



## Statement on RBC's Anti-Bribery and Anti-Corruption Policy

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The Royal Bank of Canada and its subsidiaries (collectively, "RBC") are committed to maintaining the highest level of professional and ethical standards in the conduct of all of its business affairs and places the highest importance upon its reputation, honesty and integrity.

RBC is committed to remain in full compliance with all Anti-Bribery and Anti-Corruption (ABAC) laws and regulations in the jurisdictions in which RBC operates. RBC's staff and associated persons are prohibited from engaging in bribery and corruption; failing to do so may result in disciplinary action(s), including termination.

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### ***Anti-Bribery and Anti-Corruption Policy***

RBC has developed an enterprise-wide ABAC policy that sets out minimum standards to be followed by RBC. The ABAC policy incorporates the requirements from all applicable ABAC laws and regulations, including the Canadian Corruption of Foreign Public Officials Act, US Foreign Corrupt Practices Act and UK Bribery Act.

The ABAC policy prohibits RBC units, employees, contract workers, officers and directors and any third party acting on behalf of RBC from ordering, authorizing, assisting, giving or receiving an offer, gift, payment, authorization of payment, "item of value", excess hospitality, or the promise of any of these items with the intent of assisting RBC in obtaining an unfair advantage, or causing a person to act or not to act with the corrupt intent of obtaining or retaining business, or directing business to any person, either directly or indirectly, including but not limited to a Public Official. Under no circumstances may an RBC employee provide, offer or promise to provide, or approve a request to offer or provide, any Facilitation Payment.

### ***Anti-Bribery and Anti-Corruption Program***

RBC maintains a comprehensive ABAC program to manage bribery and corruption risk. RBC's ABAC program consists of:

- Policies and procedures, including an enterprise-wide ABAC policy and policies that cover, but not limited to, the management of third parties, conflict of interest, and charitable donations;
- The identification, assessment, communication and maintenance of applicable regulatory requirements, including emerging risks that have the potential to affect bribery risk or related risk exposure to RBC;
- Risk assessments to identify areas with increased inherent risk of bribery and corruption to design and enable controls to mitigate those risks;
- The RBC Code of Conduct, which provides employees awareness of the broad principles to combat bribery and corruption;
- Additional bribery and corruption-specific training provided to employees of business and functional units (including contract workers) deemed at higher risk and exposure to potential acts of corruption, or where a regulatory requirement is in place;
- Points of escalation, incident management processes and reporting including a confidential whistleblower hotline;
- Monitoring and testing of (i) procedures to ensure adherence to controls; (ii) evaluation of the effectiveness of those controls and the ABAC policy; and (iii) material exposure to regulatory risk;
- Reporting and oversight functions capable of providing sufficient, pertinent and timely reports to Senior Management and the Board of Directors regarding regulatory risk management effectiveness; and
- Maintenance of adequate documentation to demonstrate how ABAC regulatory compliance risk is managed.

On a regular basis, RBC participates in ABAC professional forums to keep informed of relevant developments, enhance ethical practices and monitor international and industry standards. RBC is an active member of a globally recognized non-profit international business association dedicated to ABAC.