

Whistle Blowing Policy

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DEFINITIONS AND ABBREVIATIONS

NSE	The Nigerian Stock Exchange
RMBNS	Rand Merchant Bank Nigeria Stockbrokers Limited
AML/CFT	Anti-Money Laundering/Combating Financing of Terrorism
KYC	Know-Your-Customer
ARCCOM	Audit, Risk and Compliance Committee
SEC	Securities & Exchange Commission
CSCS	Central Security Clearing System
BOD	Board of Directors
Zanibal	RMBNS Stockbroking application
ATS	Automated Trading System
MD/CEO	Managing Director/Chief Executive Officer
CSCS	Central Security Clearing System

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POLICY STATEMENT

Rand Merchant Bank Nigeria Limited ('RMBN' or 'RMB Nigeria' or 'the Bank') actively encourages its employees to embrace its values, especially in respect of upholding the highest levels of integrity. Consequently, the Bank's employees are obliged to report any unlawful, irregular or unethical conduct that they observe.

The Bank is also required by the CBN's Guidelines for Whistle-Blowing 2014 to have a whistle-blowing policy that includes the provision of dedicated hotlines.

The Bank will apply the highest standards of accountability and corporate governance in response to cases of whistle-blowing.

The Bank's whistle-blowing policy provides for the following:

- Where an employee discovers information, which s/he in good faith believes shows wrongdoing within the Bank, it should be disclosed without fear of reprisal;
- No employee shall be disadvantaged when reporting legitimate concerns;
- The Bank undertakes to protect the identity of any employee who in good faith makes a report in accordance with the procedures set out in this policy; and
- The Bank will not protect the identity of any employee who maliciously makes false reports and appropriate disciplinary action will be taken in such cases.

The Bank's whistle-blowing policy is not intended to be used to report petty disputes, grievances, false or misleading disclosures, matters currently under disciplinary enquiry and matters already pending before the courts.



POLICY CONTEXT AND SCOPE

1. WHAT IS WHISTLE-BLOWING?

To blow the whistle on someone is to alert a third-party that someone has done, or is doing, something wrong.

So 'whistle-blowing' essentially means that you alert others of misconduct.

You can also blow the whistle when you know that someone is planning to do something wrong thereby preventing the incident.

2. WHAT IS THE PURPOSE OF THE WHISTLE-BLOWING POLICY?

2.1. Protecting RMB Nigeria's duty of trust

As set out in the FirstRand Group Code of Ethics, RMB Nigeria (a subsidiary of the FSR Group) is committed to a policy of fair dealing and integrity in the conduct of its business.

This commitment rests on the fundamental belief that business should be conducted honestly, fairly and within the framework of applicable laws.

We need to proactively protect funds and resources under our custodianship from abuse or misdirection. Furthermore, our employees deserve to work for an organisation espousing, and acting upon, the highest ethical values.

Thus, reporting misconduct by blowing the whistle is an act of care and loyalty to our fellow employees, shareholders and other stakeholders.



2.2. Purpose of the whistle-blowing policy

The purpose of the RMB Nigeria whistle-blowing policy is to:

- 2.2.1 Clarify what types of misconduct are reportable;
- 2.2.2 Communicate and give assurance of RMB Nigeria's commitment to protected disclosures;
- 2.2.3 Give assurance that RMB Nigeria and the FirstRand Group will do everything in its power to ensure that people who report misconduct in good faith are not retaliated against or victimized;
- 2.2.4 Inform employees of the various ways of making a protected disclosure and to give clarity on these processes; and
- 2.2.5 Indicate what RMB Nigeria and the FirstRand Group's responsibilities are when alerted to misconduct.

3. WHISTLE-BLOWING PROTECTION

RMB Nigeria shall treat all disclosures resulting from whistle-blowing in a confidential manner; both confidential and anonymous whistle-blower identity shall be kept confidential.

Safety is a concern because those who benefit from misconduct may attempt to retaliate against or victimize a whistle-blower for loss, or potential loss, of that ill-gotten gain.

However, importantly:

- Such adverse consequences can only materialise if the identity of the whistle-blower is known through a breach of confidentiality; and
- An anonymous whistle-blower cannot be victimised, provided that the whistle-blower also protects his or her own anonymity.

A good faith report is made by a whistle-blower who believes the report to be true and relevant to the interests of the Bank.



RMBN maintains the necessary internal systems and procedures to protect the interests of whistle-blowers. In addition to this, the Banks and Other Financial Institutions Act 1991 (Section 60) ('BOFIA') provides the sanctionable offences for banks that contravene the provision of the guidelines.

