



# **ACCESS BANK PLC POLICY ON WHISTLE BLOWING**

April 2023

Risk Rating: Moderate

**RETURN THIS POLICY TO CONDUCT AND COMPLIANCE AFTER APPROVAL**



## DOCUMENT INFORMATION

### Document Owner

This document is owned by the undersigned. He is responsible for ensuring that the policy is reviewed in line with the requirements of the Policy Approval, Broadcast and Administration Policy.

Name	Role
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### Document History

Prepared By	Date	Version	Comment
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## **1.0 EXECUTIVE SUMMARY**

Whistle blowing refers to the practice of reporting wrongdoing or unethical behaviour in an organization. The purpose of the whistle blowing program is to encourage employees to disclose any malpractice or misconduct which they observe. The Whistle Blowing Policy is primarily for concerns where the interest of the Bank or its stakeholders is at stake. The policy is therefore fundamental to the bank's professional integrity. In addition, it reinforces the value the bank places on staff to be honest and respected members of their individual professions. More so, it is important to note that employees who report allegations of malpractice will be protected as confidentiality is key to the effective implementation of a whistle blowing program.

## **2.0 INTRODUCTION**

Whistle blowing refers to the practice of reporting wrongdoing or unethical behaviour in an organization. The purpose of the whistle blowing program is to encourage employees to disclose any malpractice or misconduct which they observe. More so, it is important to note that employees who report allegations of malpractice will be protected as confidentiality is key to the effective implementation of a whistle blowing program.

The Whistle Blowing Policy is primarily for concerns where the interest of the Bank or its stakeholders is at stake. The policy is therefore fundamental to the bank's professional integrity. In addition, it reinforces the value the bank places on staff to be honest and respected members of their individual professions. It provides a method of properly addressing bona fide concerns that individuals within the firm might have, while also offering whistleblowers protection from victimization, harassment, or disciplinary proceedings.

All employees are encouraged to raise genuine concerns about misconduct, malpractices, and unethical behavior at the earliest opportunity and in an appropriate way.

Access Bank has outsourced the complaint mechanism of the whistle blowing program to DELOITTE. The benefit of this is to engage an independent consultant so as to assure employees of confidentiality and protection from possible reprisal.

## **3.0 OBJECTIVES OF THE POLICY**

The objectives of this policy are:

- To support our corporate philosophy.
- To comply with the Central Bank of Nigeria Guidelines for Whistleblowing for Banks and Other Financial Institution in Nigeria.
- To encourage employees to confidently raise concerns about unethical violation of the bank's policies and breach of professional codes of conduct.
- To reassure the whistle blower of protection from possible reprisals or victimization if a disclosure has been made in good faith.
- To provide a transparent process for dealing with concerns.
- To regularly communicate to members of staff the avenues open to them.

#### 4.0 SCOPE OF THE POLICY

The Access Bank whistle blowing policy applies to employees, management, directors and other stakeholders such as contractors, shareholders, job applicants and the general Public in all locations where the bank operates in Nigeria and all of the Bank's subsidiaries.

#### 5.0 STAKEHOLDERS AND RESPONSIBILITIES

STAKEHOLDERS	RESPONSIBILITY
Conduct and Compliance	The CCCO receives whistle blowing complaints and monitors investigation outcomes for reporting to CBN quarterly and DELOITTE monthly. He also reports efficiency of Whistleblowing to the Board Risk Management Committee.
DELOITTE	Receive whistle blowing complaints from the public on wrongdoings and reports to the Bank for investigation and feedback.
CBN	Receive whistle blowing complaints from the public on misconduct by banks and its executives for investigation.
NDIC	Receive whistle blowing complaints from the public on misconduct by banks and its executives for investigation
Group Internal Audit	Conduct investigation of reported whistleblowing cases and provides feedback of outcome for reporting to CBN and DELOITTE. Also, they make a report to the Board Audit Committee of all whistleblowing investigation outcomes.
Legal	Handle legal issues for the bank on reported cases
Strategic Business Units	Report misconducts that should be whistle blown.
Customers	Report misconducts that should be whistle blown.
Executive Management	Implementation of whistleblower programme
Board of Directors	Approval of whistleblower program
All members of staff	Report misconducts that should be whistle blown.
Vendors and Contractors	Report misconducts that should be whistle blown.

