



Whistle blowing procedures and standards

Stanbic IBTC takes its commitment to its values, business principles, ethical and legal behavior seriously. For this reason, we have made the reporting of unethical or illegal behavior as well as breaches of our values and business principles easy to do.

What can be reported?

Valid concerns regarding the following can be reported:

- Conduct which is inconsistent with the Bank's stated vision and values, its code of ethics and policies and procedures, as they may be published and communicated from time to time;
- Violation of law;
- Abuse of company resources and assets;
- Danger to the health and safety of any individual; and
- Deliberate concealment of information.

Who can raise a concern?

Anyone who has a reasonable belief that there is an incident or impending incident which relates to any of the matters specified above, may raise a concern.

Concerns must be raised without malice, in good faith, not for personal gain and the individual must reasonably believe that the information disclosed, and any allegations contained in it, are substantially true. The issues raised may relate to a member of staff, or a group of staff, customers, contractors or vendors.

How are concerns raised?

The Bank wishes to assure the safety of whistle blowers and therefore undertakes to treat all whistle blowing reports as confidential. The choice between the selections of “**confidential**” or “**anonymous**” whistle blowing is that of the whistle blower alone.

What is anonymous whistle blowing?

Alternative to confidential reporting, a whistle blower may choose not to reveal his or her identity. The Bank has established a whistle blowing hotline which employees may use to report concerns. The hotline is managed by an independent third party audit firm (KPMG).

The systems of the audit firm are set up in such a way that electronic reporting is *non-traceable* through devices such as caller ID, and contractually, the audit firm is not permitted to divulge the identity of the caller to the Bank (in the event that it becomes aware of the caller's identity).

The anonymity advantage to the reporter is counter-balanced by the disadvantage to the Bank's financial crime investigation, in that it reduces the ability of the investigator to get further information relating to the allegations from the whistle blower. The anonymous whistle blower should be careful not to reveal his or her identity to a third party.

Whistle blowing contact details:

Email: fraud@kpmg.co.za and fraud@stanbicibtc.com

Phone: +234 (1) 271 7739 and +234 (1) 422 7777

Whistle blowing contact details for the Central Bank of Nigeria (CBN):

E-mail: anticorruptionunit@cbn.gov.ng