

Whistle-blowing policy

1) Introduction

This policy is introduced in furtherance of the aim of improving corporate governance in the bank. It is also aimed at fulfilling part of the requirements of the Central Bank of Nigeria's code of corporate governance. Whistle-blowing enables an organization to obtain early warning signals on what may be going wrong in the organization, especially in cases where it would be difficult to use formal communication channels. This is important where the issues involved are very sensitive and would require the confidentiality of the whistle blower. In other words whistle-blowing is a confidential channel open to all the stakeholders of the bank to report any wrongdoing to the management and board of the bank.

2) What should be reported?

- 2.1 Fraudulent activities
- 2.2 Illegal activities
- 2.3 Bribery and corruption
- 2.4 Gross misuse of bank's assets including information asset
- 2.5 Conflict of interest and abuse of office on the part of any member of staff or director
- 2.6 Activities likely to endanger life or property
- 2.7 Insider dealings
- 2.8 Use of fake/forged certificates
- 2.9 Theft/leakage of information assets
- 2.10 Purchase of goods at inflated prices
- 2.11 Purchase of inferior goods
- 2.12 Concealment of any malpractice
- 2.13 Override of controls
- 2.14 Abuse of authority
- 2.15 Sexual harassment
- 2.16 Other unethical activities

3) Who should report?

- 3.1 Employees
- 3.2 Directors
- 3.3 Clients
- 3.4 Vendors and service providers

4) Procedure for making whistle-blowing reports

4.1 All whistle-blowing reports should be made using the KPMG Ethics Line. The telephone lines and email address are given below:

- Toll free numbers for calls from MTN numbers only:
 - 0703-000-0026
 - 0703-000-0027
- Toll free numbers for calls from Airtel numbers only:
 - 0808-822-8888
 - 0708-060-1222
- Toll free number for calls from 9mobile numbers only:
 - 0809-993-6366
- Toll free number for calls from Globacom numbers only:
 - 0705-889-0140

Email: kpmgethicsline@ng.kpmg.com

Web link: <https://apps.ng.kpmg.com/ethics>

Whistle-blowing reports can also be sent direct to the CBN using the email address anticorruptionunit@cbn.gov.ng

4.2 The following procedure should apply for all telephone reports.

- Step One
 - Dial the hotline from any telephone of your choice
 - You may call anonymously. Even if you decide to supply your name, your identity will remain confidential and will NOT be disclosed to FSDH except with your consent
 - The call operators are not employed by FSDH, thus ensuring that your confidentiality is maintained at all times

- **Step Two**
 - When you call, the call operator will interview you to obtain as much information as possible
 - Ensure you provide all the details
 - Nature of the incident
 - People involved
 - Dates of incident
 - Place of occurrence
 - How the incident occurred
 - Any other useful information

- **Step Three**
 - You will be given a reference number (PIN). Keep this confidential as you will need this number if you make a follow-up call
 - You may call back for feedback on your report or to provide additional information
 - KPMG Ethics Line will not call you back since it does not know your identity.

- **Step Four**
 - All information received is captured onto a call sheet memorandum for direct transmission to designated persons within FSDH for further action.
 - Calls are toll-free provided they are within the same network

4.3 Reports sent through e-mail address

- You may decide to send your report through the designated email address in paragraph 4.1.
- You should also ensure that you provide all the details required in paragraph 4.2 (Step two)

4.4 Feedback

If you desire, KPMG will give you feedback if you call back (for reports via phone) or through your email address (for reports sent via email)

5) Protection for whistle-blower

- 5.1 Whistle-blowing is done through KPMG's Ethics Lines. KPMG is a reputable international firm.
- 5.2 FSDH does not have access to the whistle-blowing reports ensuring that the whistle-blower is fully protected.
- 5.3 Calls are answered by trained personnel who understand the concerns of the whistle-blower and will ensure that all the relevant facts are obtained from the whistle-blower in a manner that will ensure full protection and confidentiality for the whistleblower.
- 5.4 You are not required to disclose your identity. Even if you disclose your identity to KPMG, your identity will not be disclosed to FSDH without your consent.
- 5.5 The facilities are secure and not accessible to unauthorized persons

6) Obligation of the whistle-blower

In making whistle-blowing reports, the whistle-blower should ensure that:

- 6.1 The report is made in good faith
- 6.2 He or she has reasonable ground to believe that the report is true. The whistle-blower is encouraged to report even if he or she does not have all the relevant information.
- 6.3 He or she is not making the report for personal gain.

7) What happens after the report?

- 7.1 The issues will be thoroughly investigated, using all available evidence. The whistle-blower may be called upon, if the report is not anonymous, to provide in strict confidence any available evidence necessary to confirm all the issues raised in the report.
- 7.2 Regular feedback will be provided to the whistle-blower if he or she calls back for feedback. If the report is through an email address, feedback will be provided by KPMG using that same email address
- 7.3 Where the allegations are confirmed, the bank undertakes to take necessary disciplinary measures against identified offenders in line with the bank's policy. Where injuries have been suffered by the whistle-blower, the bank undertakes to provide necessary remedies as may be permitted by the bank's policy.

8) Review of the Whistle Blowing Policy

- 8.1 Review of the whistle-blowing policy will be conducted biennial basis.