#### 6.0 GENERAL PROVISIONS ON CONCERNS

6.0.1	What is a concern?	A concern includes a grievance or report of a suspected breach of law or group policy.
6.0.2	Am I obliged to report a concern?	<p>All employees and stakeholders are expected to promptly report concerns regarding:</p> <ul style="list-style-type: none"> <li>(i) violations or potential violations of applicable law, rule, or regulation, or breaches of applicable Policy, Standard or Procedure, including Violations or Breaches resulting from Misconduct as defined in this paragraph,</li> <li>(ii) behavior that is a departure from industry or other applicable standard of conduct (whether external or internal),</li> <li>(iii) breaches of Access Bank Code of Conduct or other ethical standard, or</li> <li>(iv) deliberate avoidance or manipulation of controls</li> </ul> <p>Employees need not determine the significance or severity of Concerns, rather, employees must escalate all Concerns,</p>

		<p>regardless of the level of severity.</p> <p>Escalation must never be a substitute for employees making decisions that they are authorized to make or for effective discussion and decision-making. In addition, employees can seek guidance from their managers, others in their management chain, or from supporting functions. These interactions are not considered “escalations” for purposes of this Policy.</p>
6.0.3	Will I be disadvantaged?	<p>You will not be disadvantaged for reporting a concern under this policy regardless of the outcome, provided you make the report in good faith.</p> <p>Each person who reports a concern under this policy is expected to act in good faith.</p> <p>Where a whistle-blower has been subjected to any detriment in contravention of the above, he/she may present a complaint to the regulator. This is without prejudice to the right of the whistleblower to take appropriate legal action.</p>
6.0.4	What happens after I report a concern?	<p>All concerns reported under this policy will be taken seriously. The way a matter is handled will depend on the type of concern raised.</p>
6.0.5	Will I get any feedback?	<p>As a general rule, you will be given feedback, subject to any privacy, confidentiality, or other legal considerations within 30 working days.</p>
6.0.6	Reporting Channels	<p>You can report a concern either by calling the Whistle blowing Ethics Channels provided by Deloitte below:</p> <p><b>Toll free hotline:</b> 0800TIPOFFS (0800 847 6337).  <b>Web Portal:</b> <a href="https://tip-offs.deloittemanagedsolutions.com.ng/">https://tip-offs.deloittemanagedsolutions.com.ng/</a>  <b>E-mail :</b> tip-offs@deloitte.com.ng.  <b>Mobile App:</b> Download Deloitte Tip-offs Anonymous App on Android or iOS devices.</p> <p>Or Using the Internal Whistle Blowing Hotlines provided by the Bank</p> <p><b>Telephone: +234(1)2712010</b>  <b>IP Phone:4160</b>  <b>Email: whistleblower@accessbankplc.com</b></p> <p>Or Using the CBN ethics line</p> <p><b>ethicsoffice@cbn.gov.ng</b>  <b>anticorruptionunit@cbn.gov.ng</b></p> <p>You can report a concern either by disclosing your identity or by remaining anonymous.</p>

## 6.1 TYPES OF CONCERNS TO BE RAISED

Employees and other stakeholders can raise concerns encountered in the workplace relating to a perceived wrongdoing. The bank considers such wrongdoing to include:

- Fraud, which means any act or omission, including a misrepresentation, that knowingly and recklessly misleads, or attempts to mislead, a party to obtain financial or other benefit or to avoid an obligation.
- Corruption, which means the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party.
- Misconduct, which means failure by Bank Personnel to observe the Bank's codes of conduct.
- Coercive practices, which mean impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party.
- Collusive practices, which mean an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.
- Money laundering, financing of terrorism and proliferation financing.
- Insiders abuses such as cases of bullying, physical/sexual harassment and those concerning dignity at work;
- Non-disclosure of interest
- General malpractice such as immoral, illegal or unethical conduct (including where someone's health & safety has been put in danger); and
- Any other activity which undermines the Bank's operations and corporate philosophy.

