

Whistleblowing EthicsPoint - FAQ

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About EthicsPoint

1. What is EthicsPoint?

EthicsPoint is a comprehensive and independently hosted whistleblowing reporting platform accessible by employees and external stakeholders. EthicsPoint was created by NAVEX Global to provide a channel to confidentially report misconduct, thereby assisting the company to address issues such as fraud, theft, abuse, bribery, harassment and several other violations in the workplace. It aims to cultivate a positive work environment.

2. Why do we need EthicsPoint?

- Having an effective and confidential whistleblowing reporting system strengthens a company's ability to create a positive work environment and foster a culture of integrity and ethical decision-making.
- We believe that employees are the most important asset. By creating open channels of communication, we can promote a positive work environment and maximise productivity.
- Publicly traded companies are legally required to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the Audit Committee.
- A company, particularly if it is a financial services organisation, relies on the effective operation of a range of 'integrity systems' for keeping the institution and its management honest and accountable. Whistleblowing is a key component of a company's governance structure and cultural programme. The Corporate Governance Directives detail the minimum standards for compliance for whistleblowing and having a channel of reporting is a pre-requisite.

3. Isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and enables us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions and communicate any concerns. Effective communication is critical in today's workplace and this is a great tool to enhance that communication. EthicsPoint serves as a best in class reporting tool to meet compliance obligations, while maintaining a positive reporting environment.

Reporting – General

4. Why should I report what I know? What's in it for me?

We all have the right to work and do business in a positive environment. With that right comes the responsibility to act in an ethical manner and let the appropriate people know if someone is not acting appropriately. By working together, we can maintain a

healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

5. Does management really want me to report?

Yes. In fact, all the company's stakeholders (including employees, customers, suppliers, directors, shareholders etc.) need you to report. You know what is going on in the company - both good and bad. You may have initial knowledge of an activity that may be a cause for concern. Your reporting can minimise the potential negative impact on the company and its people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

6. What sort of situations should be reported?

Whistleblowing is when someone raises a concern about a misconduct or illegal activity, wrongdoing or violation of a company's values, Code of Conduct or regulations within the company that threatens its integrity or may cause financial or non-financial damage. Examples of situations to report include: a criminal offence (e.g. fraud, theft, bribery etc.), accounting irregularities, misconduct or covering up wrongdoing, on the job drug or alcohol abuse, unsafe working conditions, sexual harassment, racial or homophobic discrimination/behaviour, violence or threatening behaviour, violation of laws/ policies/procedures. Ecobank also has a defined procedure in place to stamp out harassment and bullying.

7. If I see a violation, shouldn't I just report it to my direct contact person (i.e. line manager, relationship manager) and let them deal with it?

If you observe some behaviour that you reasonably believe violates a company's values, code of conduct or regulations, you are expected to report it. Ideally, you should bring any concerns forward to your direct line manager or another member of the senior management team. We recognise, however, that there may be circumstances when you are not comfortable reporting the issue in this way. It is for this reason that Ecobank has implemented an independent third party hotline, EthicsPoint. It is better that you report anonymously rather than keep the information to yourself.

8. How can I make a complaint on EthicsPoint?

If you prefer to use an independent platform where you can submit your complaint anonymously, EthicsPoint provides a secure, confidential and anonymous method of whistleblowing, through the web option or a toll-free telephone option which are available 24 hours a day, 365 days a year. To report via the web option, visit www.reports.ethicspoint.com

All details for the toll-free telephone option can be found on the EthicsPoint website once a specific country is selected as the whistleblower's location.

9. What will happen once I have filed my complaint on EthicsPoint? Who can access it?

Reports are entered directly on to the EthicsPoint secure server to prevent any possible security breach. EthicsPoint only makes the reports available to specific individuals within the company, via an online case management system:

- These designated individuals are charged with evaluating the reports, initiating and following up on independent investigations and implementing resulting recommendations to address the concern(s) reported.
- Each of the report recipients has had training in treating the reports with the utmost confidentiality.
- Persons who may be implicated or named in a report will not be able to access the generated report in the online case management system. The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

Reporting Security & Confidentiality

10. Will EthicsPoint retain my computer's IP address and could this identify me as a report originator?

No, EthicsPoint does not generate or maintain any internet connection logs with IP addresses, so there will be no information linking your computer or device to EthicsPoint.

