

## FURNESS BUILDING SOCIETY

### BRIBERY POLICY STATEMENT

It is our policy to conduct all of our business in an honest, lawful and ethical manner.

We take a zero-tolerance approach to bribery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective procedures and systems to counter bribery.

The Board of Directors recognises that the business benefits of rejecting bribery include business and customer confidence and reputation. The Board is therefore committed to stamping out bribery conduct and Furness Building Society's anti-bribery regime (which includes a Bribery Policy) are fully supported at the highest level.

We will uphold all laws, including the Bribery Act 2010, in respect of our conduct by implementing procedures based upon an assessment of the bribery risks to our business and endorsing the Bribery Policy. The Bribery Policy applies to all Furness Building Society Group employees (staff, contract and temporary) and to all business through contractual dealings with third parties and associates. The Bribery Policy will be displayed on Furness Building Society's website, and, where applicable, communicated to our business partners.

Responsibility for compliance with the Bribery Policy rests ultimately with the Board. The Bribery Policy should be read in conjunction with related policies including updated policies on Conflicts of Interest and Whistleblowing.

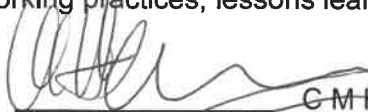
Performance will be reported to the Board annually by the Chief Executive in order that the Board can monitor the effectiveness of the anti-bribery regime. An update will also be provided on a quarterly basis to the Audit Committee.

Responsibility for the implementation of the Policy lies with the Chief Executive who will ensure an adequate programme of risk awareness and training exists to ensure that all staff, management and Non-Executive Directors are aware of corporate liabilities and personal responsibilities for bribery conduct and act promptly if they become aware of an actual or potential violation. The Compliance and Audit functions will include bribery in the scope of their work and will carry out a level of testing appropriate to the risk involved to provide additional assurance to the Board.

We require all employees to co-operate in the implementation of the Bribery Policy and not to violate the anti-bribery procedures. Any breach constitutes a disciplinary offence and may amount to gross misconduct. There are various means for staff and business partners to report any concerns they might have, if need be anonymously including through internal whistleblowing.

The Bribery Policy and procedures will be reviewed and updated periodically to reflect changes in working practices, lessons learnt and changes in legislation.

Signed



C M Harrison, Chief Executive

Dated

20 May 2019