## 7.0 Whistleblowing Procedure

The whistleblowing procedure involves steps that should be taken by the whistleblower in reporting misconduct, and steps required for the investigation of the reported misconduct. The whistleblowing process will be guided by the following procedures:

### 7.1 Outsourced Whistleblowing Platform managed by Deloitte

To assure all Access Bank stakeholders of the confidentiality and anonymity of reported concerns, Access Bank also maintains an outsourced whistleblowing service managed by an independent party, Deloitte. This platform provided by Deloitte for raising concerns is branded Deloitte Tip-offs Anonymous (TOA). All whistleblowing reports should be made using any of the Deloitte TOA reporting channels (**see Appendix I**).

Before making a tip-off (report of alleged misconduct), it is important to obtain as much relevant information as possible, as the whistleblower would be requested to provide relevant information (**see Appendix I**).

### 7.2 Whistleblower Identity Options

There are three (3) options to choose from in protecting your identity as a whistleblower. This comprises Completely Anonymous, Partially Anonymous and Confidential Disclosure. Deloitte encourages whistleblowers to select either option of 'partially anonymous' or confidential disclosure', to afford Access Bank sufficient information to better handle your concern. All whistleblower reports are handled confidentially.

- **Completely Anonymous**

A Whistleblower who selects the completely anonymous option, will not be required to supply his/her name or any information that might reveal the whistleblower's identity. Consequently, the details of the whistleblower are unknown to either Deloitte or Access Bank. However, Deloitte TOA will be unable to contact the whistleblower for more information on behalf of Access Bank if further information about the whistleblower's reported concern is required.

- **Partially Anonymous**

A Whistleblower who selects the partially anonymous option will be required to disclose his/her personal details to Deloitte only. Deloitte Tip-offs Anonymous contact centre manages this reporting facility. The whistleblower's personal details would not be divulged to Access Bank. If further information about the whistleblower's reported concern is required, the Deloitte Tip-offs Anonymous contact centre will contact the whistleblower.

- **Confidential Disclosure**

A Whistleblower who selects the confidential disclosure option will be required to disclose his/her personal details to Deloitte and Access Bank. The whistleblower's name and contact details would be known to the Deloitte Tip-offs Anonymous contact centre, Access Bank and the investigators that will conduct the investigation.

### **7.3 Subsequent Action**

Upon receipt of a report, via any of the TOA reporting channels, Deloitte transmits the report to the designated recipient(s) within Access Bank (see Appendix III) for an investigation to be conducted. Deloitte will send each TOA report to designated officers usually within 24 hours of receiving an incident reported by a stakeholder. Public holidays, weekends, and events/circumstances beyond the control of Deloitte (such as strikes, riots and other force majeure) are excluded from the 24 hours timeline within which reports are required to be submitted to the Company.

### **7.4 Feedback to Whistleblower**

Feedback will be provided by Access Bank to Deloitte Tip-offs Anonymous after investigation and subsequently transmitted to the whistleblower through the initial channel of submission, upon the request of the Whistleblower (**see Appendix II**).

Deloitte would immediately acknowledge receipt of any reported concern by a whistleblower. However, feedback on the outcome of any reported concern would be dependent on the Bank time to completion of its internal investigations.

### **8.0 Applicability**

This policy applies to all Board Directors and employees of the Company who may have a complaint which they wish to have addressed but feel the complaint is so serious or is of such confidential nature that it cannot be discussed with the Line Manager, Head of Department or HR Manager.

In addition, anyone outside the Company who believes that there is a "reportable act" that should be brought to the attention Access Bank, should follow the procedure outlined in this policy. Likewise, any other conduct that is likely to cause financial or non-financial loss to the Company and/or brand and reputation, or otherwise be detrimental to the interests of the Company.



