

ANTI BRIBERY AND CORRUPTION POLICY

September 2025

Risk Rating: Above Average

RETURN THIS POLICY/FRAMEWORK TO CONDUCT AND COMPLIANCE AFTER APPROVAL

DOCUMENT INFORMATION

Document Owner

This document is owned by the undersigned. He/She is responsible for ensuring that the policy is reviewed in line with requirements of Policy approvals, broadcast and administration framework.

Role	Date	Version
Chief Conduct & Compliance Officer	September 2025	8.0

Prepared By	Date	Version	Comment
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1.0 INTRODUCTION

Access Bank adopts a zero-tolerance approach to bribery and corruption. The Bank conducts business affairs in a manner that shuns the use of corrupt practices or acts of bribery to obtain unfair advantage in our dealings within the markets and the communities we operate.

This policy sets out the general rules and principles we adhere to and communicate to all employees, directors, business associates as well as relevant partners, suppliers, vendors and other stakeholders the need to maintain high ethical and professional conduct while doing the Bank's business.

2.0 PURPOSE

The purpose of the anti-bribery and corruption policy is to ensure that all employees, directors, and business associates are fully aware of what constitutes bribery, the various forms it can take, and the implications of offering or accepting bribes. It aims at providing appropriate channels for reporting potential or actual bribery offenses, define criteria and set thresholds for acceptable gifts, and outline the responsibilities of all staff in upholding the organization's principles on bribery and corruption. Additionally, it establishes the applicable sanctions for policy violations to protect the organization's reputation

3.0 OBJECTIVE

The objective of this policy is to:

- Ensure that employees, directors, and business associates are fully aware of what bribery is, the different forms it can take, the implications of offering or taking bribery and the Bank's position.
- Provide appropriate channels to report potential or actual Bribery offence.
- Define criteria and set threshold for the value of acceptable gift in the organization.
- Set out Access Bank's responsibilities, and that of all staff, directors, or business associates, in observing and upholding the Bank's principles on bribery and corruption.
- Define applicable sanction for violation of the policy to protect the Bank's reputation.

4.0 PERIODIC REVIEW

In line with the risk rating of this policy, it shall be reviewed once in two (2) years, or as may be required.

4.1 DEFINITIONS OF TERMS

ERMC - Enterprise Risk Management Committee

BRMC - Board Risk Management Committee

ABC - Anti-Bribery & Corruption

ABCCO - Anti-Bribery & Corruption Compliance Officer

CCO - Chief Compliance Officer

Third Parties - Individual or organization that the Organization engages with in the ordinary course of business

4.2 RELATED DOCUMENTS

This policy should be read in conjunction with other related policies and regulations such as:

- Central Bank of Nigeria Code of Corporate Governance for Banks
- Securities and Exchange Commission Code of Ethics
- Corporate Social Responsibility Policy
- Vendor Management Policy
- Environmental and Social Risk Policy
- Anti-Fraud Policy
- Compliance Manual
- Foreign Corrupt Practices Act
- UK Anti-Bribery Act
- Requirement of ISO 37001(Anti-Bribery & Corruption Management System)

4.3 SCOPE OF THE POLICY

This Anti-Bribery and Corruption Policy is designed to comply with the Access Bank Staff Handbook, Employee Code of Professional Conduct, Outsourcing Policy, Vendor Management Policy, The Corrupt Practices and Other Related Offences Act 2000, The UK Bribery Act 2010 (UKBA), The US Legislation [Foreign Corrupt Practices Act (FCPA)], as well as compliance with all applicable anti-bribery laws covering both international and local jurisdiction.

5.0 BRIBERY AND CORRUPTION

Bribery: The offer, promise, payment, transfer, request, agreement to receive or receipt of anything of value, whether directly or indirectly, to or from any person (whether a private person, corporate entity, or public official), to induce that person (or any other person) to perform their roles improperly or, in the case of a public official, to influence them with the intention of obtaining or retaining business or an advantage in the conduct of business.

- It includes an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage through “improper performance”.

