



# FirstRand

## FIRSTRAND ETHICS LINE POLICY STATEMENT

### INTRODUCTION

FirstRand Limited (FirstRand or the group) is a portfolio of integrated financial services businesses operating in South Africa, certain markets in sub-Saharan Africa and the UK.

FirstRand is committed to fair dealing and integrity in the way it conducts business. This commitment is founded on the belief that business must be conducted honestly, fairly and within the framework of applicable laws.

FirstRand seeks to proactively protect its people and the funds and resources under its custodianship from abuse or misdirection. Ethics line reporting at FirstRand means alerting the appropriate people of the unethical conduct (or suspected unethical conduct) of another person in the business, either alone or in concert with external persons. Reporting unethical conduct by using the independent ethics line is an act of care and loyalty to the group and its employees, customers, suppliers, shareholders and all other stakeholders.

### PURPOSE

This policy statement summarises FirstRand's approach to reporting unethical conduct and the protection of those who report unethical conduct (whistle-blowers). This policy statement is supported by detailed underlying internal policies, as outlined below.

### APPROACH

FirstRand is committed to investigating and addressing all cases of reported unethical conduct. The FirstRand ethics line policy (the policy) is intended to:

- clarify which types of unethical conduct are reportable;
- communicate and give assurance of FirstRand's commitment to protected disclosures;
- give assurance that FirstRand will do everything in its power to ensure that people who report unethical conduct in good faith are not retaliated against or victimised;
- inform current and former employees as well as temporary and contingent workers (hereafter collectively referred to as "employees") of the various ways of making a protected disclosure and to give clarity on these processes; and
- indicate what FirstRand's responsibilities are when receiving an ethics line report and what actions it will take.

## Scope

The policy applies to all entities and operating businesses that form part of the FirstRand group of companies and their employees.

## Reporting unethical conduct

Reporting unethical conduct is to alert an independent third party that someone has done, or is doing, or intends to, or is suspected of planning to do, something wrong. Employees, suppliers and interested parties in all regions in which the group operates, who know of unethical conduct associated with group activities, or who have reasonable grounds for inferring unethical conduct, are strongly encouraged to report this, using their preferred reporting channel.

There are various ways of raising a concern or of reporting unethical conduct. The avenue chosen will depend on the offence, the seriousness of the unethical conduct report and which of the channels the reporter is most comfortable with.

Any unethical conduct or illegal activity can be reported to the independent ethics line, which is managed by an independent third party. FirstRand utilises an independent third party to provide reporters of unethical conduct with the necessary assurance that the report will be received independently and objectively recorded on an external system. Guidelines and advice on how to go about this are addressed in employee training, education, communication and an awareness programme related to the policy.

FirstRand carries out formal investigations when there is reason to believe that improper acts have been committed.

## Reporter protection

Confidential, partially anonymous, and anonymous types of disclosures are aimed at ensuring safe reporting. Reporter protection is important because those who benefit from unethical conduct may attempt to retaliate against or victimise those who courageously report unethical conduct. This victimisation would materialise if the identity of the reporter became known through a breach of confidentiality. As such, FirstRand takes the necessary steps to ensure anonymity is protected, but also relies on the reporter to protect their anonymity.

Reporters of unethical conduct play a valuable role in promoting accountability and risk visibility. FirstRand gives the assurance that retaliation against any person who makes reports in good faith will not be tolerated. FirstRand promotes a work environment free of victimisation. There are consequences to victimisation, including management action.

FirstRand maintains the necessary internal and external systems and procedures to protect the interests of reporters of unethical conduct. In addition, the South African Protected Disclosures Act (the Act) provides legal protection against occupational detriment for those who report unethical conduct in good faith. Where a FirstRand business operates in a country with local protected disclosure legislation, it must be complied with, in addition to the Act. The group's principle is to apply the higher of home or host obligations.

In terms of the Act, employees who make a protected disclosure in good faith will have legal recourse if they face occupational detriment.

The Act only applies to employer-employee relationships. In other words, reporters can only get protection under the Act against occupational detriment if they are or were, directly or indirectly, employed by the entity where they reported unethical conduct.

Reporting does not protect a reporter of unethical conduct from being subjected to legitimate disciplinary processes or prosecution. For example, reporting unethical conduct cannot be used to escape the consequences of the intentional submission of a false or malicious report.

### **MONITORING AND REPORTING**

The FirstRand Group Ethics Office is responsible for oversight of the uniformity of implementation of the policy. The head of each operating business within FirstRand is responsible for ensuring integration of the policy in the day-to-day activities of their business areas. Periodic feedback is provided to the appropriate group governance structures and the board, as appropriate.

### **ENGAGEMENT AND FEEDBACK**

Contact FirstRand Investor Relations on [investor.relations@firstrand.co.za](mailto:investor.relations@firstrand.co.za).