



Personal Account Trading Policy

The Stanbic IBTC Holdings PLC (“Stanbic IBTC”) Personal Account Trading Policy is designed to comply with applicable statutory and regulatory obligations across Stanbic IBTC, ensuring that;

- Conflict of Interests are managed fairly as between Stanbic IBTC, its Employees and its Clients
- Business is conducted in line with industry standards and relevant regulatory requirements
- Stanbic IBTC and its Employees avoid the sanctions which may result from the misuse of Stanbic IBTC and/or Client information which is deemed to be material non-public information (“MNPI”) within the scope of any relevant Market Abuse regulatory framework;
- There are adequate, established, implemented and maintained controls for Personal Account Trading (“PAT”).

The PAT policy covers the following requirements:

- All employees of Stanbic IBTC must ensure that all their Personal Trading Accounts are disclosed. Disclosure of PATs must be made by new employees upon joining Stanbic IBTC at on-boarding.
- All employees are required to annually review and re-affirm the accuracy of and amend where necessary their PAT declaration each year.
- All employees are required to ensure that they adhere to all trading restrictions imposed by Stanbic IBTC.
- All employees must conduct PAT in a manner that adheres to the rules and regulations of markets and exchanges where such PAT activity is conducted.
- All employees are subject to the embargo periods and are prohibited from trading in Stanbic IBTC relevant assets during the embargo period.
- All employees must not whether directly or indirectly conduct PAT in a relevant asset in relation to which the employee has access to MNPI.



- All employees must not make recommendations or otherwise seek to influence the trading activity of others whilst in possession of MNPI.