Corruption: Abuse or misuse of entrusted power or public office for private gain.

- An “Improper performance” happens when a person fails to act (1) in goodfaith, (2) impartially or (3) in accordance with a position of trust.
- Corruption is often associated with organized crime, money laundering and on some occasions the financing of terrorism. In addition, it affects the level and efficacy of investment and financing in the industrial and financial sectors, particularly within economically disadvantaged societies. It also includes diverse acts amounting to bribery and breach of ethical rules and standards.

5.1 ANTI-BRIBERY & CORRUPTION COMMITMENT STATEMENT

Access Bank PLC’s (ABP) top management has established an anti-bribery policy that is applicable in ensuring that the support to the anti-bribery management system is appropriate to the performance of ABP’s mandate as a financial institution providing corporate, Commercial, and retail Banking services.

The top management commits against any bribery activities within the bank by ensuring that all applicable anti-bribery practices are enforced and practiced at all functional levels of the bank and compliance to applicable anti-bribery obligations in alignment with the anti-bribery management system requirements.

The top management commits to an aligned anti-bribery policy to ABP’s strategic direction by ensuring that set goals are achieved through promotion of anti-bribery practices within the bank by establishing a framework for setting anti-bribery objectives at different levels of governance in ABP as follows;

- **Strategic level:** There board has formulated strategic anti-bribery objectives that are supported with documented priorities and interventions to support the strategic decision-making process in alignment with the vision statement of the Bank. The objectives are reviewed at least annually.
- **Corporate level:** The top management has established an anti-bribery policy that support the anti-bribery objectives of the organization and Bank-wide adoption in alignment with the mission statement of the organization. The objectives are reviewed at least bi-annually.
- **Operational level:** The top management has established anti-bribery objectives that are supported by formulated process-level goals based on the performance of each function within the organization. The goals are reviewed at least bi-annually.
- **Functional level:** The top management has established anti-bribery objectives that are supported by formulated and assigned targets based on the performance of individual’s KPIs. The targets are reviewed at least quarterly.

The top management commits to ensure that all employees, stakeholders, and business associates are encouraged to raise concerns in good faith, or on the basis of a reasonable belief in confidence, without fear of reprisal for any bribery

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activities that may affect the bank's operations, compliance and reputation through internal and external whistle blowing mechanisms.

The top management commits to the establishment and implementation of an independent and authoritative anti-bribery compliance function that ensures the maintenance of all applicable anti-bribery compliance obligations and practices. Any non-compliance to the applicable anti-bribery obligations will be handled as per the bank's guidelines, policies, and procedures.

The top management commits to the adoption and implementation of a continual improvement management framework for the anti-bribery management system through the establishment of a continual improvement programme supported by the monitoring and evaluation function in ABP.

The anti-bribery policy is available as a documented information to all relevant interested parties of Access Bank's ABMS.

6.0 POLICY STATEMENT

The Anti-Bribery and Corruption Policy require that Access Bank employees, directors, and business associates and other stakeholders in Nigeria and in Subsidiaries are:

1. Prohibited from offering, promising, giving, requesting, accepting or agreeing to receive a bribe of any kind in any form, directly or indirectly
2. Prohibited from making facilitation or "grease" payments, even if this represents local practice or custom.
3. Prohibited from offering, promising, or transferring anything of value to a public official to influence the public official and obtain or retain business or an advantage for the benefit of Access Bank (or to obtain or retain an advantage for any employee, any other entity or person). This includes offers, promises or transfers made to any third party (such as a public official's family members or business associates) to influence a public official.
4. Required to carry out appropriate due diligence on third parties that the Bank proposes to partner with in rendering services, or to carry out service on behalf of the Bank, and to include appropriate anti-bribery and anti-corruption clauses in contractual arrangements with such parties.
5. Prohibited from offering/giving/accepting gifts from third parties unless it is permitted by this Policy.
6. Required to adhere to the internal requirements of reporting to the CCO or ABCCO suspicion of, or attempts at, bribery and corruption or suspected or actual breaches of the Anti- Bribery and Anti-Corruption Policy.
7. Required to undertake appropriate anti-bribery and anti-corruption training and awareness programme at least once every year.
8. It is an offence for an employee not to prevent bribery and corruption cases, or not to report any actual or suspected infraction, or wrongdoing relating to bribery and corruption
9. Required that all allowable gifts received must be declared within three (3)

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working days, through Gift declaration portal, and the item deposited to the Head Office, or any other dedicated locations in the Bank for custody.