These guidelines only apply to employer–employee relationships. In other words, you are only protected under the guidelines if you are directly employed by the organization in which you blew the whistle. If you are an independent contractor, the current law will not protect you. RMB Nigeria and the FirstRand Group, however, assure you that we will not act against anyone.

Stakeholders are encouraged to disclose their name when filling reports to make their reports more credible and the identification will be confidential for the purpose of the whistle-blowing. Confidentiality here means that the person providing advice will know your identity when you seek advice, but will not make your identity known to anyone else without your permission, unless there is an over-riding legal or ethical obligation to do so.

Anonymous disclosures may be considered on a discretionary basis, taking into account:

- **The seriousness of the issues**
- **The significance and credibility of the concern; and**
- **The possibility of confirming the allegation.**

According to the CBN guidelines, an employee who reports in good faith may take appropriate legal action if they are subjected to any 'detriment' due to blowing the whistle.

Issues that could amount to 'detriment' are listed by the Bank as being:

- i. Dismissed, suspended, demoted, harassed or intimidated;
- ii. Transferred against their will;
- iii. Refused transfer or promotion;
- iv. Subjected to a term or condition of employment or retirement that is altered or kept altered to his or her disadvantage;
- v. Refused a reference, or being provided with an adverse reference; and
- vi. Denied appointment to any employment, profession or office.



4. WHO SHOULD BLOW THE WHISTLE?

Anyone, but especially employees, management, directors, depositors, service providers, creditors and other stakeholder(s) in RMB Nigeria and all regions in which FirstRand operates, who know of misconduct associated with RMB Nigeria and FirstRand Banking activities, or who has reasonable grounds for inferring misconduct is strongly encouraged to report this, using his or her preferred reporting option (see Section 7).

POLICY PROVISION

5. WHEN SHOULD ONE BLOW THE WHISTLE?

Misconduct is reportable when it has taken place, is taking place, or is reasonably likely to take place. Harm to RMB Nigeria, the FirstRand Group and its stakeholders may occur when any misconduct is unchecked or unaddressed. The sooner misconduct is reported, the greater the chances of mitigating any possible damage.

Importantly, in determining whether to report misconduct, harm is not only measured in terms of resources lost, or damage to a particular programme or initiative, but harm may also be done to the integrity and reputation of RMB Nigeria and the FirstRand Group.

Reportable conduct falls into the following categories:

5.1 Illegal or unlawful conduct

Conduct may be illegal or unlawful in terms of the laws of the Federal Republic of Nigeria, the Republic of South Africa, other applicable countries, and international law. Criminal offences such as theft, fraud, corruption (for example, bribery), or money laundering fall into this category and should be reported.

5.2 Unprocedural conduct

Conduct may be unprocedural when it violates any policies, procedures, rules or regulations of RMB Nigeria and the FirstRand Group or those of any other party that impact on its operations. It is particularly important to highlight those rules and processes that guide accounting practices and control financial reporting, auditing matters, and the like.



These procedures are important for good governance, and breaching them may expose RMB Nigeria, the FirstRand Group and its stakeholders to the risk of loss or to real loss.

5.3 Other forms of unethical conduct

The FirstRand Group Code of Ethics provides guidance as to what the Group considers ethical and unethical. This code does not cover all unethical actions and if you believe that an activity is unethical, in other words, it goes against our RMBN and FirstRand values, then you should report this or obtain advice on the matter.

However, not all forms of unethical conduct should be reported using the whistle-blowing channels. For example, some kinds of conduct may be disrespectful, and therefore undesirable, without harming any serious interests other than personal feelings. For this type of conduct, it is recommended that employees refer to the Human Resource (HR) manual and, more specifically, to the Grievance Policy and Procedures.

5.4 Wasteful conduct

Conduct constituting a gross waste of resources is a reportable category in its own right since responsible stewardship of resources is crucial to the success of RMBN and the FirstRand Group. All individuals in the service of RMB Nigeria have an obligation to ensure that resources are used prudently and efficiently.

If resources were spent in a wasteful manner, and in breach of the trust under which they are provided to RMB Nigeria, the FirstRand Group and its members, this would be reportable under the whistle-blowing mechanism.

The misconduct in the abovementioned categories could include many different types of activities. While it is not possible to list all these activities, we appeal to staff to be especially vigilant about the following issues:

- Actions detrimental to Health and safety or the environment
- Other forms of corporate governance breaches
- Insider abuses
- Non-disclosure of interest; and
- Attempts to conceal and suppress any information relating to any of the above.



