

Access Bank

Employee Code of Conduct



access

more than banking

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Code Foundations

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Scope

The Code covers a wide range of business practices and procedures. It does not cover every situation that may arise, but it sets out basic principles to guide the actions of all employees of the Bank.

If a law says something different from this Code, follow the law.

If a common practice in the area goes against this Code, follow the Code.

If you are not sure what to do, ask your supervisor, your manager, or the Conduct & Compliance team for guidance.

Those who violate the standards in this Code will be subject to disciplinary action which may include termination of employment or service.

Preamble

The Access Bank Code of Conduct sets out the standards, policies, and procedures expected of all Directors and Employees. It emphasizes integrity, ethical conduct, and compliance with laws in both internal operations and external dealings.

The Code serves as a guide to uphold the Bank's values, act as role models in society, and ensure alignment with legal requirements. If any provision is unclear or conflicts with the law, clarification or amendments should be sought from Conduct & Compliance.



DEFINITION



The Bank/Access Bank

Access Bank Plc and its Subsidiaries



Directors

All Directors of Access Bank Plc and its Subsidiaries



Management

Direct Supervisor of an Officer



Employees

All staff of the Bank, including full-time employees and outsourced staff engaged on either a permanent or temporary basis.



Customer/Client

An entity or person(s) whether organized for profit or not with whom Access Bank has a business relationship



Disclosure/Declaration to Conduct & Compliance

All disclosures shall be made through Conduct & Compliance, which will escalate any exceptions to Management or the appropriate Management and Board Committee as required.

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Our Corporate Governance



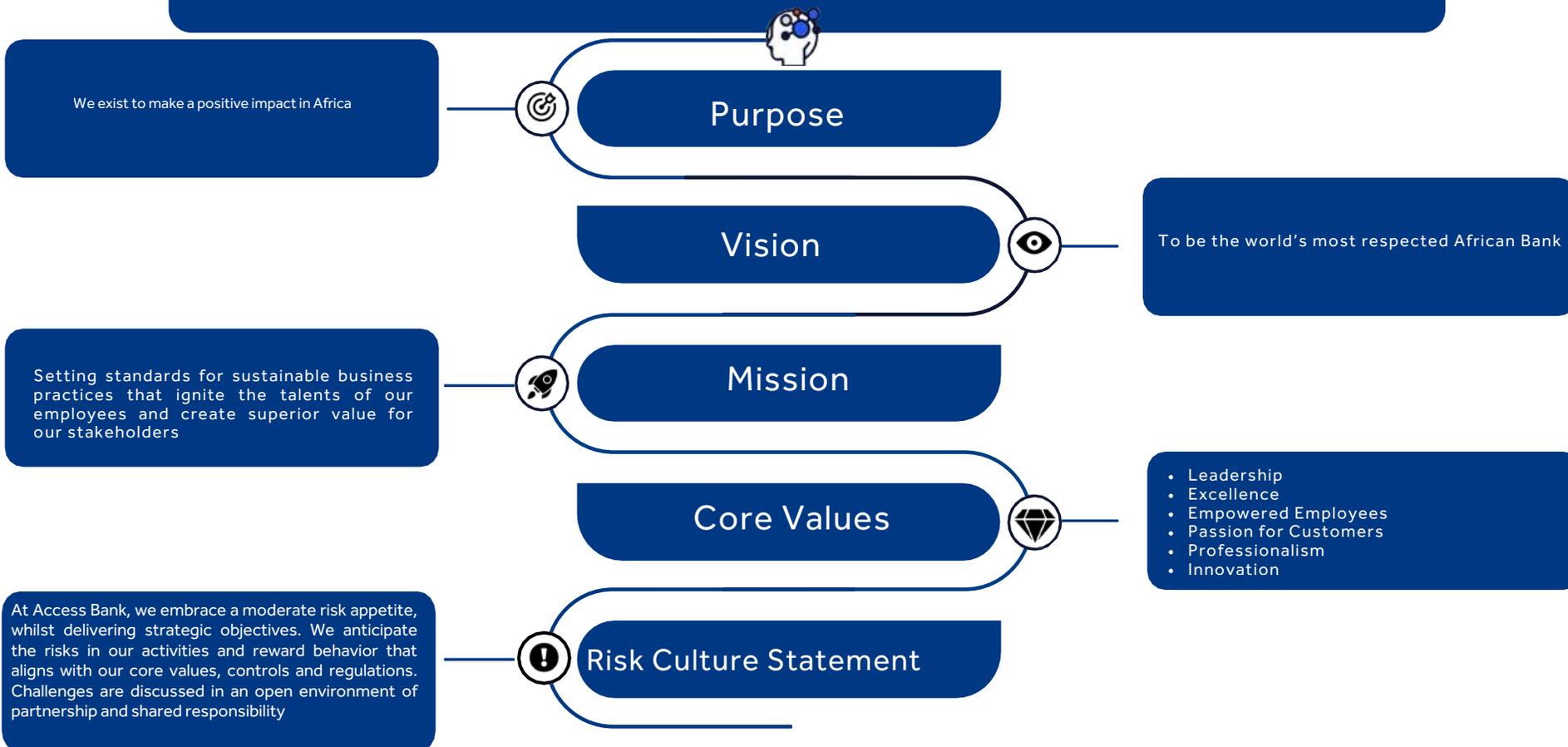
Access Bank Plc recognizes that strong corporate governance is essential to building and maintaining the trust of its stakeholders. Strong governance provides a clear framework for setting the Bank's objectives and achieving them responsibly and effectively.