10. It prohibits the receipt cash and cash equivalent as Gift, or transfers to own account, or to the account of his/her spouse, dependent, relative, friends etc.
11. It requires the Conduct & Compliance function to manage the implementation of the Anti-Bribery & Corruption, and Gift & Hospitality program of the Bank.
12. In this policy "third party" means any individual or organization we encounter during doing business, and includes actual and potential customers, suppliers, distributors, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.
13. The policy also contains procedures for Access Bank employees, directors and business associates on how to manage the risks of facilitation payments and contains provisions on charitable donations, sponsorship, and record keeping.

7.0 RISK ASSESSMENT

Effective risk assessment lies at the very core of the success or failure of this policy. Risk identification pinpoints the specific areas which the Bank faces bribery and corruption risks and allows us to better evaluate and mitigate these risks and thereby protect the franchise. Business practices around the world can be deeply rooted in attitudes, cultures and models which Management needs to assess the vulnerability of the Bank to bribery and corruption risks. The risk assessment shall include assessment of external risks (Country, Sector, Transactions, business opportunities, and business partner's risks).

The risk assessment should be carried out on an on-going basis and is the day-to-day responsibility of ABCCO.

Access Bank shall conduct assessment of the Anti-Bribery and Corruption policy on the corporate functions and SBUs in line with annual work plan and report to the Enterprise risk Management Committee (ERMC) and the Board. This is to provide reasonable assurance that the program is functioning effectively.

7.1 OUR PRINCIPLES ANTI-BRIBERY & CORRUPTION

7.1.1 It is Access Bank policy to conduct all its business in an honest and ethical manner. The Bank adopts a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates.

7.1.2 It is the Bank's requirement that those it does business with takes a similar zero- tolerance approach to bribery and corruption.

7.1.3 The Bank is bound by the laws of Nigeria, the UK Bribery Act 2010 and all other international and local laws relevant to countering bribery and corruption in the jurisdictions in which it operates.

7.1.4 Bribery and corruption are criminal offences and are punishable for individuals by up to ten years' imprisonment and an unlimited fine which can also apply to the institution. The Bank therefore takes its legal responsibilities in this regard seriously and expects all the stakeholders to do the same.

7.2 STAKEHOLDERS AND RESPONSIBILITY

This policy will apply in Access Bank Plc business in Nigeria and all its Subsidiaries, and it is important that it be read and adhered to always. The policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, seconded staff, home workers, casual workers and agency staff, agents, channel partners or any other person associated with the bank, or any of its subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

7.2.1 Board of Directors:

- The Bank's Board of Directors shall be responsible for ensuring this policy complies with the legal and ethical obligations, and that all employees and Board members shall comply with the provision of the policy.
- The Board shall approve the anti-bribery policy of the Bank.
- Ensure that the organization's strategy and anti-bribery policy are aligned.
- At planned intervals, receiving and reviewing information about the content and operation of the organization's anti-bribery & Corruption Programme.
- Approving and allocating adequate and appropriate resources for the effective operation of the antibribery management system.
- Provide oversight on the implementation of the Bank's anti-bribery & Corruption programme by top management and its effectiveness.

7.2.2 Senior Management:

The role of Senior management with respect to the anti-bribery management system shall include:

- Establishing, Implementing, maintenance, and reviewing the anti-bribery management system, including policy and objectives to address the organization's bribery risks.
- Senior management shall be responsible for the Integration of the requirements of the anti-bribery management system requirements with the Bank's processes.
- It shall be the responsibility of Senior management to deploy adequate and appropriate resources for the effective operation of the anti-bribery management system.
- Ensuring that the anti-bribery policy is communicated both to internal and external parties
- Emphasizing and communicating the importance of effective anti-bribery management and conforming to the anti-bribery management system requirements.

