

Barclays Statement on Bribery and Corruption

Introduction

Barclays takes a zero-tolerance approach to bribery and corruption and we are committed to conducting our global activities free from any form of bribery and corruption. We also expect the same from any third parties providing services for or on behalf of Barclays. The Barclays Anti-Bribery and Anti-Corruption (ABC) Policy and Standards and the Barclays Introducer Policy and Standard extend to all Barclays' business dealings globally, and they are supported and endorsed by the Barclays Board of Directors, which has ultimate responsibility for their implementation. Our ABC Policy and our Introducer Policies are designed to help Barclays and its employees comply with the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act. Colleagues must also comply with their local anti-bribery and anti-corruption legislation.

Barclays ABC Policy and Standards

The Barclays ABC Policy and Standards apply to all Barclays employees, and are designed to ensure that Barclays employees know how to identify and manage the legal, regulatory and reputational risks associated with bribery and corruption.

Under the ABC Policy, Barclays employees are:

- Prohibited from offering, promising, providing, requesting, accepting or agreeing to receive anything of value (directly or indirectly) to or from any person or entity for the purpose of:
 - Improperly obtaining or retaining business or securing an advantage; and/or
 - Inducing the recipient to perform his/her role in breach of an expectation of good faith, impartiality or trust.
- Prohibited from improperly offering, promising or transferring anything of value to a public official (directly or indirectly) in order to: influence the public official in the exercise of their public functions; obtain or retain business for Barclays; or secure an advantage for Barclays, its employees or any other entity or person.

Consistent with this, Barclays employees are:

- Prohibited from making facilitation or “grease” payments, even if this represents local practice or custom;
- Prohibited from providing employment or other work opportunities (e.g. internships or work experience) to ‘connected’ individuals (e.g. individuals with a close family connection to an important client) in order to improperly obtain or retain business or secure an advantage;
- Required to carry out appropriate due diligence on third parties before engaging them to perform services for or on our behalf and to include appropriate ABC clauses in contractual arrangements with such third parties;
- Prohibited from offering/giving/accepting gifts or entertainment to or from third parties unless this is permitted by the Barclays Gifts and Entertainment Policy and the relevant local business policy and/or standard;
- Prohibited from making any political contributions on Barclays behalf. (Barclays is an apolitical organisation and donations (financial or in kind) to political parties, individuals or campaigns are not permitted. Any exception is a matter for consideration by the Board of Barclays PLC;

- Required to adhere to our internal requirements regarding: escalation of ABC issues and concerns; timely reporting of suspicions of, or attempts at, bribery and corruption; and suspected or actual breaches of the ABC Policy and Standards.
- Required to complete mandatory ABC awareness-raising training and any role-specific ABC training as and when assigned.

The ABC Standards contain the minimum controls requirements that Barclays employees must follow in order to comply with the policy. The Standards provide more detailed requirements regarding, amongst other things, how to deal with facilitation payment requests, gifts & entertainment, charitable donations/community investments, commercial sponsorship, political donations, lobbying, third party relationships and mergers & acquisitions.

Barclays Introducer Policy

In addition, due to the particular bribery and corruption risks associated with third parties who are engaged to generate or retain business or secure a business benefit for Barclays, we have a standalone Introducer Policy and Standard. Third parties who are defined as “introducers” by Barclays include senior advisers, lead generators, and certain financial advisers. The Introducer Policy and Standard are designed to protect Barclays against bribery and corruption risks, system and controls risks, reputational risk and wider legal and regulatory risks associated with these relationships. The Introducer Policy and Standard require employees to risk rate and conduct due diligence on Introducers, obtain approvals for Introducers, and include ABC-related contract clauses in written agreements with Introducers. In addition, the Policy and Standard set out an employee’s responsibilities for the on-going management of Introducer relationships, including how to escalate breaches of the Policy and/or potential Introducer-related misconduct.

Consequences of Failing to Comply with the ABC and Introducer Policies

Employees are made aware that a failure to comply with the requirements of our ABC or Introducer Policies and Standards may lead to disciplinary action, up to and including dismissal or termination of employment.