cases of Whistleblowing</p>
Anti-Money Laundering	<p><b>(Internal) Group Financial Crime Prevention Policy</b> <b>Statement:</b> Financial risk is presented by criminal activity in the form of money laundering, terrorist financing, bribery and corruption, sanctions, and tax evasion. The Group has no risk appetite to operate in an environment where systems and controls do not enable the identification, assessment,</p>



	<p>monitoring, management, and mitigation of financial crime risk. There is no appetite for staff to fail to have an appropriate understanding of financial crime risks and their responsibilities to mitigate them. There is no tolerance to breach relevant financial crime regulations and laws systematically or repeatedly. The Bank performs adequate due diligence when on-boarding and retaining clients.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> 1. Reported Cases of Money Laundering, 2. Reported Cases of Whistleblowing</p>
<b>Client Due Diligence</b>	<p><b>(Internal) Group Financial Crime Prevention Policy</b></p> <p><b>Statement:</b> The Group Financial Crime Compliance (FCC) sets the minimum requirements for Client Due Diligence (CDD) and should document and maintain a separate CDD Standards document which meets the requirements of this policy. These are approved by the Financial Crime Risk Committee (FCRC) and reviewed at least annually. The Group's operations must maintain detailed CDD procedures, have adequate systems and a dedicated team in place to implement these requirements. The Chief Information Officer (CIO) is accountable for this.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Reported cases of rejected Clients and Customers</p>
<b>Political, Associations, Lobbying, or other spending</b>	<p><b>(Internal) Group Financial Crime Prevention Policy</b></p> <p><b>Statement:</b> The Group prohibits any donations or funding provided to charitable or political organisations. Any exception to this policy must be subject to enhanced due diligence and escalated to the Group FCC or Compliance for approval. This does not apply to the internal ESG community programmes.</p> <p>The Group does not provide funding for Trade Associations or Lobbying.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Total spend on Political Associations, Trade Associations, or Lobbying</p>
<b>Environment</b>	<p><b>(Internal) Group Environmental Management Policy</b></p> <p><b>Statement:</b> The Group integrates Environmental, Social and Governance (ESG) standards into everything, guided by its values of integrity, collaboration, client focus and impact. The Group's strategy aligns to the UN Sustainable Development Goals, of which Climate Action (SDG 13) is core under our strategy, where we contribute to a thriving and resilient planet. The purpose of our Environmental Management policy is to set out the high-level approach to identifying and managing environmental risk and management systems, which have an impact on the Group.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Total GHG emissions (Scope 1, 2 and 3) and Head Office Waste (Hazardous, Recycled, Landfill, and other)</p>
<b>Social Responsibility</b>	<p><b>(Internal) Group Social Responsibility Policy</b></p> <p><b>Statement:</b> The purpose of this Policy is to outline all measures, governance, procedures, and definitions for the following: Matched Charitable Giving, Funding for Charity Events, Requests for Internal/External events, Charitable Partnerships, Fund Distribution, Volunteering Definitions, Sponsorships, and Social Impact Metrics.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Total ESG Community Engagement (Donations, Matched Charitable Giving, Volunteering Hours, and Employee Fundraisers)</p>
<b>Discrimination</b>	<p><b>(Internal) Inclusive Workplace Policy</b></p> <p><b>Statement:</b> This policy sets out our approach to maintaining an inclusive workplace for all, and the avoidance of discrimination at work. It applies to all aspects of employment, including recruitment, pay and conditions, training, performance appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Employee DEI Metrics (% of female FTEs, % of female senior management, % of Ethnically Diverse FTEs, % of Ethnically Diverse Senior Management)</p>
<b>Occupational Health &amp; Safety</b>	<p><b>(Internal) Group Occupational Health &amp; Safety Policy</b></p>