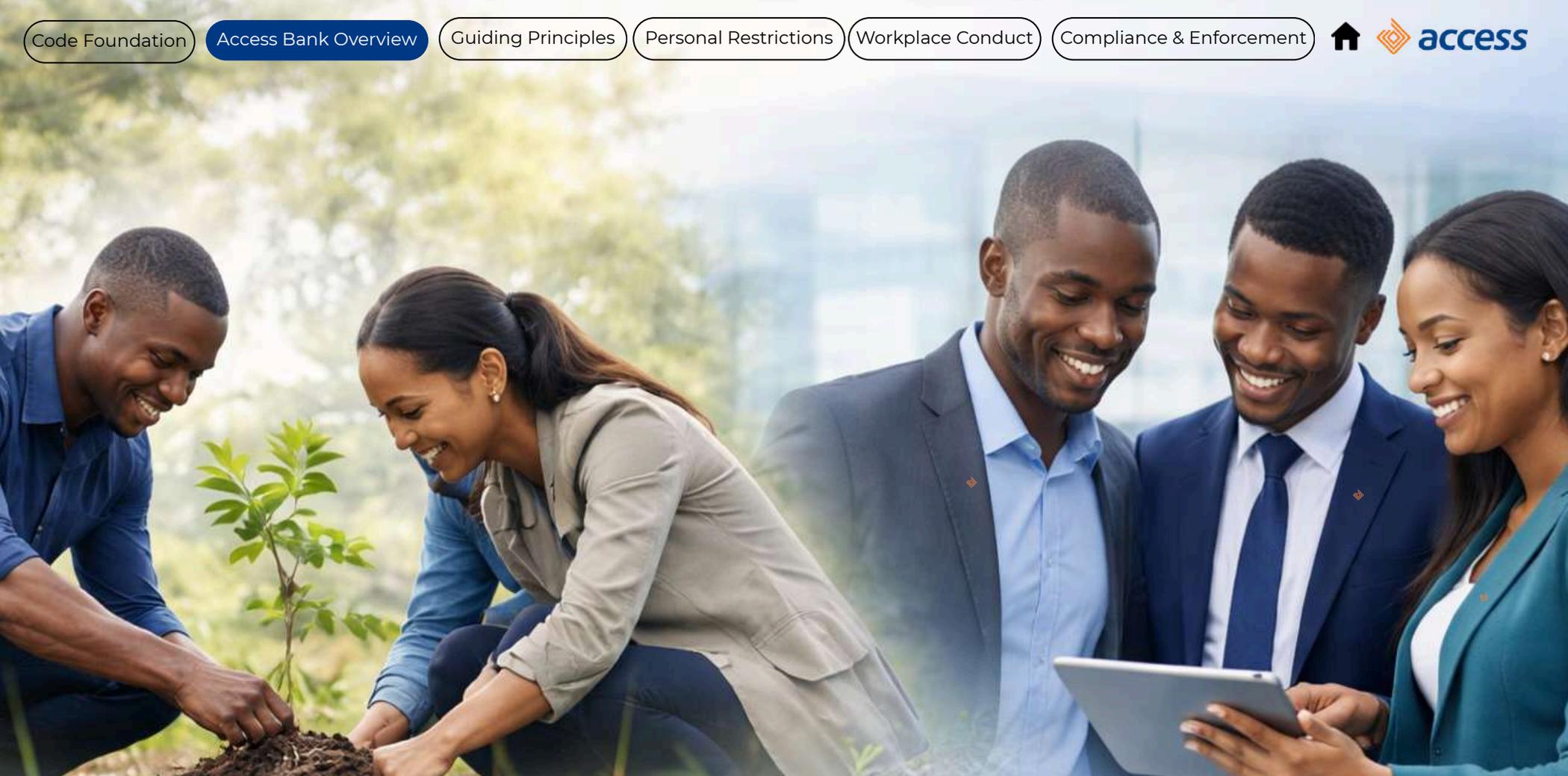
The Bank's governance structure is guided by the Central Bank of Nigeria's Code of Corporate Governance for Banks, the Securities and Exchange Commission's Code of Best Practice, as well as Access Bank's own governance principles.