## 9.0 Obligations and Protection of the Whistleblower

In making whistleblowing reports, the whistleblower is obligated to ensure that:

1. The report is made in good faith
2. He or she has reasonable grounds to believe that the report is true.
3. The whistleblower is encouraged to report even if he or she does not have all the relevant information.
4. He or she is not making the report for personal gain.
5. Reports should be made timely.
6. Although the whistleblower shall not be expected to prove the truth of an allegation, he/she shall need to demonstrate that there are sufficient grounds for the concern.
7. Any employee or director who makes a report in bad faith is subject to discipline, including termination of board appointment or employee status, or other legal means to protect the reputation and brand of the Company and members of its Board and employees.
8. Disciplinary/legal action will be taken against anyone deliberately raising false and malicious allegations against Access Bank.
9. It shall be the policy of Access Bank to protect whistleblowers who disclose concerns, provided the disclosure is made;
  - in the reasonable belief that that it is intended to show malpractice or impropriety.
  - to an appropriate person or authority; and
  - in good faith without malice or mischief.
  - The Company shall consider the following in dealing with anonymous disclosure:
    - the seriousness of the issues being reported.
    - the significance and credibility of the concern; and
    - the possibility of confirming the allegation.

Directors, executive management and/or employees who acted in good faith by reporting a violation of the Company's Code of ethics and/or other policies, processes and procedures shall not suffer any form of harassment, retaliation, or adverse employment consequence. Anyone who retaliates against the whistleblower (who reported an event in good faith) will be subject to discipline, including termination of board appointment or employee status.

The whistleblower shall receive no retaliation or reprisal for a report that was provided in good faith even if the report turns out to be wrong i.e. that was not done primarily with malice to damage another or the Company.

## 10.0 Non-Compliance

Failure to ensure compliance with this Policy could lead to the following consequences:

- ✓ Disciplinary action initiated by the Company, including dismissal; and/or
- ✓ Termination of any contractual relationship by the Company for breach of this Policy.

## 11.0 Disclaimer

A stakeholder's right to protection under this policy does not extend immunity for any complicity in the matters that are the subject of the report or an ensuing investigation or for reports made maliciously.



**12.0 Periodic Review**

This policy shall be reviewed in line with the risk rating or as may from time to time be determined by the Bank. As the need arises, however, specific aspects of the policy may be reviewed and updated at the discretion of the Executive Management.

Whistleblowing reports received by DELOITTE are sent to five dedicated recipients in **Appendix III**. Whether the whistle blower discloses his/her identity, DELOITTE will not provide any indication of the whistle blower’s identity to Access Bank except DELOITTE has a written consent from the whistle blower to provide his/her identity to Access Bank.

The Internal Whistle Blowing Hotline shall be available during working hours on workdays only. However, the email channel will always be available, and the information provided by the whistle blower kept confidential.

For successful implementation of the whistle blowing program, the activities in the policy below have been noted down:

<b>Task</b>	<b>Frequency</b>	<b>Step</b>	<b>Responsibility</b>
Send reports from Whistle blowers on behalf of Access Bank to designated Access Bank staff	Daily	<ol style="list-style-type: none"> <li>1. Receive a report from a whistle blower on behalf of Access Bank and send same to designated staff of Access Bank within 24 hours of the report from the whistle blower.</li> <li>2. If the report is against any of the designated recipients of Access Bank, DELOITTE is to send the report to the other recipients exclusive of the designated Access Bank staff indicted in the whistle blowing report</li> </ol>	DELOITTE
Receive reports on whistle blowing from DELOITTE	Daily	<ol style="list-style-type: none"> <li>1. The designated recipients of these reports will receive the reports from DELOITTE.</li> <li>2. The designated recipients in Internal Audit and Compliance would treat the received complaints in line with their function. Compliance would keep a log of received complaints for reporting while</li> </ol>	Access Bank



		<p>internal audit investigates the complaint.</p> <p>3. For all the whistleblowing reports that require investigations or further action(s), the outcome of the investigation report should be distributed based on the type of incident.</p>	
Send Report (Monthly to DELOITTE / Quarterly to CBN)	Monthly/Quarterly	<ol style="list-style-type: none"> <li>1. The Chief Conduct &amp; Compliance Officer receives a monthly summary sheet from DELOITTE.</li> <li>2. The Global Compliance Advisory officer receives the monthly summary reports from the Chief Conduct &amp; Compliance Officer and verifies same for completeness.</li> <li>3. On the 12th of every month, monthly status of whistleblowing report for previous month should be sent to DELOITTE.</li> <li>4. On the 7th day of the month following end of every quarter, the quarterly status report should be sent to the CBN and NDIC with an approved cover letters.</li> </ol>	Group Conduct and Compliance

**EMPLOYEE DISCLOSURES TO A GOVERNMENT, REGULATORY OR SELF REGULATORY AGENCY**

Nothing contained in this Policy prohibits or restricts an employee from voluntarily reporting concerns to a government, regulatory, or self-regulatory agency as required by local jurisdiction regulations. Employees do not need prior permission from the Bank to raise such Concerns, and employees are not required to notify the Bank after doing so.

