

Type:	<i>Policy Summary</i>
Name:	Anti-Bribery and Corruption
Key search terms:	Code of Conduct/ Ethics/ Fraud Management

1 Policy Statement

The business of Standard Bank Group Limited (the Group) is built on trust and integrity, and this vision is shared by our stakeholders, especially our clients, shareholders and regulators. The Group conducts its business in accordance with the Values and Code of Ethics that the Group has adopted, ensuring trust and integrity. It is wholly unacceptable for the Group and its associated persons to be involved or implicated in any way in bribery, or in any corrupt practice.

2 Policy Scope

The Group Anti-Bribery and Corruption Policy summary is designed to comply with applicable statutory and regulatory obligations across the Group. This summary applies to all entities and employees of the Group, regardless of location or business unit. This policy summary reflects the Group's minimum requirements in respect of anti-bribery and corruption controls and may be supplemented in a local jurisdiction/business line policy, procedure or related governance document, where more stringent legislative or regulatory requirements are in evidence.

3 Purpose of this policy

Effective implementation of this policy will ensure that:

- The Group prohibits bribery and corruption in dealings with the public, private and non-profit sectors.
- Parameters are provided around what is considered an act of bribery.
- To provide clarity that a bribe that could be to incentivise a person to do, or to not do something related to performing their duties, in return for some form of gratification.
- To define various acts that are considered to constitute corruption and bribery. This is not restricted to cash and includes gifts, entertainment such as tickets to sporting events or overseas travel, or payment of school fees.

4 Roles and Responsibilities

- The Group board of directors, and the boards of each of the Group's subsidiary companies, must ensure that an effective framework for managing ABC compliance risk is in place in the Group, and subsidiary companies respectively.
- The Group's anti-bribery systems and controls include this summary, which emphasises that the Group prohibits the giving or receiving of bribes, and the making of facilitation payments by any associated person.
- This policy summary provides guidance to employees regarding the appropriate response to payments extorted under duress.
- The Group ensures availability of appropriate risk-based training, awareness, communication and/or guidance to all associated persons subject to this policy.

The Group's systems and controls also impose the following requirements on the activities of its employees and third parties acting on its behalf:

- **Gifts, hospitality and expenses:** All gifts and entertainment must be given and received in accordance with the Gifts and Entertainment Policy. The Group prohibits gifts and entertainment which are given and/or received in breach of any Group policy. The Group cautions against the offering or receiving of gifts, entertainment, or other gratification to/by any associated person, client or any public official.
- **Charitable donations:** Charitable donations on behalf of the Group may only be offered or given in accordance with the principles set out in the **Charitable donations policy**.
- **Political contributions:** Standard Bank will not make donations or sponsor political parties, affiliated organisations or political campaigns outside of the terms of Standard Bank's Democracy Support Programme (see policy on this programme).
- Group Procurement and Group Human Capital will maintain policies and procedures concerning the appointment of associated persons, to ensure that such persons are appointed in a legal, ethical and professional manner, in compliance with the policy.
- The Group maintains clear incident reporting and whistleblowing policies and procedures to ensure that individuals can confidentially report concerns, and to ensure that such concerns are investigated and resolved appropriately.
- Any associated person or client of the Group who has a reasonable belief that there is an incident or impending incident which shows wrongdoing within or on behalf of the Group, can raise a concern via the Whistleblowing Helpline. The Group

whistleblowing hotline number is +27 12 543 5885 and the e-mail address is whistleblowingline@kpmg.co.za.

- Internal audit and monitoring functions provide assurance to the board and management that bribery and corruption risks and associated controls are managed by the Group in an effective way.