RMB Nigeria and the FirstRand Group give assurance that we will not act against anyone who reports to us in good faith and can reasonably be believed to be true. A whistle blower will not be victimized or disadvantaged in any way by RMB Nigeria or by the FirstRand Group.

However, reporting in no way protects a whistle-blower from being subjected to legitimate disciplinary processes. In other words, blowing the whistle cannot be used to escape legitimate disciplinary processes.

According to the CBN guidelines, an employee who reports in good faith may take appropriate legal action if they are subjected to any 'detriment' due to blowing the whistle.

Issues that could amount to 'detriment' are listed by the Bank as being:

RMB Nigeria assures you that we will not tolerate retaliation against any person who makes reports in good faith.

POLICY APPLICATION

6. INFORMATION REQUIRED WHEN BLOWING THE WHISTLE

RMBN in conjunction with the FirstRand Group carry out formal investigations when we have reason to believe that improper acts have been committed. Please make your complaint as specific as possible and include the following details:

- i. The alleged wrongdoing that are you reporting;
- ii. Where and when (dates and times, if available);
- iii. Who was involved?
- iv. How the individual or firm committed the act; and
- v. Why you believe the activity is improper.

You will not be expected to prove the truth of an allegation. When reporting you will, however, need to show that you have sufficient grounds for your concerns.



7. HOW TO BLOW THE WHISTLE

There are various ways of raising a concern or blowing the whistle.

The avenue that you choose will depend on the seriousness of the misconduct you are reporting and which of the avenues you are most comfortable with.

7.1. Minor misconduct

In cases of minor misconduct (i.e. if it is not illegal or it does not pose significant potential damage to RMB Nigeria, the FirstRand Group or any of its stakeholders), you are encouraged to approach the offending colleague directly if this will resolve or prevent the misconduct. Guidelines and advice on how to go about this will be addressed in the training, education, communication and awareness programme relating to this policy.

You may also approach your direct line manager or any manager or senior manager in RMB Nigeria or the FirstRand Group who you trust. You can also approach the deployed compliance officer.

7.2. Serious misconduct and illegal activities

The FirstRand Ethics line is independently managed by Deloitte Tip-Offs Anonymous. Any serious misconduct or illegal activities can be reported in any of the following ways:

Nigeria: 07080601872

South Africa: 0800 00 33 12

United Kingdom: 0808 238 75 00

India: 000800 100 79 00

Email: report@firstrandethicsoffice.com

Web: www.firstrandethicsoffice.com



7.3. What is confidential whistle-blowing?

If you agree to the confidential disclosure of your personal details, then your name and contact details will be known to the Deloitte Contact Centre, the FirstRand Ethics office and the investigators that will conduct the investigation.

RMB Nigeria in conjunction with FirstRand assures you that it would not reveal the whistle-blower's identity to any third-party.

The only exceptions to this assurance may be where RMBN or the FirstRand Group must comply with a legal obligation to breach confidentiality, or when it is required to protect the direct and significant interest of the FirstRand Group.

The CBN encourages stakeholders (whistle-blowers) to disclose their name when filing reports to make their claims more credible.

An advantage for the RMB Nigeria and FirstRand Group of a confidential (as opposed to anonymous) report is that it is better placed to investigate the report since the whistle-blower can be contacted for further information if necessary.

If you decide to remain anonymous, you do not need to supply your name or any information that might reveal your identity. Nobody will ever know that you tipped us off. Unfortunately, this will also mean that we cannot contact you for more information if we need to.

7.4. What is anonymous whistle-blowing?

A whistle-blower may choose not to reveal his or her identity. Anonymous whistle-blowing is very safe, but it may make it difficult to investigate the facts.

Using the externally operated FirstRand Ethics Line is recommended for anonymous whistle-blowing. The whistle-blower must take care not to reveal his or her identity while making the report and must also be careful not to let anyone else know that they made the report.

If you choose to make an anonymous report to the whistle-blowing hotline, you will receive a reference number. You can call the hotline at a later date and be updated on the progress in the case by quoting this reference number.



7.5. What is partially anonymous whistle-blowing?

If you select to be partially anonymous, then your personal details will be known only to the Deloitte Contact Centre that manages this tip-off facility. At no time are these details divulged to RMB Nigeria and/or FirstRand. If needed, the Deloitte Contact Centre will contact you to obtain further information.