**CONFIDENTIALITY**

In reporting concerns, the confidentiality of the issue reported and anonymity of the individual who reported must be maintained except where required by a legal proceeding or by law. In the case, where the confidentiality or anonymity is required by a legal proceeding or law, a written consent of the whistle – blower (wherein his/her identity had been willingly disclosed) will be required.

**13.0 PROTECTION FOR WHISTLE BLOWERS**

Any staff, consultant, shareholder, director, vendor or member of the public, who reports an irregularity, provided that this is done in good faith and in compliance with the provisions of this policy, shall be protected against any acts of retaliation.

The Bank shall not subject a whistleblower to any detriment whatsoever on the grounds that she/he has made a disclosure in accordance with the provisions of the CBN guidelines for whistle blowing even when it is untrue.

Where a whistle-blower has been subjected to any detriment in contravention of the CBN guideline, he/she may present a complaint to the CBN. This is without prejudice to the right of the whistleblower to take appropriate legal action.

For the purposes of this policy, "detriment" is defined as any action or threat of action which is unjustly meted to the whistleblower because of his/her report, including, but not limited to harassment, discrimination and acts of vindictiveness, direct or indirect, that are recommended, threatened or taken against the whistleblower, dismissal, termination, redundancy, undue influence, duress, withholding of benefits and/or entitlements and any other act that has negative impact on the whistle-blower.

An employee who has suffered any detriment by reason of disclosure made pursuant to the provision of the policy shall be entitled to compensation and/or reinstatement provided that in the case of compensation, the employee's entitlement shall be computed as if he had attained the maximum age of retirement or had completed the maximum period of service, in accordance with his condition of service. For other stakeholders, the whistle-blower shall be adequately compensated.

"Good faith" can be taken to mean the explicit belief in the authenticity of the reported incidents, i.e. the fact that the member of staff reasonably believes the transmitted information to be true.

#### **14.0 INVESTIGATION**

After incident reports are received from the External reporting channel (DELOITTE) or the internal whistle blowing channels, a preliminary evaluation will be carried out by Global Compliance Advisory Unit to validate the incidents. Cases that require further investigations will be handled by the Internal Audit Group as received from DELOITTE.

Where DELOITTE or the whistle blower wants information on an outcome of investigation, such information should be given because it is important for the whistle blower to be aware that an action is being taken about the incident reported.

Where there is no case to a claim raised by a whistleblower, or it is clear that the person making such claim acted in good faith, the Chief Internal Auditor shall ensure that the person suffers no reprisal. However, when a person makes a report in bad faith, particularly if it is based knowingly on false or misleading information, a report of finding should be kept on the incident without any disciplinary actions against the whistle blower.

The Head, Group Internal Audit shall review reported cases and recommend appropriate action to the Group Managing Director (MD) and where issues affect Executive Management, such issues should be referred to the Board. The Board or MD shall take appropriate action to redress the situation within a reasonable time.

Types of Incidents	Recipients of Report
Fraud, theft of company assets	Group Managing Director Company Secretariat Chief Compliance Officer Chief Inspector/Head of Internal Audit Human resource related matters
Breach of Code of Corporate Governance for Banks in Nigeria Other types of unethical conduct	Chairman of the Board Group Managing Director Chief Risk Officer Chief Compliance Officer
Report against a Director (excluding the Managing Director) irrespective of type of incident	Chairman of the Board Group Managing Director Company Secretary
Report against the Managing Director irrespective of type of incident	Chairman of the Board Company Secretary

Note that the following key principles are embedded in the Bank's whistle blowing mechanism to ensure its effectiveness:

- An assurance that whistle blowing reports made will be promptly investigated
- An assurance that the identity of the reporting employee will be kept confidential
- An assurance that there will be no retaliation against reporting employees
- Infringements of items (a) to (c) will result in disciplinary action including dismissal.

