



# Stanbic IBTC Whistleblowing Policy Statement

## Introduction

Stanbic IBTC Holdings PLC otherwise known as “Stanbic IBTC” or “the Company” is committed to establishing a culture of integrity, transparency, openness and compliance, in accordance with the values and Code of Ethics adopted by the Company.

The Whistleblowing Policy provides for the protected disclosure of any attempted, suspected or actual and /or unlawful, irregular or unethical behaviour that the whistleblower comes across in the Company in line with the Guidelines for whistle blowing for Company’s and other Financial Institutions in Nigeria (May 2014), by providing a framework for employees and other stakeholders to report their concerns internally at the Company or externally.

## Scope

Whistleblowing is intended for employees, management, directors of the Company and other stakeholders. This Policy also applies to Whistleblowing disclosures made by non-employees or external parties to the Company.

## Protection

The Company will protect a whistle blower who makes a Whistleblowing report, from being victimized or suffering prejudice for making the report, provided that:

- the whistle blower makes the report in good faith;
- it is reasonable for the whistle blower to make the report;
- the report is made on the basis of a reasonable belief that it is true;
- the report is not made for personal gain, except if any reward is payable in terms of any law;
- the report is made in accordance with this Policy

## Anonymity

The Company allows for anonymous Whistleblowing reporting of wrongdoing in the Company. However, the following factors would be considered before investigating anonymous reports:

- The Seriousness of the issues;
- The significance and credibility of the concern; and
- The possibility of confirming the allegation

Note that the Company cannot protect a whistle blower who remains anonymous.

The Company is not obliged to protect a whistle blower against prejudice in the workplace, who in bad faith or maliciously makes a false report, or who unfairly or unjustly dishonours another. Appropriate disciplinary action will be taken, in these cases.



## **Investigation**

The Company ensures that all Whistleblowing reports made in terms of this Policy are reviewed and investigated where appropriate.

## **Reporting Channels**

Whistleblowing reports can be made internally to the Company, through any of the following Whistleblowing channels:

- 234 (1) 4227777 or 234 (1) 2717739
- [whistleblowingline@kpmg.co.za](mailto:whistleblowingline@kpmg.co.za)