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- Design the anti-bribery management system to achieve its objectives and directing personnel to contribute to the effectiveness of the anti-bribery management system.
- Promote an appropriate anti-bribery culture within the organization and ensuring continual improvement.
- Providing periodic report to the Board (if any) on the content and operation of the anti-bribery management system and of allegations of serious or systematic bribery.
- Support other management functions to demonstrate their leadership in preventing and detecting bribery in their areas of responsibility.
- Put in place a framework for setting, reviewing, and achieving anti-bribery objectives, and commit to satisfy anti-bribery management system requirements.
- Includes a commitment to continual improvement of the anti-bribery management system and explains the authority and independence of the anti-bribery compliance function and explains the consequences of not complying with the anti-bribery policy.
- Encourage the reporting of suspected and actual bribery cases. And to ensure that personnel will not suffer retaliation, discrimination or disciplinary action for reports made in good faith or based on a reasonable belief of violation or suspected violation of the Banks's anti-bribery policy, or for refusing to engage in bribery, even if such refusal can result in the Bank losing business (except where the individual participated in the violation).

7.2.3 Authority of the Anti-Bribery & Corruption Compliance Function

Relevant personnel assigned the responsibility of ensuring Compliance with the Anti-Bribery management system shall have the following:

- **Authority:** Shall be granted sufficient powers by the Board and top management to be able to undertake the compliance responsibilities effectively.
- **Approving Power:** The relevant personnel shall have power to approve or reject any Gifts and / or hospitality to be offered to, or accepted from, government officials or representatives, or politicians.
- **Independence:** Shall not personally involved in the activities of the organization which are exposed to Bribery risk.
- **Competence:** The relevant personnel must have appropriate education, training or
experience, and personal ability to deal with the requirements of the role, and the capacity to learn about the role and perform it appropriately
- **Status:** The relevant personnel must be someone of high integrity, whose opinion is respected within the organization.

7.2.4 Responsibilities of the Anti-Bribery and Corruption Compliance Officer (ABCCO).

- Develop and implement the Bank's Anti-Bribery and Corruption programme.
- Conduct an Annual Risk Assessment which identifies and assesses the internal and external risk of the Bank relating to Bribery and Corruption

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practices.

- Ensure that all employees are required to confirm understanding and compliance with the Anti-bribery and corruption policy of the bank on an annual basis.
- Ensure delivery of relevant training and awareness to employees throughout the group to support them in meeting their responsibilities.
- Providing guidance and ongoing training opportunities for vendors, suppliers, and business partners on anti-bribery and corruption
- Establish and implement an effective Anti-Bribery and Corruption monitoring programme across all risk areas in the Bank.
- Ensure that there are appropriate means to investigate and record instances or allegations of bribery/corruption in the Bank.

7.2.5 Internal Audit

Internal Audit shall conduct an audit of the Anti-Bribery and Corruption programme in line with the approved audit plan to provide information on the Anti-Bribery Management System:

- Conforms to the organization's own requirements for its Anti-Bribery Management System
- Conforms to the requirements of ISO 37001 standard
- And is effectively implemented and maintained

7.3 THE ANTI-BRIBERY & CORRUPTION PROGRAM

The Anti-Bribery and corruption program of the Bank will include:

- **Tone at the Top:** The Board and management shall commit to Anti-Bribery and Corruption activities through the provision of strategic direction and approvals.
- **Policy & Procedure:** There will be Board approved policy on Anti-Bribery and Corruption in the Bank.
- **Anti-Bribery and Corruption resource person:** The Bank will dedicate a senior management staff as the Anti-Bribery and Corruption officer.
- **Training & Awareness:** There shall be annual and continual training and awareness on Anti-Bribery and corruption for all employees, Board members and third parties.
- **Bribery Risk Assessment:** The risk that each corporate functions and SBUs exposed to, shall be reassessed at planned interval.
- **Third Party Agreement & SLA:** Anti-Bribery & corruption clauses shall be incorporated in all the Bank's agreement, SLA or contracts with third parties.
- **Define threshold for Acceptable Gift:** The Value of acceptable Gift and hospitality shall be defined from time to time.
- The Bank shall continually improve its ABC program by benchmarking it with International best practices.