In fact, EthicsPoint is contractually committed not to pursue a whistleblower's identity. If you feel uncomfortable making a report from your work PC, you can use a PC outside your work environment (such as one located at an internet café or at a friend's house etc.) or any device with internet access, such as a tablet or your smartphone. Many people choose this option - in fact EthicsPoint's data shows that fewer than 12% of reports are made during business hours.

11. Can I file a report from home and still remain anonymous?

A report from home, a neighbour's computer or any internet portal will remain secure and anonymous. An internet portal never identifies a visitor by screen name and the EthicsPoint system strips away internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a whistleblower's identity.

12. I am concerned that information that I provide to EthicsPoint will ultimately reveal my identity. How can you assure me that this will not happen?

The EthicsPoint system is designed to protect your anonymity and is run by an independent third party. EthicsPoint is contractually committed not to pursue a whistleblower's identity. You as the reporter have the option to disclose your identity or to remain anonymous. Should you wish to remain anonymous, please ensure that you opt for this during the reporting process. If you wish to be anonymous, please also

ensure that the text of your report does not inadvertently reveal your identity (e.g. “From my cube next to John Smith...” or “In my 33 years...”).

13. Is the toll-free telephone hotline confidential and anonymous too?

Yes. If you call the EthicsPoint hotline, you will be asked to provide the same information that you would provide in an internet-based report and details will be entered into the EthicsPoint secure server. Reports made by telephone have the same security and confidentiality measures applied to them during delivery as internet-based submissions.

14. What if I want to be identified with my report?

There is a section in the report for you to identify yourself, should you choose to do so.

Tips & Best Practice

15. I am aware of some individuals involved in unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company chooses to promote ethical behaviour. All unethical conduct, at any level, ultimately hurts a company, all employees and other stakeholders, including you. You only have to consider what has happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company and the wider environment. So, if you know of any incident of misconduct or ethical violation, consider it a duty to yourself to report it for the good of the company, its employees, stakeholders and the wider community in which it operates.

16. I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. EthicsPoint can help you to prepare and file your report so that it can be properly understood. We'd rather that you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked because you weren't sure.

17. What if my boss or other managers are involved in a violation - could they get the report and start a cover-up?

No, not all managers have access to reports. Access to reports is via an online case management system which is only accessible to designated individuals who are charged with the responsibility of administering the whistleblowing framework. Additionally, the EthicsPoint system and report distribution are specially designed so that implicated parties are not notified or granted access to reports in which they have been named.

18. Can I provide further information or respond to queries about my report after filing it?

Yes, when you file a report via EthicsPoint, you will receive a unique reference number (Report Key) and will be requested to create a password. Using your unique reference number and password, you can return to the EthicsPoint system to access the original report again at any time, via the internet or telephone, to add more details. We strongly suggest that you regularly return to the EthicsPoint platform either by web or toll-free telephone in case you need to respond to any questions posted to you that may be needed to help in the investigation.

You and the company can enter into this 'dialogue' whether you disclosed your identity or remained anonymous when you filed your original report. This is possible because you can access your original report using your unique reference and password.

19. Are follow-ups on a report as secure as the first one?

Yes, all EthicsPoint correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of anonymity, unless the Whistleblower has selected to disclose their identity.

20. Can I file a report if I do not have access to the internet?

Yes. If you don't have access to the internet, or are uncomfortable using it, you can call the EthicsPoint hotline which is a toll-free hotline and is available 24 hours a day, 365 days a year. To find your local number you will first have to visit www.reports.ethicspoint.com and enter your location. You can visit the site via any computer or device that can access the internet. The EthicsPoint toll-free telephone details are also listed in the Ecobank Group Whistleblowing Procedure manual available on the EthicsPoint website, Ecobank website and SharePoint.