

# Ecobank Group Whistleblowing Procedures

November 2020

**Document Control**

Owner	Ecobank Transnational Incorporated (ETI)
Custodian	Group Head of Compliance
Version	1.00
Created	October 2020
Approving Body	The Group Executive Committee (GEC)

**Document Revision History**

Version No.	Revised by	Title/ Designation	Date	Modification details
Version 1.00	Effie GRAY	Senior Group AML/CFT & Compliance Officer	30 Oct 2020	Initial procedure document

## Contents

1. Purpose .....	4
2. Raising integrity or ethical concerns (whistleblowing).....	4
3. Guidance .....	5
4. Channels for Whistleblowing .....	5
I. External channels: .....	5
i. EthicsPoint web option.....	6
ii. EthicsPoint toll-free telephony option.....	6
II. Internal channels: .....	7
i. Line manager or Direct contact person.....	7
ii. Senior management.....	8
iii. Ecobank Ethics .....	8
iv. Group Chief Executive Officer .....	8
III. Managing whistleblowing reports made via internal channels .....	8
5. References .....	9
Appendix 1 – Reporting via EthicsPoint web option.....	10
Appendix 2 – Reporting to EthicsPoint by toll-free telephone .....	15
i. Dialling instructions.....	15
ii. Telephone details .....	17

## 1. Purpose

This procedure document is drawn in line with the Ecobank Group Whistleblowing Policy.

It is intended to guide Ecobank employees and other stakeholders (non-employees) on the channels and procedure to report actual or reasonably suspected corporate misconduct such as Market abuse, insider trading, theft, fraud, breach of confidentiality, corruption, bribery, harassment, bullying, retaliation, unethical conduct, violations of local laws and regulations or the Ecobank Code of Conduct, etc.

## 2. Raising integrity or ethical concerns (whistleblowing)

Part of building a culture of trust is learning to speak up when something is not right, so that the organisation can address the problem.

The success of Ecobank in effectively managing corporate misconduct depends on you confidentially reporting if something is not right, so that it can get addressed. We understand that it's not easy to speak up and you might be uncomfortable or anxious, that is why we do not tolerate retaliation. You will not suffer adverse consequences for:

- Raising a concern in good faith about suspected or actual misconduct.
- Cooperating with an investigation

Ecobank recognizes that the decision to report a concern can be a difficult one to make and thus commits to remain supportive of all Whistleblowers. Ecobank prohibits any harassment or victimization (including informal pressures) of whistleblowers and will take appropriate action to protect them when they raise a concern in good faith

Any employee who retaliates against a whistleblower acting in accordance with the Whistleblowing policy will be dealt with in line with the Human Resources Policy and/or disciplinary procedures, up to and including termination. Appropriate measures shall be taken against anyone who (attempts to) victimize a stakeholder who has Whistleblown a misconduct in good faith. Appropriate measures include disciplinary action, civil action or criminal prosecution

No retaliatory action shall be taken against the Whistleblower who, in good faith, makes an allegation, which is not later confirmed by subsequent investigations.

All cases reported will be treated with outmost confidentiality and treated fairly. A Whistleblower is also required to maintain strict confidentiality regarding any report they have submitted.

Staff members who make a report in bad faith, particularly if it is based knowingly on false or misleading information, shall not be protected. Where it is determined that the allegations were a deliberate falsehood aimed at settling a score, tarnish reputation or gain undue attention, such action will be treated extremely seriously by Ecobank Management and the appropriate sanctions or actions will be taken against the Whistleblower (reporting in bad faith) in line with the Human Resources Policy and/or disciplinary procedures.

### 3. Guidance

Ecobank has made available for access to all employees and non-employees several information on Whistleblowing such as the Ecobank Group Whistleblowing policy and Procedures, the Ecobank Group Code of Conduct and FAQs. These are accessible through the following platforms:

- Ecobank Website  
[www.ecobank.com](http://www.ecobank.com)
- EthicsPoint Website  
[www.reports.ethicspoint.com](http://www.reports.ethicspoint.com)
- Winning as One microsite (Sharepoint)  
<https://ecobank.sharepoint.com/winningasone/SitePages/CCE.aspx>

A person who may be unsure whether or not to whistleblow or raise an ethical concern, seek advice on the nature of the disclosure or concerns on protection shall be free to seek the advice and assistance of the Head of Compliance.

### 4. Channels for Whistleblowing

The Ecobank whistleblowing channels are open to all employees as well as non-employees.

If an employee or any other stakeholder has a concern that there is actual or they reasonably suspect misconduct within Ecobank (referring to the Ecobank Group and its subsidiaries, herein referred to as "Ecobank"), they should escalate their ethical concerns (blow the whistle) directly using any of the following channels and options listed under this section. Whichever option is used, your report will be treated with utmost confidentiality

A whistleblower can either disclose his/her identity or opt to remain anonymous. Reports made anonymously should provide enough information to allow an effective investigation. This is because it may pose a challenge to contact the Whistleblower in case additional information is required.

#### I. External channels:

The External Channels are the designated Whistleblowing channels. The reason is that these allow for the Whistleblower to disclose their identity or remain anonymous.

Ecobank Group has implemented "EthicsPoint" which is an automated Whistleblowing hotline managed by an independent ethics system provider named **NAVEX Global**<sup>1</sup>.

---

<sup>1</sup> For more information on NAVEX Global, visit [www.navexglobal.com](http://www.navexglobal.com)

NAVEX Global has developed a dedicated hotline for Ecobank, entirely independent from the Ecobank IT environment (eProcess) which is accessible in total confidentiality by all Ecobank employees, directors, suppliers, contractors, consultants, customers, other stakeholders and the public at large. The independence of the platform provides comfort and confidence to a Whistleblower to report their concerns freely as the process is managed out of the Ecobank IT environment. EthicsPoint allows for a whistleblower to disclose their identity or remain anonymous.

The dedicated hotline is secured by NAVEX with no possibility for an external party to access the information reported by the Whistleblower.

Two (2) options are available to report using external channels:

**i. EthicsPoint web option.**

Submit a report using the independent whistleblowing platform called “EthicsPoint”. EthicsPoint is user friendly, prompting the Whistleblower as they make their report and is available in four (4) language options; English, French, Spanish and Portuguese. EthicsPoint is accessible across the Ecobank Group and Globally to anyone using a computer, tablet, smartphone or any device with internet access via: [www.reports.ethicspoint.com](http://www.reports.ethicspoint.com).

*(Refer to Appendix 1, Reporting via EthicsPoint for the step by step process)*

**ii. EthicsPoint toll-free telephony option.**

In countries where such option is available, submit a report by toll free telephone to the independent whistleblowing hotline, EthicsPoint. The country specific toll-free telephone details are listed on the EthicsPoint website once a country is selected as the Whistleblower’s location. The telephone details are also listed in *Appendix 2 of the Ecobank Whistleblowing procedures* accessible through the Ecobank Website, EthicsPoint Website and Winning as One microsite (Sharepoint) (see [section 3 – Guidance](#), above). The telephone details may be updated from time to time.

*(Refer to Appendix 2 for country specific toll-free telephone details and dialling instructions)*

It should be noted that EthicsPoint is not an Emergency Service. Whistleblowers are discouraged from using this portal to report events presenting an immediate threat to life or property i.e. fire or flood.

### **EthicsPoint case management**

- a) EthicsPoint generates a report based on the information disclosed by the Whistleblower.
- b) Reports generated are made available to Ecobank Group Compliance via a secure online case management system provided by Navex Global.
- c) Persons at Ecobank Group Compliance who may be implicated or named in a report will automatically 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.
- d) In the event a Whistleblower opted to remain anonymous, EthicsPoint is contractually committed not to pursue a whistleblower's identity. Reports are made directly on to the EthicsPoint secure server which are independent from Ecobank, to prevent any possible breach in security.
- e) Ecobank Group Head Compliance or their designate, after analysing the report ensure that the report is communicated to Internal Audit & Management Services (Group or subsidiary, depending on the case) to initiate an investigation.
- f) All findings of Whistleblowing cases are reported to the Ecobank Group Head Compliance or their designate, except where the case implicates them. Refer to the Whistleblowing Policy for more details on Levels of Escalation.

*For more information on EthicsPoint, please read the FAQs (Refer to section 3 – Guidance)*

## **II. Internal channels:**

The Internal Channels are alternative Whistleblowing channels. Whilst confidentiality is upheld, internal channels do not guarantee anonymity of the whistleblower.

Four (4) options are available to report using internal channels:

### **i. Line manager or Direct contact person**

Inform your line manager in the case of an employee or direct contact person within Ecobank, i.e. relationship or account manager.

## ii. Senior management

Where a Whistleblower feels the need to report their concern directly to somebody within Ecobank but is uncomfortable discussing their concern with their immediate contact person (i.e. relationship or account Manager for the customer or supervisor, in the case of an employee) or foresees potential conflicts of interest or any other reason whatsoever, he/she may at his/her discretion address the matter to a higher-level official within Ecobank at Subsidiary or Group Level, i.e. the Head Compliance, General Counsel, Chief Risk Officer or the Chief Executive Officer/ Managing Director or any other Senior Manager.

## iii. Ecobank Ethics

Channel your communication on ethical matters including Whistleblowing directly to the Ecobank Group Compliance Department via mailing address: [ETHICS@ecobank.com](mailto:ETHICS@ecobank.com)

This mailing address is the main email hub for all information and updates on ethics and compliance within Ecobank. It is used to communicate items around ethics and compliance including whistleblowing which is a key tenant of Ecobank's governance structures and cultural programmes. To ensure confidentiality is upheld, this address is managed by designated staff at the Ecobank Group Compliance Department.

## iv. Group Chief Executive Officer

Channel your communication on ethical matters including Whistleblowing directly to the office of the Ecobank Group Chief Executive Officer via mailing address: [gceooffice@ecobank.com](mailto:gceooffice@ecobank.com)

## III. Managing whistleblowing reports made via internal channels

- i. On receipt of the allegation from the Whistleblower, the recipient of the report will immediately bring this to the attention of the Head Compliance at Subsidiary level or Group level.
- ii. The Head Compliance shall acknowledge receipt of the allegation and where appropriate to the nature of information or allegations, explain the subsequent actions to be taken.
- iii. The Head Compliance shall register the allegation in EthicsPoint ([www.reports.ethicspoint.com](http://www.reports.ethicspoint.com)) to ensure this is tracked for resolution.



- iv. The Head Compliance shall engage Internal Audit & Management Services to investigate the report in accordance with the Ecobank Group Whistleblowing Policy (*Refer to the section on Levels of Escalation*).

**Please engage the Head Compliance for any information or clarity on the Whistleblowing Policy or procedures.**


## **5. References**

- i. The Ecobank Group Code of conduct
- ii. The Ecobank Group Whistleblowing Policy
- iii. The Ecobank Group Anti - Retaliation Program
- iv. Ecobank Policy on Harassment and Bullying
- v. ETI Human Resources Policies and Procedures


## Appendix 1 – Reporting via EthicsPoint web option

1. Connect to a computer/ device with internet access<sup>2</sup> and open the EthicsPoint whistleblowing portal: [www.reports.ethicspoint.com](http://www.reports.ethicspoint.com)
2. Select the country of location of the whistleblower, the country (Ecobank subsidiary/ affiliate) where the misconduct occurred and also the location (Head Office, or branch) where the misconduct took place. It is compulsory to select the locations to better orientate any investigations.






3. Click on 

4. Select among a universe of possible misconduct, violations/ malpractices and click on the correspondent amber arrow (  ).

<sup>2</sup> Whistleblower can connect from any location using their computer, tablet, smartphone or any device with internet access. In all cases confidentiality is guaranteed

You are currently in the confidential and secure reporting structure of EthicsPoint. Below are the choices available to you. Please click on the arrow (  ) to select the type of report you would like to make.

**Ecobank**

 <b>Abuse of Authority (inappropriate supervisory directions)</b>	Any inappropriate actions or directions from a person of authority.
 <b>Account and Investment Reviews</b>	Concerns regarding account and investment reviews, required by regulation, of client/fund accounts.
 <b>Accounting Irregularities and other Accounting, Internal Accounting Controls or Auditing Matters</b>	Any potential accounting/control/auditing irregularity that may be a violation of law such as Sarbanes-Oxley, or other similar law and/or regulation, in any jurisdiction.
 <b>Alcohol/Drug/Substance Abuse in Workplace</b>	Substance abuse which affects an employee's ability to carry out their job duties.
 <b>Bribery or Kickbacks (nongovernmental)</b>	The payment or provision of any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided directly or indirectly, and that has as one of its purposes the improper obtaining or rewarding of favorable treatment in a business relationship.

5. Fill the below screen.
  - 5.1 Agree to the terms and conditions
  - 5.2 Confirm if the whistleblower is an Ecobank employee or not (see below in red).
  - 5.3 Decide if the whistleblower would like to disclose their identity or remain anonymous. Select "Yes" to remain anonymous (see below in red).

**ethics.point** You are now in an EthicsPoint Secure Area | [File a Report](#)

**ETHICSPPOINT IS NOT AN EMERGENCY SERVICE.**  
 Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

\* Yes - I agree to the [Terms and Conditions](#) of making this report.

**Please provide information as follows:**  
 (\* Required fields )

Organization/Tier: **Ecobank**

Location where incident occurred:

Physical address, branch and/or store number

City:  State/Province:

Zip/Postal Code:

Country:

---

**\* Are you an employee of Ecobank?**

Yes  No

---

**\* Do you wish to remain ANONYMOUS for this report?**

Yes  No

- 5.4 In case the whistleblower decides to disclose their name, click on “No” and fill the information requested as displayed on the below image. Whistleblower is requested to provide their contact details to allow engagement where needed to aid investigation.

**\* Do you wish to remain ANONYMOUS for this report?**

Yes  No

**If you want Ecobank to know your identity, please complete the following:**

Your Name:    
First Name Last Name

Your Phone Number:

Your E-mail Address:

Best time for communication with you:

6. Describe the details of the misconduct by completing the fields presented on screen:

**Report - Abuse of Authority (inappropriate supervisory directions)**

**\* Please identify the person(s) engaged in this behavior:**

Example:  
 John Doe, Director of Internal Audit  
 Unknown, Unknown, Night Supervisor

	First Name	Last Name	Title
#1	<input type="text"/>	<input type="text"/>	<input type="text"/>
#2	<input type="text"/>	<input type="text"/>	<input type="text"/>
#3	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Do you suspect or know that a supervisor or management is involved?**

Yes  No  Do Not Know / Do Not Wish To Disclose

If yes, then who?

Example:  
 John Doe,  
 Director of  
 Internal Audit

Any persons mentioned here will be restricted by EthicsPoint from access to this reported information.

**Is management aware of this problem?**

Yes  No  Do Not Know / Do Not Wish To Disclose

**What is the general nature of this matter?**

This should be a general description only, you will be asked for specifics later.

Where did this incident or violation occur?

We recognize that this incident may not have occurred in a particular location. However, if this incident was observed in some documentation or business transactions, please indicate this accordingly.

Please provide the specific or approximate time this incident occurred:

Examples:  
Tuesday, May 3, 2002  
Two weeks ago  
Approximately a month ago

\* How long do you think this problem has been going on?  
- Select One -

\* How did you become aware of this violation?  
- Select One -  
If other, how?

Please identify any persons who have attempted to conceal this problem and the steps they took to conceal it:

Examples:  
Ignored it  
Changed documents  
Said it was not a problem  
Said they would look into it

Please identify by name and title.

If you have a document or file that supports your report, most common file types can be uploaded:  
[Click here to upload files](#)

Load evidence if available.

select

\* Please provide all details regarding the alleged violation, including the locations of witnesses and any other information that could be valuable in the evaluation and ultimate resolution of this situation.

Please take your time and provide as much detail as possible, but exercise care to not provide details that may reveal your identity unless you wish to do so. It may be important to know if you are the only person aware of this situation.

When you submit the report, you will be issued a Report Key. Please write it down and keep it in a safe place. We ask you to use this Report Key along with the password of your choosing to return to EthicsPoint through the website or telephone hotline in 5-6 business days. By returning in 5-6 business days, you will have the opportunity to review any Follow-up Questions or submit more information about this incident.

Please choose a password for this report:

\* Password:

\* Re-enter Password:

Your passwords must match and be at least four characters long.

Whistleblower to create his own password.

Submit Report

Select to submit

7. The whistleblower will be requested to create a password of their choice.

8. Once the whistleblower clicks on  the information is automatically transferred to NAVEX Global team in charge of creating a report.
9. The system provides a unique report key (reference) to the whistleblower.



10. The whistleblower can use their Report Key and the password earlier created to reconnect on the platform to amend their report, provide additional information, check for any feedback on their report and communicate or chat online with the designated team at Ecobank Group Compliance in charge of case management.

## Appendix 2 – Reporting to EthicsPoint by toll-free telephone

### **i. Dialling instructions**

Telephone calls to the NAVEX Global Hotline “EthicsPoint”, will need to be made using a telephone line with access to international dialling. This is because the hotline is centrally managed by NAVEX Global.

To submit a report by toll-free telephone to EthicsPoint, please follow the below instructions:

1. Find a telephone line with access to international dialling
2. Look up your country specific telephone details and dialling instructions listed on the EthicsPoint website [www.reports.ethicspoint.com](http://www.reports.ethicspoint.com) once a country is selected as the Whistleblower’s location (screen shot below) or refer to the dialling instructions recast in *point (3)* below and the telephone details listed in *point (ii)* below.
3. Place your call following the dialling instructions depending on the call type applicable to your location. The specific call type applicable to your location can be either one of the below:
  - a) Reverse Charge Calls / Collect Calls**
    - From an outside line contact your local operator.
    - Request a reverse charge or collect call to be placed to the United States, to the telephone number for your country of location.
    - All reverse charge or collect calls will be accepted by the Contact Center using an automated English message.
  - b) Direct Access**
    - From an outside line dial the direct access code for your location
    - At the English prompt dial the telephone number for your country of location.
  - c) OneConnect**
    - From an outside line dial the OneConnect number for your country of location.

Follow the below steps to look up your location's telephone details and dialling instructions from the EthicsPoint website:

The screenshot shows the 'To Make a Report' section of the EthicsPoint website. It includes the following elements:

- Go to:** [www.reports.ethicspoint.com](http://www.reports.ethicspoint.com)
- Select your location:** A dropdown menu with 'Ghana' selected. This area is circled in red.
- Online:** A dropdown menu with '- Select -' selected.
- By Phone:** A section titled 'Direct Access' with two steps:
  - From an outside line dial the direct access number for your location:  
**Ghana** ..... 0-2424-26-004
  - At the English prompt dial **(844) 249-7304**.

Red arrows point from the text 'Select your location' to the dropdown menu and from 'Follow dialling instructions' to the 'By Phone' section.

**NOTE:**

Your local telephone system in your country is typically managed and operated by your local telecom technicians. Sometimes telephone line owners intentionally program certain restrictions on these systems to prevent unnecessary long-distance calls and other types of abuse or attacks. These programming restrictions can sometimes prevent calls from being able to reach NAVEX's hotline system.



## ii. Telephone details

- Find your country of location from the below list
- Identify the dialling instructions applicable to your location
- Going by the call type applicable to your location follow guidance as per *point (i)(3)* above

	LOCATION	LANGUAGE	TELEPHONY HOTLINE		
			Call type (refer to dialling instructions)	Telephone number	Telephony Hotline provider
1	Bénin	French; English	Direct Access (Code: 102)	(844) 249-7304	NEVAX Global
2	Burkina Faso	French; English	Reverse Charge Calls / Collect Calls	(503) 495-2681	NEVAX Global
3	Burundi	French; English	Reverse Charge Calls / Collect Calls	(503) 444-4903	NEVAX Global
4	Cameroon	English; French	Reverse Charge Calls / Collect Calls	(503) 270-4716	NEVAX Global
5	Cape Verde	Portuguese; English	Reverse Charge Calls / Collect Calls	(503) 530-7082	NEVAX Global
6	Central African Republic	French; English	Reverse Charge Calls / Collect Calls	(503) 495-2681	NEVAX Global
7	Chad	Arabic; French; English	Reverse Charge Calls / Collect Calls	(503) 444-4900	NEVAX Global
8	China	Mandarin; Cantonese; English	OneConnect	400 120 4730	NEVAX Global
9	Côte D'Ivoire	French; English	Direct Access (Code: 00-111-11)	(844) 249-7304	NEVAX Global
10	Democratic Republic of The Congo (DRC)	to be advised	to be advised	to be advised	to be advised
11	Equatorial Guinea	Spanish; French; English	Reverse Charge Calls / Collect Calls	(503) 444-4901	NEVAX Global
12	Ethiopia	to be advised	to be advised	to be advised	to be advised
13	France	French; English	OneConnect	0 805 08 15 91	NEVAX Global
14	Gabon	French; English	Reverse Charge Calls / Collect Calls	(503) 444-4903	NEVAX Global
15	Gambia	English	Reverse Charge Calls / Collect Calls	(503) 530-7030	NEVAX Global
16	Ghana	English	Direct Access (Code: 0-2424-26-004)	(844) 249-7304	NEVAX Global

17	Guinée-Bissau	Portuguese; English	Reverse Charge Calls / Collect Calls	(503) 530-7082	NEVAX Global
18	Guinée Conakry	French; English	Reverse Charge Calls / Collect Calls	(503) 495-2681	NEVAX Global
19	Kenya	Swahili; English	OneConnect	0800 221 367	NEVAX Global
20	Liberia	to be advised	to be advised	to be advised	to be advised
21	Malawi	English	Reverse Charge Calls / Collect Calls	(770) 743-1825	NEVAX Global
22	Mali	French; Bambara; English	Reverse Charge Calls / Collect Calls	(503) 530-7039	NEVAX Global
23	Mozambique	Portuguese; English	Reverse Charge Calls / Collect Calls	(503) 530-7082	NEVAX Global
24	Niger	French; English	Reverse Charge Calls / Collect Calls	(503) 495-2681	NEVAX Global
25	Nigeria	English	OneConnect	708 060 1513	NEVAX Global
26	Republic Of Congo	French; English	Reverse Charge Calls / Collect Calls	(503) 495-2681	NEVAX Global
27	Rwanda	to be advised	to be advised	to be advised	to be advised
28	Sao Tome	Portuguese; English	Reverse Charge Calls / Collect Calls	(503) 530-7082	NEVAX Global
29	Senegal	French; English	Direct Access Code: To be advised	(844) 249-7304	NEVAX Global
30	Sierra Leone	to be advised	to be advised	to be advised	to be advised
31	South Africa	Afrikaans; English	OneConnect	080 099 2125	NEVAX Global
32	South Sudan	English	Reverse Charge Calls / Collect Calls	(503) 530-7030	NEVAX Global
33	Tanzania	to be advised	to be advised	to be advised	to be advised
34	Togo	to be advised	to be advised	to be advised	to be advised
35	Uganda	English	OneConnect	0800 113311	NEVAX Global
36	United Arab Emirates (UAE)	Arabic; English	OneConnect	800 0320643	NEVAX Global
37	United Kingdom (UK)	English	OneConnect	0800 086 9917	NEVAX Global
38	Zambia	to be advised	to be advised	to be advised	to be advised
39	Zimbabwe	to be advised	to be advised	to be advised	to be advised