**GLO:** 0705-889-0140

E-Mail

Internal: whistleblower@accessbankplc.com External: kpmgethicsline@ng.kpmg.com

The Bank's website also provides an avenue for lodging whistle-blower's reports. Individuals interested in whistleblowing may click on the Customer Service link on the Bank's website, scroll down to the whistle-blower column, and then register, anonymously or otherwise, any allegations they want the Bank to investigate.

The Bank's Chief Audit Executive is responsible for monitoring and reporting on whistleblowing. Quarterly reports are rendered to the Board Audit Committee.

In addition to the foregoing, stakeholders may also report unethical practices to the Central Bank of Nigeria via anti-corruptionunit@cbn.gov.ng.

## **Customer Complaints and Resolution**

The Bank complied with the provision of CBN Circular FPR/DIR/C IR/GEN/01/020 dated 16 August, 2011 on handling consumer complaints. The Bank in line with the rules of the Securities and Exchange Commissions has implemented Investors Enquiries and Complaints Management Policy. The Policy is available in the Investor portal on the Bank's website

## Highlights of the Bank's Clawback Policy

The objective of the Clawback policy is to recover excess and undeserved rewards such as bonuses, incentives, profit sharing and other performance-based compensation from current and former Executives and applicable Senior Management employees.

The policy would be triggered if the Bank's financial performance on which the reward was based is discovered to be materially false, misstated, erroneous or in instances of misdemeanour, fraud, material violation of the Bank's policy or regulatory infractions.

The Executives, Chief Financial Officer and applicable senior management employee must have served the Bank during the 'look back period' and incentives paid to them must have been tied to a financial parameter. The policy applies to any incentive based compensation paid during any of the three fiscal completed years immediately preceding the date the Bank is required to restate its financial results (look back period), meaning the earlier of:

 The date that the Audit Committee concludes that the Bank's previously issued financial statement contains a material error or  The date on which a court, regulator or other similarly authorized body causes the Bank to restate its financial information to correct a material error.

## **Highlights of Sustainability Policies**

The Bank's sustainability vision and strategy are underpinned by international principles, frameworks and standards that support the design of best-in-class local policies that enable effective mainstreaming of sustainability in the Bank for strategic growth and long-term success. The Bank's policies and frameworks (such as Enterprise Security Risk Management [ESRM], Health, Safety, Security and Environment [HSSE], Human Rights, and employee volunteering policies), continue to facilitate the achievement of its vision. These enable the Bank, its people, and processes to address key issues such as supply chain management, human rights, environmental management, ethics, compliance and corruption, data security and privacy, diversity and equality, amongst others. The strict adherence to these policies is one of the ways to ensure Access Bank remains a responsible corporate citizen.

Access Bank Plc respects the rights of all people, men, women, old, young, people living with HIV/AIDS (PLWHA). Access Bank was the first Nigerian bank to have a fully operational workplace policy on HIV/AIDS. We pioneered the HIV/ AIDS Workplace Policy Programmeme across all our subsidiaries.

The Bank has demonstrated an unwavering commitment to sustainability, evident in its leadership role in developing the Nigerian Sustainable Banking Principles (NSBPs) in 2012 – a set of nine principles by which all banks in Nigeria are encouraged to live the sustainability ethos.

The Bank has deployed several environmental protection initiatives, including recycling, conservation of energy and water.

A detailed report on the Bank's sustainability activities is contained on pages 56-75 of this Annual report.

## **Statement of Compliance**

We hereby confirm to the best of our knowledge, that the Bank has complied with the following Codes of Corporate Governance and Listing Standards

- The Code of Corporate Governance for Public Companies in Nigeria as Issued by the Securities and Exchange Commission
- The Code of Corporate Governance for Bank and Discount Houses in Nigeria and the Guidelines for Whistle Blowing in the Nigerian Banking Industry
- The Financial Reporting Council's Nigerian Code of Corporate Governance

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- 4. The Nigerian Exchange Limited Rules for Listing on the Premium Board
- 5. The Post-Listing Rules of the Nigerian Exchange Group

Save that in the event of any conflict regarding the provisions of the respective Codes and Rules, the Bank will defer to the provisions of the CBN Code as its primary regulator.

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**Ajoritsedere Awosika** Chairman The state of the s

**Sunday Ekwochi** Company Secretary