8. WHAT IF I NEED TO ASK ADVICE ABOUT THE INCIDENT?

You might be in a situation where you have knowledge of misconduct and would like to get more advice while considering whether you should blow the whistle. You could approach a senior officer in RMB Nigeria, a FirstRand manager, or the Group Ethics Officer. Be aware that they have an obligation to act in the best interest of the Bank and the FirstRand Group. If you give them information about misconduct involving the Bank or, the FirstRand Group, they have an obligation to report it.

For truly independent advice, you could speak to a lawyer in private practice. They give free confidential advice specifically on whistle-blowing.

However, you have an obligation to ensure that whoever you speak to keeps the matter strictly confidential and does not leak information to a third-party such as the media. If information is leaked outside of RMB Nigeria and the FirstRand Group before you have exhausted your options within the organisation, it will no longer be regarded as a protected disclosure.

9. MANAGER'S RESPONSIBILITIES

RMB Nigeria in conjunction with FirstRand Ethics is committed to investigating and addressing all cases of reported misconduct.

To this end, the whistle-blowing investigation procedures set out all the steps that are followed upon receipt of the report under the whistle-blowing policy. This procedure document also sets out the roles and responsibilities of the FirstRand Group Ethics Office, and that of others charged with investigation and follow-up.



All whistle-blower reports received using the channels prescribed within this policy are sent to the FirstRand Group Ethics Office.

In general, the FirstRand Group Ethics Office will not conduct detailed investigations but will rather order and classify reports for distribution to the appropriate departments such as Group Forensic Services or RMBN Head of Internal Audit.

Most importantly, the whistle-blower may seek follow-up information about an investigation of a report or any consequent action taken thereof. If the report was anonymous, the onus is on the whistle-blower to contact the FirstRand Ethics Line and provide the unique identity number.

The RMB Nigeria Internal Audit works with FirstRand Group to collect all relevant data on the whistle-blowing line, which will be used to improve its effectiveness. The Head of Internal Audit with FirstRand Ethics office shall review reported cases and recommend appropriate action to the CEO, and where the reported issues affect Executive Management, such issues shall be referred to the ARCC Board. The Board or CEO shall take appropriate actions to redress the situation within a reasonable time.

The Head of RMBN Internal Audit with FirstRand Ethics' office shall provide the Chairman of the Board Audit Committee (ARCC) with a summary of cases reported and the result of the investigation at each quarterly ARCC Committee meeting.

10. WHISTLE-BLOWING INVESTIGATIONS

10.1. Whistle-blowing investigation procedures:

- i. Upon receipt of a report from RMBN or any source, the FirstRand Group Ethics Office, or its agent (as in the case of using the externally operated Ethics Line), will establish a unique ID number for the source, and if reported by telephone, will inform the caller of the ID number. Reports from all sources will be logged by date and time received and a brief description of the nature of the reported misconduct.
- ii. The FirstRand Group Ethics Office with the Head of RMBN Internal Audit will review all reports and will determine whether there are grounds to undertake an investigation.
- iii. The FirstRand Group Ethics Office with the Head of RMBN Internal Audit will review all reports within 10 days of receipt. It may further carry out a preliminary investigation, if sufficient information is given, to assess the whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations, which fall within the scope of other procedures, will normally be referred for consideration under those procedures.



- iv. If further information is required and the report was confidential rather than anonymous, the investigator will contact the whistle-blower for further information.
- v. The action taken will depend on the nature of the concern. The matter raised may, among other possible actions, be:
 - Investigated internally;
 - Referred to the Nigerian Police Force or other relevant law enforcement agencies; and/or
 - Referred to the FirstRand Ethics Committee.
- vi. Some concerns may be resolved by agreed action without the need for investigation. In cases where the FirstRand Group Ethics Office with the Head of RMBN Internal Audit determine that an investigation is not warranted, the whistle blower, if their identity is known, will be informed.
- vii. In cases where numerous unwarranted or malicious reports are received from one person, the FirstRand Group Ethics Office, and the external operator of the FirstRand Ethics Line acting upon instruction from the FirstRand Group Ethics Office, may refuse to log reports from this person.
- viii. Where the FirstRand Group Ethics Office determines that retaliatory action has been taken against staff or others for disclosing information to, or cooperating with, investigators, these retaliatory actions will be investigated and reported for appropriate action.
- ix. Firm action will be taken against employees who make malicious reports i.e. who knowingly provide false information or make false accusations.
- x. All investigations will respect the rights of individuals and will be conducted with fairness and due process for all concerned. Unauthorized disclosure by the FirstRand Group investigators of information received may constitute misconduct for which disciplinary measures may be imposed.

10.2. Follow-up and reporting:

- i. RMB Nigeria and the FirstRand Group recognise that employees require assurance that their concerns have been properly addressed. However, the progression of investigations will be handled in a confidential manner and will not be disclosed or discussed with any persons other than those who have a legitimate right to such information. This is important to avoid damaging the reputation of suspected persons who are subsequently found innocent of alleged wrongful conduct, as well as the person making the report or blowing the whistle.
- ii. The FirstRand Group Ethics Office, in conjunction with RMB Nigeria, will give an update on the status or outcome of an investigation to the whistle-blower, if requested, without disclosing confidential information. An anonymous caller should initiate such an inquiry, citing the allocated ID number.

The RMBN Head of Internal Audit with FirstRand Group Ethics Office will periodically report to the Regulatory Risk Management Committee, the Ethics Committee and the Board/ Directors



Affairs Committee on the number of hotline reports made, the nature of the reported misconduct, and the result of the investigations.

- iii. RMBN Head of Internal Audit shall review reported cases from the FirstRand Group Ethics Office and recommend appropriate action to the RMBN CEO and, where issues affect executive management, these will be referred to the Board. The Board or CEO shall take appropriate action to redress the situation within a reasonable time.
- iv. The Head of RMBN Internal Audit shall provide the Chairman of the Board Audit Committee with a summary of cases reported and the results of the investigations.
- v. The Compliance office shall report all whistle-blowing activities in the Bank to the Central Bank of Nigeria on a quarterly basis as presented to the Board Audit Committee by the Head of Internal Audit.

11. CREATING AWARENESS

For the policy to be sustainable, RMB Nigeria will support it with a structured training, education, communication and awareness programme. It is the responsibility of all managers to ensure that all employees are made aware of the policy, and receive appropriate training and education with regard to it.

12. ADMINISTRATION

- i. RMB Nigeria in conjunction with the FirstRand Group Ethics Office is responsible for ensuring uniformity with the implementation of this policy.
- ii. RMB Nigeria, as a member within the FirstRand Group, has overall responsibility for the maintenance and operation of this policy. RMB Nigeria is, in turn, assisted by deployed compliance officers and Group Forensic Services in implementing the policy.
- iii. Parties with whom a complaint has been logged will maintain a record of concerns raised and the outcomes (but in a format that does not compromise confidentiality).
- iv. Advice and guidance on how matters of concern may be pursued can be obtained from the FirstRand Group Ethics Office.



13. ADDITIONAL INFORMATION

This policy has been developed to provide a framework to ensure compliance with the CBN Whistle-Blowing Guidelines 2014, BOFIA Act 1991 (as amended), and South African Protected Disclosures Act (26 of 2000), but it does not serve as an exhaustive list of all issues covered within the framework of the Act.

CBN whistle-blowing email address: anticorruptionunit@cbn.gov.ng

To download the CBN Whistle-Blowing Guidelines and BOFIA Act 1991, visit: <http://www.cbn.org.ng>

The website: http://www.psc.gov.za/docs/guidelines/PSC_odac_update.pdf contains a helpful guide to the Protected Disclosures Act.

To download the South African Act, visit: <http://www.info.gov.za/gazette/acts/2000/a26-00.pdf>

More information regarding the different types of protected disclosures provided for in terms of the Act can be obtained from the FirstRand Ethics Office, particularly in relation to the following further types of protected disclosures:

- Protected disclosure to a legal advisor;
- Protected disclosure to an employer;
- Protected disclosure to certain persons or bodies; and
- Generally protected disclosures.



13. DEDICATED CONTACTS FOR WHISTLE-BLOWING

RMB Nigeria Ethics Line toll-free numbers

- Toll-free number 8099937319
- Local number +234-708-060-1872
- report@firstrandethicsoffice.com
- www.firstrandethicsoffice.com

CBN whistle-blowing email address:

- anticorruptionunit@cbn.gov.ng

NSE whistle-blowing website address:

- [http://www.nse.com.ng/regulation/market-surveillance/x-whistle-\(whistleblowing\)](http://www.nse.com.ng/regulation/market-surveillance/x-whistle-(whistleblowing))

FirstRand Group Ethics Line toll-free numbers

- 0800 00 33 12 (South Africa)
- 0808 238 75 00 (United Kingdom)
- 000800 100 79 00 (India)
- 08099937319 (Nigeria)

RMB Nigeria E-mail

- report@firstrandethicsoffice.com

RMB Nigeria website

- www.firstrandethicsoffice.com