## 15.0 REWARD SCHEME FOR WHISTLE BLOWERS

A reward scheme has been designed for whistle blowers whose identities are known. Due to confidentiality issues, the names of identified whistle blowers will be restricted to key officers in HR, Conduct and Compliance, Anti- Fraud Unit and Internal Audit Group. The process will be as follows:

- Upon receipt on information from whistle bower, Internal Audit will investigate the authenticity of the information.
- If information is verified, evidenced by an approved report by Executive Management, the whistle blowers will be rewarded based on the identified risks to the bank.
- Rewards to be given to whistle blowers will be done discreetly to protect their identity.

### 15.1 Categories of Risk being averted

The risks to the bank have been identified under two broad categories:

- Financial Loss:** This is when the information provided by the whistle bower has saved the bank from any loss in monetary terms.
- Non-Financial Loss:** This is when the information provided by the whistle bower has saved the bank from reputational risks, operational risk etc. without any financial implication to the bank.

The recommended rewards are summarized below:

S/N	Risk to the Bank	Amount Less than N10M	Amount above N10M
1	Financial Loss	2.5% of the sum recovered as a result of the case reported.	5% of the sum recovered as a result of the case reported.
2	Non-Financial Loss	A letter of commendation signed by the Chief Risk Officer and 1	

## **15.2 REPORTS TO THE REGULATORS AND BOARD**

The Head, Group Internal Audit shall provide the Chairman of the Board Audit Committee with a summary of cases reported and the result of the investigation. The Bank shall make quarterly returns to the CBN and NDIC on all whistle-blowing reports and corporate governance related breaches. The Bank shall include a whistle blowing compliance status report in its annual audited financial statements.

## **15.3 RIGHTS OF PERSONS IMPLICATED**

Any Access Bank member of staff implicated by reports of irregularities must be notified in good time of the allegations made against them, provided that this notification does not impede the progress of the procedure for establishing the circumstances of the case.

It is important to note here that the basic rights of any member of staff implicated by the reported incidents must be respected, whilst ensuring that the procedures provided for are effective.

## **15.4 TRAINING & AWARENESS**

Employees are expected to be trained at least once yearly with regards to the requirements, expectations, roles, and responsibilities of the policy.

Awareness with regards to this policy will be done regularly through nuggets, screen savers, employee central, comics, "did you know series" etc. in line with the awareness program.

## APPENDIX I

### Procedure for using Deloitte Tip-offs Anonymous

How it Works: Whistleblowing reports should be made using any of the Deloitte TOA reporting channels listed below.

- Toll free hotline: 0800TIPOFFS (0800 847 6337).
- Web Portal: <https://tip-offs.deloittemanagedsolutions.com.ng/>
- E-mail: tip-offs@deloitte.com.ng.
- Mobile App: Download Deloitte Tip-offs Anonymous App on Android or iOS devices.

#### Step 1:

Whistleblower contacts Deloitte Tip-offs Anonymous contact centre via the toll-free hotline (Calls are toll-free to all networks). Dial the hotline from any telephone of your choice. You may call anonymously – even if you disclose your name, your identity will remain confidential and will not be disclosed to Access Bank except with your consent.

#### Step 2:

Our contact centre agent provides options of anonymity, prompts questions and provides a unique reference number to the whistleblower. The contact centre agent interviews the whistleblower to obtain as much relevant information as possible.

Ensure you provide all the available details:

- a. Nature of the incident
- b. People involved
- c. Dates of incident
- d. Place of occurrence
- e. How the incident occurred
- f. Any other useful information

#### Step 3:

Report analyst sanitizes report to remove any details that might identify the whistleblower, if the partially anonymous or completely anonymous option is chosen.

You will be assigned a unique reference code (PIN) – keep this confidential as you will need this number if you make a follow-up. You may call back for feedback on your report or to provide additional information

#### Step 4:

The information received is captured in a TOA report format, the report is reviewed by the Contact center manager and transmitted to designated personnel of Access Bank for further action (see Appendix II) .

