

Access Bank South Africa Limited

SUPPLIER CODE OF CONDUCT

CONTENTS

- 1. PURPOSE AND SCOPE**
- 2. BUSINESS INTEGRITY**
 - 2.1 Laws, Regulations and Standards**
 - 2.2 Conflicts of Interest**
 - 2.3 Gifts and Entertainment**
 - 2.4 Anti-bribery and anti-corruption**
 - 2.5 Confidentiality**
- 3. ENVIRONMENT**
 - 3.1 Resources and waste**
- 4. RESPONSIBLE TREATMENT OF INDIVIDUALS**
 - 4.1 Diversity and inclusion**
 - 4.2 Human Rights and Employment practices**
 - 4.3 Health and safety**
- 5. SOCIETY**
- 6. RESPONSIBLE BUSINESS PRACTICES**
 - 6.1 Privacy and information security**
 - 6.2 Business resumption and contingency planning**
 - 6.3 Outsourcing and subcontracting**
 - 6.4 Avoidance of banned or disputed products and services**
- 7. RAISING A CONCERN**
- 8. MONITORING AND DUE DILIGENCE**

1. PURPOSE AND SCOPE

- 1.1 Access Bank SA is committed to a policy of fair dealing and integrity in the conduct of its business. This commitment, which is actively endorsed by the Board of Directors (“the Board”) of Access Bank SA, is based on a fundamental belief that business should be conducted honestly, fairly and legally.
- 1.2 Access Bank SA upholds the protection of human rights as contained in the Bill of Rights and South African Constitution and therefore embrace and support the values pertaining to human rights.
- 1.3 This Supplier Code of Conduct (“Code”) sets out our (“Access Bank SA’s”) principles and expectations as to how companies that supply goods and services to Access Bank SA (“Suppliers”), including their representatives and employees (together “Supplier’s employees”) are to conduct business and deal with the Bank.
- 1.4 The Bank offers financial service to drive economic growth and development in South Africa.
- 1.5 Access Bank SA is committed to continuously improve a compliance and an ethical culture that is driven by Access Bank SA core values:

Leadership

- Leading by example, leading with confidence
- Being the first, being the best and sometimes being the only
- Having the courage to be the change we want to see
- Setting the standard
- Challenging the status quo
- Being a market leader

Excellence

- Surpassing ordinary standards to be the best in all that we do. Simply put, being exceptional
- Setting the standard for what it means to be exceptional
- Never losing sight of our commitment to excellence regardless of the situation
- Remaining dedicated and committed to our vision
- Ensuring our actions are economically, environmentally and socially responsible

Empowered employees

- Recruiting and retaining the best people
- Encouraging a sense of ownership at individual level and team spirit for combined efforts
- Promoting a sense of belonging and a conducive working environment
- Providing continuous platforms for training
- Paying attention to staff healthcare
- Promoting work-life balance
- Zero discrimination against religion, gender, tribe etc

Passion for customers

- We live to serve our customers
- In addition to delivering excellent customer service, we will be focusing on:
- Providing fair treatment for ALL customers
- Supporting customer businesses
- Educating customers on products, services and industry trends
- Expanding banking reach to the under banked/unbanked

Professionalism

- Putting our best foot forward in everything we do at all times
- Putting customers’ needs first
- Bringing the best of our knowledge and expertise when dealing with stakeholders
- Applying the highest standards in treating internal and external customers
- Maintaining composure and clear thinking at all times
- Maintaining a positive “can-do” attitude at all times

Innovation

- Identifying new market needs and opportunities
- Creativity, invention, inspiration, exploration
- Pioneering new ways of doing things
- Being first, testing the waters, pushing boundaries
- Anticipating and responding quickly and accurately to market/customer needs

1.6 The bank and all its employees, have a duty to comply with applicable laws and regulations, and is expected to behave responsibly and ethically. Suppliers are expected to operate with values comparable to ours and in a manner that is consistent with prudent business practices.

1.7 "Supplier" means any firm or individual that provides a product or service to Access Bank South Africa Limited, its subsidiaries or to any of its clients, directly or indirectly. The term includes investors of the Bank.

2. BUSINESS INTEGRITY

2.1 Laws, Regulations and Standards

The Bank strives to connect its strengths with its Suppliers' competencies to make full use of the opportunities sustainable development offers. This also implies that the Bank expects its Suppliers, as well as their suppliers and subcontractors to fully comply with applicable laws and adhere to internationally recognized environmental, social and corporate governance standards.