These governance standards also apply to the Bank's subsidiaries, alongside compliance with applicable local regulatory requirements in the jurisdictions where they operate.

[Click Here to learn more](#)

Our Corporate Philosophy





Environmental Social Responsibility

Access Bank is committed to conducting its business in a responsible, ethical, and sustainable manner.

Employees and stakeholders are expected to consider environmental and social risks in decision-making and to support practices that promote long-term value creation, protect the Bank's reputation, and contribute positively to society.

The Bank integrates environmental and social risk considerations into its overall risk management approach and conducts its activities in compliance with applicable laws, regulations, and recognized international standards.

Employees must act responsibly, avoid actions that may cause environmental or social harm, and comply with all relevant policies and procedures relating to sustainability and responsible banking.

Access Bank's Environmental and Social Risk Management framework is governed by Board-approved policies and is subject to periodic review to ensure continued effectiveness and alignment with best practices.

[Click Here to learn more](#)



Business & Operational Resilience

Access Bank is committed to maintaining operational resilience and ensuring the continuity of critical services to customers, even in the event of disruptions or emergencies.

Employees are expected to support the Bank's business continuity arrangements and to comply with established procedures designed to minimize disruption to operations and service delivery.

In all circumstances, the safety, health, and welfare of employees, customers, and visitors are the Bank's highest priority. During major incidents, employees must follow official instructions, cooperate with response efforts, and act responsibly to safeguard people, information, and assets.

Access Bank maintains a Business Continuity Management System governed by Board-approved policies and supported by tested plans and arrangements to ensure preparedness and effective response to significant disruptions.

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01

Introduction

The Access Bank Code of Conduct describes the common ethical standards, policies and procedures of Access Bank. These standards, policies and procedures relate to: Compliance with Laws, Rules & Regulations. Conflict of Interests Personal Restrictions Workplace Conduct Compliance & Enforcements.

-  Compliance with Laws, Rules & Regulations.
-  Conflict of Interests
-  Personal Restrictions
-  Workplace Conduct
-  Compliance & Enforcements.

02

Compliance with Laws, Rules & Regulations

Obeying the laws, rules and regulations, both in letter and in spirit, is the foundation upon which the Bank's ethical standard stand.

- 01 All employees are expected to understand and comply with all applicable laws and regulations.
- 02 Violations or suspected violations must be reported immediately to your Supervisor, Manager or Conduct & Compliance.
- 03 Employees must not make misleading statements to government examiners or investigators.
- 04 All Employees of the Bank must respect and obey the laws of every jurisdiction where the Bank operates, including but not limited to BOFIA, CAMA, CBN Circulars, the CBN Code of Conduct for Directors, and the Failed Banks Act.
- 05 Employees shall NOT destroy or alter any Bank document during any government examination or investigation.
- 06 Employees must not obstruct, mislead or delay the communication of information or record, or influence others to do so.

03

Professional Performance

Access Bank is committed to ensuring that every transaction is carried out with the highest professional standards.

We only provide services we can competently deliver and exercise due professional care in all products and services offered.

04

Integrity & Objectivity

We uphold integrity and objectivity as the foundation of trust with our customers and colleagues.

In every customer relationships, every Officer shall:

- Present facts truthfully.
- Make unbiased and independent recommendations.
- Exercise sound judgement, resolving doubts in the customer's favor when justified.

05

Confidential Information

Employees must not disclose the Bank's Confidential Information, trade secrets, or processes, during or after employment, except as authorized.

- Obligations continue even after disengagement from the Bank, unless information becomes public.
- All documents and data prepared or accessed remain Bank property and may only be used for the Bank's benefit.
- Employees must protect customer information and disclose it only when required by law, professional responsibility, customer authorization, or enforceable summons.

Insider Trading

Employees must not trade or advise others to trade securities using confidential, non-public information gained through their role. Any employee found engaging in Insider Trading will face strict disciplinary actions and legal penalties.