7.4 GIFTS AND HOSPITALITY

Gift - Anything of value offered by one person to another voluntarily, and without expecting payment or anything in return. Gifts could take the form of physical items such as books, jewelry, clothes, money, etc., It could also take the form of experience like a trip, tickets, to an event, a special meal, etc.

Gifts can also be offered in the form of intangible items like time, help, kindness, knowledge, love, etc.

Hospitality- A friendly and generous way of receiving and taking care of guests, visitors, or strangers. It involved welcoming others warmly, with kindness and respect, providing comfort like foods, drinks, and shelter, or creating pleasant environment where guests feel valued and care for.

7.4.1 OUR PRINCIPLE ON GIFT & HOSPITALITY

7.4.2 In consideration of services rendered, being rendered or to be rendered, employees shall not ask for/receive employment, service, gratuity, cash, property or anything of value for their personal benefit or advantage or for that of their spouses and dependents from a customer of, or supplier to the Bank.

7.4.3 While it is recognized that exchange of gift is customary during festive seasons e.g., Christmas/New Year, Id.-el-Fitri and Id-el-Kabir, Easter, as well as during Celebrations such as Birthday, Wedding, naming etc., employees shall not during these seasons, or at any time accept gift of any kind from customer, Vendor or supplier whose value exceeds:

For Senior Managers and above – N150,000.00

All Other Employees – N50,000.00

7.4.4 In circumstances where refusal of gifts that is **above** the defined threshold would adversely affect the relationship of the giver with the Bank, the employee shall accept the and deliver such gift.

7.4.5 Irrespective of the value of Gift, all allowable gifts received must be declared through Gift declaration portal and dispatched to Conduct & Compliance department at the Head Office, or any other dedicated locations in the Bank for custody.

7.4.6 Gifts in hampers and other related forms received shall be declared through the gift declaration portal item by item and segregated into perishable and non-perishable.

7.4.7 Treatment of perishable items received as Gift shall be advised by the Conduct & Compliance, upon declaration through the portal.

7.4.8 Employees shall not receive cash and cash equivalent as Gift, or transfers to own account, or to the account of his/her spouse, dependent, relative, friends etc.

7.4.9 All Gift items declared shall be auctioned not later than 1st quarter of the following

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year, under the supervision of the Anti-Bribery & Corruption Compliance Officer, the Chief Compliance Officer, and representative from Legal Unit.

7.4.10 Proceed from the Gift auctioned shall be deposited in a dedicated CASA account called "GIFT DECLARATION A/C === 0694119033 -NGN, and 0694119040 - USD. This will be donated to charity or shared amongst the top 10 CSR projects based on the Bank's policy.

7.4.11 Where employees are in doubt regarding the value of the Gift received, such gift shall be declared through the gift declaration portal and dispatched to Conduct & Compliance in Head office, or any other dedicated location for Custody.

7.4.12 All Gift received in any location shall be declared within 3 working days.

7.4.13 Item of value received as Gift outside Lagos shall be warehoused in the Branch Vault, where it will be dispatched to Conduct & compliance in the Head Office quarterly.

7.4.14 Branch manager/Head of Operation shall maintain a register to record item of Value deposited in the vault, where every movement would be approved.

7.4.15 In every case and regardless of time or season, employees shall make every effort to discern whether any gift is truly a gift or an inducement, and in the case of the latter, employees shall treat the Gift as stated in section 7.4.5

7.4.16 Giving or receiving gifts and hospitality is not prohibited, if the following requirements are met:

- a) The value is within the approved threshold, and it is declared.
- b) It is not made with the intention of influencing, inducing, or rewarding a third party to gain any advantage through improper performance, or in explicit or implicit exchange for favours or benefits.
- c) It complies with relevant laws.
- d) It is appropriate in the circumstances.
- e) Considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time provided the Bank is not participating in any tendering process with the recipient.
- f) Gifts and / or hospitality are not offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the ABCCO.