2.2 Conflicts of Interest

Suppliers are prohibited from seeking preferential treatment or exploiting their relationships with our employees, such as being our client, for improper advantage. It is mandatory for Suppliers to disclose any potential conflicts of interest during tender or contracting procedures, or as and when they occur.

2.3 Gifts and Entertainment

Suppliers should not use gifts or entertainment, and its quality, quantity or timing, to gain preferential treatment or improper advantage. The Bank expects Suppliers to keep appropriate records of exchanges of gifts and entertainment with our employees. Gifts and gratuities include (but are not limited to), vouchers, airtime, liquor, electronics, clothes, food, beverages, promotional items and product discounts, and any other benefits that are not extended to all Access Bank SA employees.

2.4 Anti-bribery and anti-corruption

Suppliers also have a responsibility to work against corruption, including bribery and ensure that personal relationships do not affect business activities. Suppliers must abstain from all money-laundering activities, like for example; Real-estate laundering, casino laundering, trade-based, layering, laundering money through cash businesses, etc.

2.5 Confidentiality

Should Suppliers become aware of confidential information during dealings with the Bank about the Bank or its clients, it is expected to have policies and procedures in place for the proper handling and use of that information e.g., information barriers. These policies and procedures must meet the applicable legal and regulatory requirements to prevent inappropriate access to or disclosure of confidential information. Where applicable, Suppliers will also have to enter into a non-disclosure agreement with Access Bank SA.

3. ENVIRONMENT

Suppliers should comply with all applicable environmental, health and safety regulations. The Bank encourages its suppliers to join similar environmental effort of implementing Environmental Management Systems (EMS) as appropriate to their businesses, and align with best practice activities including the setting of environmental targets, reducing environmental impacts and reporting on progress made. Due diligence is conducted before onboarding of Suppliers.

3.1 Resources and waste

The Bank's Suppliers should use resources efficiently, apply energy-efficient, environmentally friendly technologies and reduce waste, as well as emissions to air, water and soil. Our Suppliers should minimize their impact on biodiversity, climate change and water scarcity.

4. RESPONSIBLE TREATMENT OF INDIVIDUALS

Suppliers must abide by the applicable employment standards, labour, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or where they allow for differential treatment, we expect

Suppliers to be committed to non-discrimination principles and not to operate in a way that differentiates unfairly.

4.1 Diversity and inclusion

Suppliers must maintain workplaces characterised by professionalism and respect for the dignity of every individual with whom their employees interact. Suppliers must respect the diversity of their employees, clients and others with whom they interact, including respect for profile, language, religion and gender. Suppliers must not tolerate harassment, discrimination, violence, retaliation and other disrespectful and inappropriate behaviour. Suppliers must respect the dignity of their own employees and others and maintain a respectful workplace that values diversity.

4.2 Human Rights and Employment practices

The Bank's Suppliers support the protection of internationally proclaimed human rights, including minimum wage and working hours. They must ensure that all work is completed voluntarily and without slavery, servitude, forced or compulsory labour and human trafficking.

Suppliers must be able to demonstrate that, in their workplaces:

- child labour is not employed;
- discrimination and harassment are prohibited, the rights of workers to exercise freedom of association and collective bargaining are respected;
- demonstration of formal mechanisms allowing employees to raise concerns of operational or business practices that violate laws, regulations or company values and for the concerns to be properly filed, addressed and resolved without the fear of retaliation;
- demonstration of formal mechanisms allowing employee grievances regarding human and labour rights violations to be properly filed, addressed and resolved without fear of perceived or actual retaliation;
- all workers are entitled to work and be paid for a minimum level of working hours; that working hours are not excessive; and that maximum working hours comply with national laws; and
- reasonable background screenings, including investigations for prior criminal activity, have been done to ensure the integrity and good character of the Supplier's employees Clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements

4.3 Health and safety

The Bank expects Suppliers to provide a safe and hygienic working environment through proactive management and controls that minimise health and safety risks and support accident prevention. They must comply with relevant health and safety laws, to provide all their employees with adequate information and instruction on health and safety concerns and to enable their employees to meet their responsibilities for the maintenance of a healthy and safe workplace. The Bank expects its Suppliers to protect their employees and neighbours' life and health, as well as the public at large against hazards inherent in their processes, products and services.

5. SOCIETY

Access Bank SA recognises the impact that its procurement practices may have on local society. The Bank encourages its suppliers to avoid decisions that may have a negative social or economic impact on society, including local development. Suppliers should be able to demonstrate employee or corporate initiatives designed to improve the social and economic conditions of those within the local/regional geography. They must demonstrate avoidance of negative impacts resulting from activities considered detrimental to local society, such as encroachment and displacement of indigenous people.