06

AML/CFT/CPF Compliance Statements

Access Bank commits to the campaign against money laundering, financing of terrorism, proliferation financing and all other forms of financial crimes. As a compliant organization, it continually enforces these principles and ensures compliance with the laws.

- Strict compliance required from all stakeholders (customers, partners, staff, board and management etc.).
- Policies and controls are in place across all subsidiaries.



Click [Here](#) to access our AML policy

CONFLICT OF INTEREST



Interest In Other Companies

Employees and their family members must not own or hold significant financial interests in any company that does business with the Bank, wants to do business with the Bank, or competes with the Bank, unless they have first disclosed it in writing to Conduct and Compliance for review and approval.

Employment By Other Companies

Employees shall not serve as directors, partners, consultants, or accept managerial or other employment positions with organizations that conduct significant business with, or compete against the Bank, unless such positions have been approved by the Managing Director and fully disclosed in writing to the conduct and compliance

Soliciting Suppliers and Customers

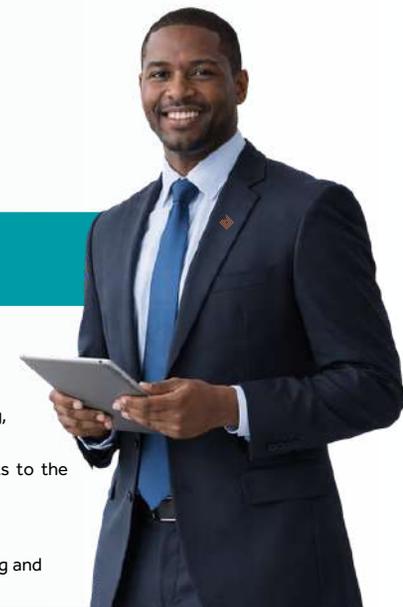
Employees shall not solicit donations, cash, merchandise, or services from suppliers, customers, or contractors for Bank events, as this may create obligations or perceived bias. Supplier relationships must remain strictly based on competitive ability to meet the Bank's needs.

Fees and Honorariums

With prior approval from Conduct and Compliance, Employees of the Bank may give lectures, conduct seminars, publish articles in books or engage in any other similar activity for which a fee or honorarium may be paid.

Personal Conflict

- 1 Employees must not let personal interest interfere with their duties.
- 2 Employees are expected to act with honesty, diligence, and in the Bank's best interests.
- 3 Employees must not engage in businesses the Bank is licensed for (e.g., Currency trading, lending, fund management, or financial advisory).
- 4 On assumption of office, Employees must disclose any personal or spousal business interests to the Conduct & Compliance.
- 5 They must avoid actual or perceived conflicts between personal interests and official duties
- 6 Where a conflict arises, the Employees shall promptly notify the Conduct & Compliance in writing and step aside from related decisions.



Organizational Conflict

The Bank does not allow situations where its duty to one customer may clash with its duty to another. Every interaction with customers and stakeholders must be handled with honesty, fairness, and integrity.

Inducement

Inducement is prohibited. Employees must not give benefits to staff of other companies to influence business decisions. Modest, lawful, and transparent gifts or courtesies that serve a legitimate business purpose (e.g., seasonal gifts, ordinary business hospitality) are acceptable, provided they cannot be perceived as bribes or cause embarrassment to the Bank.

Processing Personal Transactions

Employees shall not process their own transactions from beginning to end. Such transactions must be handled by another authorized Officer.

Conducting Business With Related Companies

Directors and all other Employees must not conduct business with family members or with companies in which they or their family members have a significant financial interest or employment. If such dealings are unavoidable, they must first be disclosed in writing to Conduct and Compliance before any business takes place



Competition and Fair Dealing

Employees shall compete fairly and honestly, seeking advantage through superior performance rather than unethical or illegal practices.

- The use or inducement of unauthorized proprietary or trade secret information is prohibited.
- Employees must respect the rights of customers, suppliers, competitors, and colleagues.
- Employees must not engage in manipulation, misrepresentation, abuse of privileged information, or any other unfair practice.

Health And Safety

The Bank is committed to providing a safe and healthy workplace. Employees are responsible for complying with safety rules, reporting accidents or unsafe conditions, and avoiding violence or threatening behavior.

- Employees must not report to work under the influence of alcohol.
- The use of illegal drugs, whether inside or outside the workplace, will not be tolerated.

Record Keeping & Transparent Communication

Employees shall ensure accurate and transparent recording of information to support responsible business decisions.