	<p><b>Statement:</b> Our Occupational Health &amp; Safety policy ensures a safe and healthy work environment by managing risks, complying with regulations, and promoting employee well-being. Through proactive measures and accountability, it supports workplace safety, regulatory compliance, and corporate responsibility.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> 1. Reported cases of Health and Safety breaches, 2. Reported cases of Employee Sick Leave 3. Whistleblowing</p>
<b>Freedom of Association</b>	<p><b>(Internal) Group Social Responsibility Policy</b></p> <p><b>Statement:</b> While the Group is not legally required to have Social Bargaining, Freedom of Association or Collective Bargaining Policies, we fully respect and enable our Employees' legal rights in these areas. The Group is committed to an open, inclusive environment where Employees can freely express their views, raise concerns, collaborate with management. The Group supports the principle of freedom of association and ensure that Employees are not subject to retaliation for exercising their rights in accordance with applicable labour laws and regulations.</p>
<b>Human Rights</b>	<p><b>(External) Group Modern Slavery Statement <a href="#">(Link)</a></b></p> <p><b>Statement:</b> The Group is committed to respecting and promoting human rights across our operations, recognising our responsibility to mitigate and address any potential human rights impacts. We are dedicated to upholding the highest ethical standards and ensuring that our business practices fairness, dignity, and respect for all individuals.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Reported cases of Whistleblowing (Human Rights Related)</p>
<b>Financial Inclusion</b>	<p><b>Statement:</b> Through our business activity of moving money where it's needed, we ultimately contribute towards financial inclusion and making a positive social impact. The Group can trace its history back at least 200 years and has become a vital part of a financial support eco-system. The Group facilitates billions (GBP) of currency flows to developing economies to support humanitarian aid, financial inclusion, and remittance flows.</p> <p><b>(Internal) Group Social Responsibility Policy</b></p> <p><b>Statement:</b> In accordance with tracking our financial inclusion and global ESG advocacy the Group reports Social Impact Metric KPIs annually.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Social Impact Metrics KPIs – 1. Emerging Market Volumes, 2. Development Aid Flows, 3. Remittance Flows into Emerging Markets, and 4. Number of Currencies Offered</p>
<b>Third Party Verified GHG Data</b>	<p><b>(Internal) Group Environmental Management Policy</b></p> <p><b>Statement:</b> All tracked greenhouse gas (GHG) emissions data is verified annually by an independent third party to ensure accuracy and compliance. The verification and assurance includes Energy, Scope 1, Scope 2, and Scope 3).</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Reasonable Assurance Report Provided Annually</p>
<b>Cybersecurity and Governance</b>	<p><b>Data Protection and Management Policy and Cyber Security Policies</b></p> <p><b>Statement:</b> <i>The Group has the following internal policies that all relate to Cyber Security:</i> Data Protection and Management, Acceptable Use, Backup, Cloud Security, Data Classification and Handling, Information Security, Logging and Monitoring, Physical and Environmental Security, Secure Software Development Lifecycle Management, Vulnerability and Patch Management, Access Management, Outsourcing and Third-Party Risk Management.</p> <p>The Group is Cyber Essentials Certified.</p> <p><b>Reportable Measures, Metrics, KPIs:</b> Reported cases of Data Breaches, Cyber Security Incidents, Users Impacts by Data Breaches, Percentage of data breaches that involved personally identifiable information</p> <p><b>Cybersecurity Executive Owners: Richo Strydom – CTO</b></p>

### Statement for Internal Policies:

The Group does not share/ publish all policies externally as these are classified as confidential documents that may contain Information that if disclosed, could have a significant adverse effect on the Bank, its customers, or partners. It is recognised that the Bank, in pursuit of its business objectives, may be requested during a tendering process, to share policies to strengthen the application process. The Group therefore permits a selection of policies to be shared with applicable Government Agencies on request. If other third parties require sight of the Banks policies and the Bank agrees, this can be facilitated in the London Bridge Offices via an in-person meeting, where hard copies of policies can be made available in a controlled environment.

Version	Updated By	Approved Date	Approved by
v1	Charlie Bronks	27 <sup>th</sup> March 2025	Clare Davies
v2	Charlie Bronks	21 <sup>th</sup> July 2025	Clare Davies