6. RESPONSIBLE BUSINESS PRACTICES

6.1 Privacy and information security

Suppliers must comply with the Protection of Personal Information Act and Regulations (POPI), which seeks to regulate the processing of personal information, and must use any information obtained through their relationship with the Bank only for the purpose defined to them. Suppliers must process information as per the obligations in the POPI Act and have appropriate information security policies and procedures in place to secure access to the Bank's information. Suppliers must notify the Bank promptly of actual or suspected privacy breaches, security breaches, or losses of our information.

6.2 Business resumption and contingency planning

For some services performed by Suppliers, due to the significance to the Bank's operations or the types of activities that may be involved, the Bank expects that the Supplier's business continuity and disaster recovery plans are developed, maintained and tested in accordance with the applicable regulatory, contractual and service-level requirements.

6.3 Outsourcing and subcontracting

The Bank recognises that outsourcing is a practice that Suppliers may use to promote innovation, fill resource gaps, and/or create operational efficiencies. It also recognises that Suppliers may need to use subcontractors in the performance of services. However, Suppliers are expected not to subcontract the services that they perform or outsource activities that directly affect the delivery of goods and services to the Bank, without prior written approval. In situations where approval is given, it is important to know the locations of where the work will be performed and the parties involved in the provision of the services. In addition, Suppliers must monitor the outsourcing or subcontracting arrangement to ensure it complies with the Suppliers' contractual obligations and with this Code and must be able to provide evidence of such monitoring upon request.

6.4 Avoidance of banned or disputed products and services

Suppliers must avoid the sale, use, marketing, communications, including advertising, promotion and sponsorship, of banned or disputed products or services as defined by regulations and voluntary codes.

7. RAISING A CONCERN

Access Bank SA is committed to conducting all its business activities ethically and in accordance with applicable laws and regulations, and the highest professional standards. Integrity in our business behaviour and in our management, systems is crucial to the success of Access Bank SA, its customers and shareholders, as well as the fulfilment of its corporate responsibilities.

Access Bank SA Whistleblowing Policy reflects the Bank's commitment to ensuring that concerns of potential breaches of laws, rules, regulations or compliance policy raised in good faith are handled in an appropriate manner and rectified as necessary. Whistleblowing is the process through which one can report, in confidence, such breaches. This could mean fraud, criminal behaviour, ethical issues, behaviour that is not in keeping with stated values, or breaches of financial services, health and safety or regulatory obligations – or the deliberate concealment of any of those things.

The Bank expects its suppliers to strongly encourage employees to raise concerns (whistle blow) to Access Bank SA about inappropriate conduct by Access Bank SA or its employees and to make them aware of the process of reporting inappropriate conduct.

The Bank's Suppliers and sub-contractors can raise any concerns in confidence or anonymously (where permitted) through Tip-offs Anonymous. The hot line for raising concerns is administered independently by Deloitte.

Toll-free call number: 0800 22 44 63 (Whistleblowing Policy) or Access Bank SA Forensics: (011) 634-4388 (office hours only) - You do not pay for the cost of the call. Unique e-mail: fraudprevention@accessbankplc.com.

If you have access to Internet, you may log an anonymous report by logging onto the Tip-offs Anonymous Website at www.tip-offs.com.

8. MONITORING AND DUE DILIGENCE

Our relationship with Suppliers is based on mutual trust and respect. Suppliers may also demonstrate their commitment to these principles through compliance with its own code of conduct or company policies that embrace these standards. Access Bank SA has a responsibility to conduct appropriate due diligence before entering relationships with key suppliers. This may include, but is not limited to, reviewing copies of employment and health and safety policies and undertaking due diligence with the aim of establishing that none of our suppliers have any association with modern slavery and that they have not been engaged in any activity with an adverse human rights impact.

All suppliers are expected to self-monitor their compliance with Access Bank SA's supplier code of conduct and inform the Bank of any non-compliance within 24 hours. We expect Suppliers to comply with this Code. For some services, because of their significance for the Bank's business and the type of activities involved, the Bank may require a Supplier to periodically confirm in writing to its Procurement department that they meet the requirements of this Code. All suppliers are required to provide the Bank with about the level of compliance to the Bank's Supplier code of Conduct. In addition, the Bank must be able to monitor and audit a Supplier's control environment at least on an annual basis. Failure to comply with this Code may result in termination of a Supplier's relationship with the Bank.