Gifts in hampers and other related forms received at any time shall be declared through the gift declaration portal. The declaration shall be per items segregated into perishable and non-perishable.

8.0 FACILITATION PAYMENTS

- i. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

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- ii. Kickbacks are typically payments made in return for a business favour or advantage. All employees, directors, and business associates must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.
- iii. If an employee or director or agent is asked to make a payment on behalf of the Bank, the purpose should be known, and the amount should be proportionate to the goods or services provided. If there are suspicions, concerns or queries regarding a payment, this should be referred to the CCO or ABCCO.
- iv. Whilst the law prohibits facilitation payments or kickbacks, no employee or director or business associate is required to place his/her professional integrity at risk. Any such incidents should be reported through the Whistleblowing channels.

8.1 DONATIONS

We do not make contributions to political parties for the pursuit of their objectives. The Bank only makes charitable donations that are legal and ethical under local laws and practices. Requests for sponsorship and donations should be forwarded to the Head, Corporate Communications and the ABCCO for approval on a case-by-case basis.

8.2 SANCTION FOR BREACH OF POLICY

Failure by any employee, director, agents, representative or associates to comply with the policy requirements will lead to disciplinary action, up to and including dismissal or termination of employment or backlisted. All violations shall be investigated by internal audit -Investigation, and applicable sanction recommended in line with the provision of the consequence management framework.

8.3 REVOLVING DOOR

The term 'revolving door' refers to the movement of individuals (Staff, 3rd Party Vendor, Agent etc) between positions of public office and jobs in the bank or in either direction. A cooling off period is the minimum time required between switching from the bank to the public sector or vice versa. The minimum cooling period for the bank shall be 3years after a comprehensive, transparent, and formal assessment procedure which assesses whether post- public office employment is compatible with former duties of the individual employee, 3rd Party Vendor, Agent. This is intended to discourage the practice and minimize its impact.

8.4 RECORD-KEEPING

- i. Compliance shall have a dedicated store to warehouse the Gift declared. Record of item of value declared and dispatched to the Head Office shall be maintained, to complement the record of gift declared on the Gift declaration portal. Entry to the store, and updating the Gift register shall be under dual control

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- ii. The Bank shall keep financial records and have appropriate internal controls in place, which will provide a business reason for making payments in respect of donations, hospitality, gifts, etc. to third parties.
- iii. The Bank will ensure all expense payments relating to donations, hospitality, gifts to third parties are submitted in accordance with the Expense Policy and specifically record the reason for the expenditure.
- iv. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

8.5 AWARENESS AND TRAINING

All employees shall undertake appropriate Anti-Bribery and Corruption training at least once a year. In partnership with Compliance, Vendor Management Unit will conduct this training for third parties including all our active Vendors annually.

8.6 COMMUNICATIONS

All Access Bank's internal and external communication shall emphasize the Bank's commitment to anti-bribery and corruption practices. Staff will be notified of changes to this policy via emails, fliers and Prism and any other approved channels.

8.7 INVESTIGATION OF BRIBERY CASE

Internal Audit Investigation shall be responsible for the investigation of any case of Bribery act within the organization, and those involving third parties. In the event that the investigation reveals any bribery, or violation of the anti-bribery policy or the anti-bribery management system, appropriate action shall be taken against the culpable person in line with the Bank's Consequence Management Framework.

In all cases, investigation and outcome shall be made confidential.

9.0 WHAT IS NOT ACCEPTABLE?

In addition to the above, it is not acceptable for employees or directors or business associates to:

- i. give, promise to give, or offer, a payment, gift or hospitality with the intention of influencing, inducing or rewarding improper performance.
- ii. Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite routine procedures (where the payment is not a legitimate payment pursuant to local written law);
- iii. Accept from a third party, payment that you know, or suspect is offered with the expectation that it will obtain a business advantage for them which will be obtained through improper performance by the employee or Directors.
- iv. Accepting gift or hospitality from a third party if it is known or suspected that it is offered or provided with the intention of influencing improper performance

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- v. Threaten or retaliate against another employee/director who has refused to commit a bribery offence or who has raised concerns under this policy.
- vi. Engage in any activity that might lead to a breach of this policy in any respect.

9.1 RAISING A CONCERN

Employees, Directors and all Stakeholders are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If there are doubts whether an act constitutes bribery or corruption, or any other queries, these should be raised with the CCO or ABCCO

9.2 PROTECTION

Employees, Directors and all Stakeholders that refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are free from repercussions as they have acted in good faith, the whistleblowing line will be helpful.

9.3 WHISTLEBLOWING

Whistle blowing refers to the practice of reporting wrongdoing or unethical behavior in an organization. The purpose of the whistle blowing program is to encourage employees to disclose any malpractice or misconduct while their identity is protected as confidentiality is key to the effective implementation of a whistle blowing program.

The objective of having Whistleblowing line is to encourage employees to confidently raise concerns about unethical violation of the bank's policies and breach of professional codes of conduct. It reassures the whistle blower's protection from possible reprisals or victimization if a disclosure is made in good faith.

All employees, directors, business associates and all stakeholders are encouraged to raise genuine concerns about misconduct, malpractice, and unethical behavior at the earliest opportunity and in an appropriate way.

Please refer to the Whistleblowing policy for the reporting channels and other details.

9.4 POTENTIAL RISK SCENARIOS: BRIBERY AND CORRUPTION INDICATORS

Below are possible scenarios that could indicate the presence of potential, or actual Bribery cases where employees, Directors or third parties may raise concerns under various anti- bribery and anti-corruption laws.

The list is not exhaustive; it is for illustrative purposes only to provide help in complying with this policy, such that If any of the scenarios is noticed, it should be promptly reported through any of the Whistleblowing channels

- a) He/she becomes aware that a third party engages in, or has been accused of engaging in, improper business practices.
- b) He/she learns that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
- c) A third party insists on receiving a commission or fee payment before

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- committing to sign up to a contract with us or carrying out a government function or process for the Bank.
- d) A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment
 - e) A third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business.
 - f) A third party requests an unexpected additional fee or commission to "facilitate" a service.
 - g) A third party demands entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
 - h) A third-party request that a payment is made to "overlook" potential legal violations.
 - i) an invoice from a third party that appears to be non-standard or customized.
 - j) A third-party refuse to put contractual terms agreed in writing.
 - k) he/she notices that the Bank has been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
 - l) he/she is offered an unusually generous gift or offered lavish hospitality by a third party.

9.5 Activities Carried out to deepen ABC, Conduct and Ethics Compliance.

The activities below should be continuously embarked on in order to deepen Anti-Bribery and Corruption (ABC), Conduct and Ethics Compliance:

S/N	ADEQUATE PROCEDURES	ACTION PLAN
1	Tone at the top	Continuous action
2	Communication (Training and Awareness)	Continuous action
3	ABC Risk Assessment	Continues action.
4	Monitoring/Review/Reporting and Mitigation.	Continuous action

10.0 ANTI BRIBERY AND CORRUPTION RISK ASSESSMENT METRICS

10.1 Impact Scoring

An impact score is assigned to a regulatory requirement applicable to a business unit based on the effect of a potential breach of that regulation to the bank either from a cost perspective (fine), reputational perspective etc. Access Bank has defined its impact scoring in its Enterprise Risk Management Framework as follows:

Table 1 Impact Scoring

Score	Impact Assessment	Description of Impact Assessment
5	Significant	Above 0.2% of SF
4	High	B/w 0.01% and 0.2% of SF
3	Medium	B/w 0.001% and 0.01% of SF
2	Minor	B/w 0.0001% and 0.001% of SF
1	Insignificant	Below 0.0001% of SF