#### Step 5:

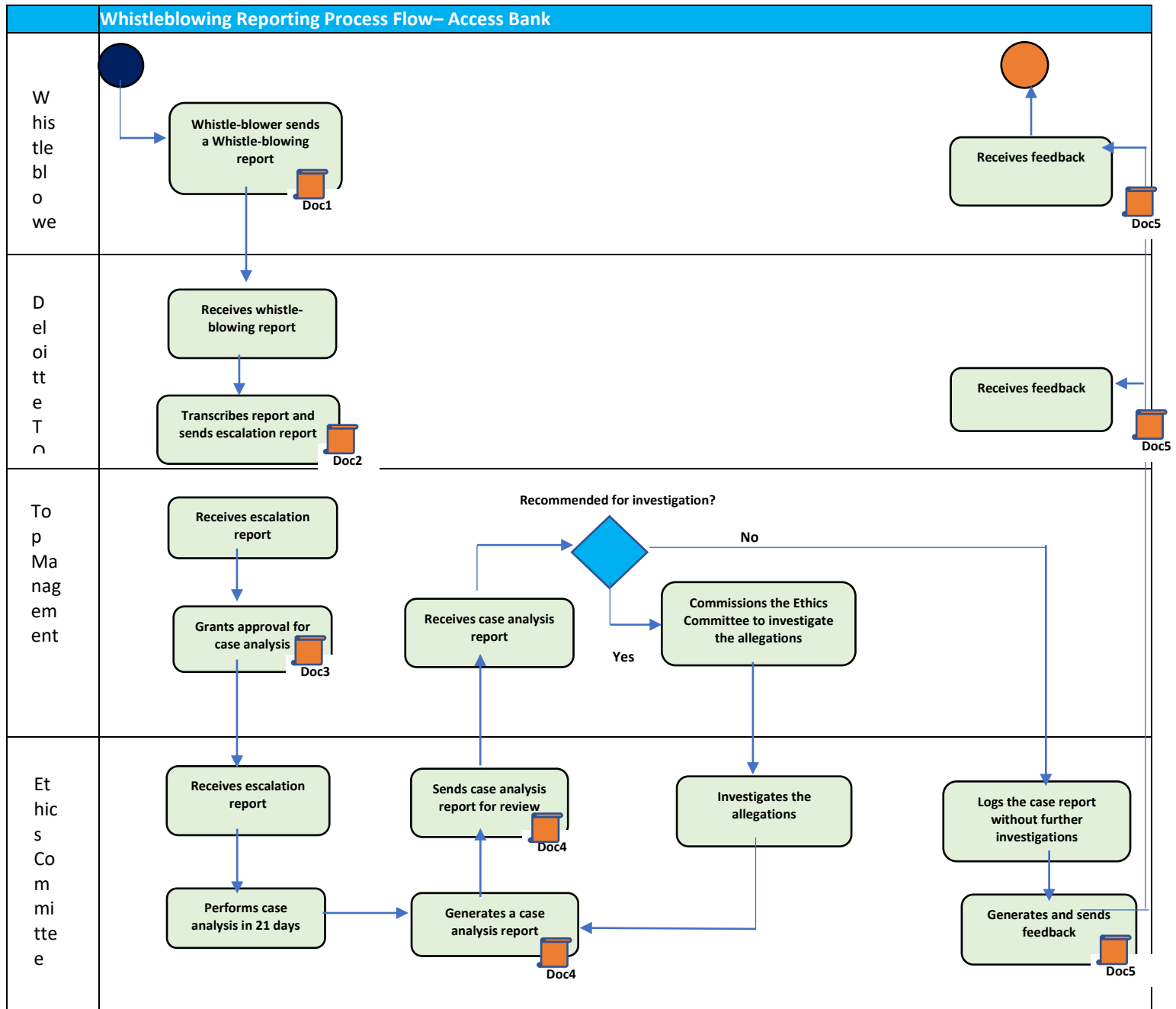
The investigation is conducted, and feedback is provided by Access Bank to Deloitte.

#### Step 6:

The Whistleblower may subsequently call back to provide additional information or request feedback

## APPENDIX II

Process Flow for Reporting



**Document Legend:**

- **Doc1** – Whistle – blowing report
- **Doc2** – Escalation report by Deloitte TOA
- **Doc3** – Approval for the conduct of case analysis
- **Doc4** – Case Analysis report by the Access Bank’s Ethics Committee
- **Doc5** – Feedback from the Ethics Committee



### APPENDIX III

#### Tip-Offs Anonymous (TOA) Report Escalation Matrix

S/N	Type of incident	Recipients	Names of Recipients
1	All forms of financial malpractices or impropriety such as fraud, corruption, bribery and extortion	Managing Director/Chief Executive Officer	Roosevelt Ogbonna
		Chief Compliance Officer	Femi Jaiyeola
		Head of Internal Audit	Omobola Faleye
2	HR-related matters (e.g., sexual harassment, conflict of interest, other employment, political activities, alcohol & drug abuse, certificate forgery, etc.)	Managing Director/Chief Executive Officer	Roosevelt Ogbonna
		Chief Compliance Officer	Femi Jaiyeola
		Head of Internal Audit	Omobola Faleye
3	Breach of the Code of Conduct and Business Principles	Managing Director/Chief Executive Officer	Roosevelt Ogbonna
		Head of Internal Audit	Omobola Faleye
		Chief Compliance Officer	Femi Jaiyeola
4	Theft of company asset, Sabotage or vandalism of the company asset	Chief Compliance Officer	Femi Jaiyeola
		Managing Director/Chief Executive Officer	Roosevelt Ogbonna
		Head of Internal Audit	Omobola Faleye
5	Any other type of unethical conduct	Chief Compliance Officer	Femi Jaiyeola
		Head of Internal Audit	Omobola Faleye
		Managing Director/Chief Executive Officer	Roosevelt Ogbonna
6	Reports against Directors & Executives (other than the Managing Director) irrespective of the type of incident	Chairman of the Board	Ajoritsedere Awosika
		Managing Director/Chief Executive Officer	Roosevelt Ogbonna
7	Reports against the Managing Director irrespective of the type of incident	Chairman of the Board	Ajoritsedere Awosika
		Independent Director	Adeniyi Adekoya
8	Monthly Summary Reports	Head of Internal Audit	Omobola Faleye
		Chief Compliance Officer	Femi Jaiyeola

# **ACCESS BANK PLC**

## **Whistleblowing Policy**

**Next Review Date:**

**Risk Rating:**

**Moderate**

**Policy Approval, Attestation and Engagement Document**

Generated for case number 59708311

## Document Information

### Document Owner

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## Document Name

Whistleblowing Policy

## Document History

Document Prepared By	Date	Version	Comments
Kazeem Mohammed	2023-04-05		To reflect the changes in whistleblowing partners and the reporting channels

## Executive Summary

Whistle blowing refers to the practice of reporting wrongdoing or unethical behaviour in an organization. The purpose of the whistle blowing program is to encourage employees to disclose any malpractice or misconduct which they observe. The Whistle Blowing Policy is primarily for concerns where the interest of the Bank or its stakeholders is at stake. The policy is therefore fundamental to the bank's professional integrity. In addition, it reinforces the value the bank places on staff to be honest and respected members of their individual professions. More so, it is important to note that employees who report allegations of malpractice will be protected as confidentiality is key to the effective implementation of a whistle blowing program.

## Approval Log

FUNCTION	NAME	DATE
Requested By	Kazeem Mohammed	2023-04-05 08:22:27
Unit Head Approval	JOSEPH OSOGBUE	2023-04-05 11:44:10
Reviewed By		

FUNCTION	NAME	DESIGNATION	SIGNATURE	DATE
Reviewed By	Jaiyeola Femi	Group Chief Conduct & Compliance Officer	Completed	2023-04-16 20:51:12
Reviewed By	Olayiwola Olufemi	Head, Operational	Completed	2023-04-28 15:53:32

		Risk Management		
Reviewed By	Imowo Robert	Head, Corporate Counsel	Completed	2023-04-30 10:22:09
Reviewed By	FALEYE OMOBOLA	Chief Audit Executive	Completed	2023-05-02 09:03:35
Concurred By	Jobome Gregory	Executive director, risk Management	Completed	2023-05-04 21:27:47
Approved By	OGBONNA ROOSEVELT	Managing Director/CEO	Completed	2023-05-04 23:26:07

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