- All expenses must be properly documented.
- Books, records, accounts, and financial statements must fairly reflect transactions and comply with legal and internal control requirements.
- Records and communications (including emails, memos, and reports) must be factual, professional, and free from exaggeration and derogatory remarks.
- Records must be retained or destroyed only in line with the Bank's record retention policies.

Discrimination and Harassment

The Bank values workforce diversity as a key strength.

Employees should promote equal opportunity in all aspects of employment and shall not tolerate discrimination or harassment of any kind.

Whistleblowing & Reporting Violations:

Employees of the bank are encouraged to report unethical behavior, fraud, or violations of this Code through our whistleblowing channels. Reports will be treated confidentially, and whistleblowers will be protected from retaliation.

Reporting Channels

You may report your concerns to the Whistleblowing Channels by:



Reporting online through website submission at:

<https://tip-offs.deloitte.com.ng>



Calling the Toll free Hotline (available 24/7 in multiple languages)

- Dialling 0800TIPOFFS (0800 847 6337)



Sending an e-mail to:

- tip-offs@deloitte.com.ng
- whistleblower@accessbankplc.com

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Gifts From Customer

Cash gifts from customers, vendors, other third parties, and any form of monetary transfers are strictly prohibited. This includes cash payments, bank or electronic transfers, mobile money transfers, and deposits into an employee's personal or related accounts.

All allowable non-cash gifts must be declared through the [Gift Declaration Portal](#) on ProcessMaker. Items declared outside Lagos are to be securely stored in the Branch Vault and forwarded to Head Office quarterly.

Failure to declare gifts or acceptance of prohibited gifts constitutes a sanctionable offence.

Loans to or from Customers/Suppliers

Employees, their spouses, and dependents must not accept loans from customers or suppliers of the bank. Loans may only be taken from the Bank or from other legally recognized financial institutions

Transactions with Customers, Regulators and Service Providers

Employees must maintain a strictly professional relationship with the Bank's customers and suppliers. Employees must not enter into personal financial arrangements, including loans or advances, that could influence or appear to influence their judgment or decision-making.

All personal interests, whether beneficial or not, in any business relating to customer or supplier of the bank must be disclosed to Conduct and Compliance.

Employees, their spouses, and dependents must not accept discounts, preferential pricing, or special terms from customers or suppliers of the bank, except where such benefits are publicly available to other individuals or groups of similar size and composition.

Use of Staff Account by Third Parties

Employees must not use their Bank accounts for transactions on behalf of others, including but not limited to proof-of-funds or holding funds. Normal personal and legitimate transactions are not affected

Account with other Financial Institutions (FIs)

Employees shall not maintain or operate any other account with any other Financial Institution in their country of operations. Where exceptional circumstances require the opening or maintenance of such accounts, full details and justification must be disclosed to and approved by Conduct and Compliance before the account is operated



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Staff Employment

Employees must not take up any other paid employment while working for the Bank. Employees must not recommend or assist in employing individuals dismissed for fraud, dishonesty, or similar misconduct, or convicted of such offences.

Use of Access Bank Name

Employees shall protect the Bank's name, prevent unauthorized use, and obtain written approval before using it outside normal business activities

Co-operation with Regulatory Bodies

Employees shall fully cooperate with all authorized regulatory bodies conducting regulatory investigations relating to the Bank.

Public Statement

Employees must use discretion and comply with the Bank's Disclosure of Information Policy when making statements about the Bank

No Smoking or Drug Use Environment

Smoking and the use of illegal drugs are strictly prohibited inside all Bank premises. Smoking is only permitted in designated outdoor areas. The use of illegal drugs is not allowed at any time on Bank premises.

Compliance & Enforcements

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Sanctions

Any violation of this Code of Conduct shall result in disciplinary action by the Bank, and the Employee shall be required to correct any issues arising from the violation. Such actions shall be taken in addition to any penalties required by law.

Periodic Affirmation

All Employees shall affirm the Code at onboarding and once every year, and shall disclose any changes in relevant information when they occur.

Procedures

In all instances where Employees are required to make a report, such reports shall be made to Conduct & Compliance.



I

HEREBY AFFIRM that I have read the ACCESS BANK EMPLOYEE'S CODE OF CONDUCT and I fully understand same. I HEREBY pledge to be bound by the norms, ethics and stipulated conduct contained therein for as long as I remain in the employment of the Bank.

Dated this day of 20

Name of Employee:

Employment No:

Address:

Signature:

Witness:

Name:

Address: