



## **Stanbic IBTC Whistle Blowing Policy Statement**

### **Introduction**

Stanbic IBTC Trustees Limited otherwise known as "SITL" or "The Company" is committed to establishing a culture of integrity, transparency, openness and compliance in accordance with the values and code of ethics adopted by the Company.

The whistle blowing policy provides for the protected disclosure of any attempted, suspected or actual and/or unlawful irregular or unethical behaviour that the whistleblower comes across in the Company in line with the guidelines for whistleblowing for Companies and Other Financial Institutions in Nigeria (May 2014) by providing a framework for employees and other stakeholders to report their concerns internally at the Company and externally.

### **Scope**

Whistleblowing is intended for employees, Management, Directors of the Company and other Stakeholders. This policy also applies to whistleblowing disclosures made by non-employees or external parties to the company.

### **Protection**

The Company will protect a whistleblower who makes a whistleblowing report from being victimized or suffering prejudice for making the report, provided that;

The whistleblower makes the report in good faith.

It is reasonable for the whistle blower to make the report

The report is made on the reasonable belief that it is true

The report is not made for personal gain except if any reward is payable in terms of any law;

The law is made in accordance with the policy.

### **Anonymity**

The Company allows for anonymous whistle blowing reporting of wrongdoings in the Company.

However, the following factors would be considered before investigating anonymous reports

The seriousness of the issues

The significance and credibility of the concern and;

The possibility of confirming the allegation

The Wealth House Plot 1678 Olakunle Bakare Close Off Sanusi Fafunwa Street P O Box 71707 Victoria Island Lagos Nigeria  
Tel: +234-1-2801266, Fax +234-1-2716021/2 Registered Office: I.B.T.C. Place Walter Carrington Crescent, Victoria Island, Lagos

Stanbic IBTC Trustees Limited. RC846900

Directors: Demola Sogunle (Chairman) Charles Omoera (Chief Executive) Emi Agaba-Oloja (Executive) Abimbola Afolabi-Ajayi Oluwatosin Leye-Odeyemi Chidi Okezie Olumide Oyetan

Note that the Company cannot protect the identity of a whistle blower who remains anonymous

The Company is not obliged to protect a whistle blower against prejudice in the workplace, who in bad faith maliciously make a false report. Or who unfairly or unjustly dishonors another. Appropriate disciplinary action will be taken in these cases;

### **Investigation**

The Company ensures that all whistleblowing reports made in terms of this policy are reviewed and investigated where appropriate.

### **Reporting Channels**

Whistle blowing reports can be made internally to the Company, through any of the following whistle blowing channels;

234 (1) 4227777 or 234 (1) 271 7739

[whistleblowingline@kpmg.co.za](mailto:whistleblowingline@kpmg.co.za)

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