10.2 Likelihood Scoring

The likelihood score indicates the tendency/probability of occurrence of a material breach based on the activities of the Bank. Access Bank has defined its likelihood scoring in its Enterprise Risk Management Framework as follows:

Table 2 Likelihood Scoring

Score	Likelihood Assessment	Definition of Likelihood Assessment	Definition of Frequency
5	Almost Certain	Will occur in most circumstances	At least monthly
4	Likely	Probably occur in most circumstances	Once in a quarter
3	Possible	Should occur at some time	Annually
2	Unlikely	May occur at some time	Once in every 5 years
1	Rare	May occur in exceptional circumstances	Once in 10 years

10.3 Control Scoring

Control scoring entails the review of the Bank's control processes in line with the applicable assessment area to determine the effectiveness in mitigating associated risk. Access Bank has defined its control scoring based on its Enterprise Risk Management Framework as follows:

Table 3 Control Scoring

Score	Control Assessment	Description of Control Assessment
5	Satisfactory	Overall control process is objective and operating effectively to mitigate risk
4	Needs Minor Improvement	The control process is operating effectively, however there are opportunities for minor improvements to the control
3	Needs Improvement	The control process needs improvement, the issues identified have/could have a negative impact on the compliance risk control environment.
2	Needs Significant Improvement	The control process requires significant improvement, the issues identified could have a material negative impact on the compliance risk control environment
1	Unsatisfactory	The control is largely ineffective. Significant issues were identified that have/could have a material negative impact on the risk control environment.

10.4 Inherent Risk

Inherent risk is the risk posed by an error where there are absolutely no controls put in place to mitigate the occurrence of such error. The formula for computing inherent risk is given

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below as:

$$\text{Inherent Risk} = \text{Impact Score} \times \text{Likelihood Score}$$

The table below highlights the inherent risk grid using the impact and likelihood scoring scales.

Table 4 Inherent Risk

Inherent Risk Grid		Impact Scale				
		1	2	3	4	5
Likelihood Scale	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5

10.5 Residual Risk

Residual risk is the level of risk present after existence of controls are accounted for, such as policies, secondary reviews etc. The formula for computing the residual risk is given below:

$$\text{Residual Risk} = [(\text{Impact Score} \times \text{Likelihood Score}) \times (1 - \text{Control Score}/5)] + [0.2 \times (\text{Impact Score} \times \text{Likelihood Score})]$$

Once the score is computed, the following risk rating grid can be used to determine risk levels as well as determine corrective action:

Table 5 Residual Risk

Risk Grade	Description of Risk Grade
Low	Under Control (Accept)
Moderate	May breach risk appetite, controls can be improved (Monitor controls)
Above Average	Threatening to breach risk appetite, controls failing (Monitor risk and controls)
High	Has breached risk appetite, Failed controls (Improve risk and controls)

10.6 FREQUENCY

The Bank shall conduct the initial compliance risk assessment across all its departments and units to determine the compliance risk exposure. Subsequently, information from previous exercises relating to the risk rating of business units is used to determine the

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frequency of the exercise. The table below provides a guide to the frequency of the exercise based on the prior assessment risk ratings

Table 6 Frequency of Conducting Compliance Risk Assessment Exercise

Risk Grade	Frequency of assessment
Low	24months to 36months
Moderate	12months to 24months
Above Average	6months to 12months
High	3months to 6months

10.7 REPORTING

To provide reasonable assurance that the Bank manages its Bribery & Corruption risk effectively, the outcome and report of the risk assessment conducted shall be sent to the Head of the Business Unit/Corporate functions assessed. The risk assessment score shall form part of the compliance metric to be monitored and reported at the ERM/BRMC.

The report on all Gifts declared shall be prepared annually, highlighting the number and value, and the treatment.

10.8 NEGATIVE RESPONSES

The residual risk score determined from the risk assessment conducted for a business unit shall be reviewed to determine if there are negative responses.

Where there is a negative response that suggests obvious presence of Bribery risk in the business process examined, such responses shall be sent to internal audit for investigation.