

Abridged Anti-Bribery and Corruption Policy

1. Objectives and Purpose

- ❖ The Anti-Bribery and Gifts policy is intended to set out the Bank's commitment to preventing all forms of Bribery and corruption in its business dealings
- ❖ This policy sets out the bank's zero-tolerance for non-compliance with the bribery and corruption Policy.
- ❖ This policy applies to all board members, employees and any other bank's officers such as internees.
- ❖ A breach of this policy may therefore result in a termination of the contract between the bank and employee or board member

2. Personal Responsibility

- Every board member, employee or any other bank's officer such as internee has a personal responsibility to know and follow this Policy.
- All board members and employees are responsible for the prevention, raising of any concerns and/or reporting any known or suspected forms of bribery and corruption

3. Prohibition

Board members, employees and any other bank's officers such as internees are strictly prohibited to engage in any form of Bribery or Corruption, whether directly, or indirectly or through a third party or family related party. In this regard, board members, employees and any other bank's officers such as internees are prohibited to give or accept bribes of any nature.

It is absolutely forbidden for any board member, employee, any other bank's officer such as internee or any other person associated with an employee or board member-whether as a friend or family member acting on behalf of the employee or a board member- to participate in or commit any actions or behaviours that constitute bribery and/or corruption that may manifest in one or many of the following form:

- 1) Bribery:** This involves offering or accepting bribes in exchange for approving or disbursing loans, ignoring regulations, or providing confidential information **or** to influence decisions or gain preferential treatment.

- 2) **Kickbacks:** This involves receiving payments or benefits in exchange for steering business or contracts to specific parties, often at inflated prices or terms disadvantageous to the bank.
- 3) **Conflict of Interest:** Bank officials might exploit their positions for personal benefit by engaging in transactions or activities that conflict with their duties to the bank or its customers.
- 4) **Nepotism and Cronyism:** Favouritism based on personal relationships rather than merit that may lead to the appointment or promotion of individuals who are not qualified for their roles.
- 5) **Fraudulent lending practices:** this involves approving loans based on false information or inadequate due diligence, often to benefit certain individuals or entities at the expense of the bank.
- 6) **Abuse of Power:** Bank officials in positions of authority may abuse their power to intimidate or coerce employees, clients, or counterparties for personal gain or to cover up wrongdoing.
- 7) Any other type of action that may qualify to be partially or totally bribes/corruption by the laws, regulation and policies of the bank;

4. Gifts, Hospitality and Other Benefits

As a general rule, Board members and Employees shall not accept Gifts or other benefits or advantages except as set out in any relevant statutes and policies. In this regard, a Board member or Employee shall not in relation to the Bank, accept Gifts or inducements, including hospitality that may place him/her under an obligation.

5. Political Contributions

Board members or Employees shall not make any donations in cash or in kind in support of any political party or candidate for political office, while acting for and on behalf of the Bank.

6. Charitable Contributions

The Bank recognizes the importance of Corporate Social Responsibility and gives emphasis to Environmental, Social and Governance (ESG) aspects of the business to underpin sustainability.

In this regard, the Bank accepts and encourages the act of donating to charities through various forms including through services, knowledge, time, or direct financial contributions. Board members and Employees may make contributions in line with the Bank's Corporate Social Responsibility Policy and ensure that such contributions are not used to facilitate and conceal acts of Bribery.

7. Reporting Contraventions

In case a Board member, Employee or Third Party suspects that there is an instance of bribery or corrupt activities occurring in relation to the Bank, they are encouraged to raise their concerns at as early a stage as possible.

Various channels are available for Board member, member of staff, customers, or member of the general public to raise concerns if they suspect a Bribery or Corruption involving a bank employee, associate, or third party conducting business on behalf of the bank. Such incidents must promptly be reported in accordance with the Bank's Whistleblowing Policy and this Anti-Bribery and Anti-Corruption Policy through the following channels:

- **Investigation Manager:**
 - Phone number: +250 793165029
 - Email: Abel.Bitok@ncbagroup.com
- **Whistleblowing channels:**
 - Phone: +250 788 149 567
 - Email: ncbabank@tip-offs.com
 - Toll-Free Fax: 00800007788

The Bank will offer all possible support to anyone who, in good faith, raises a concern pursuant to this policy, and in line with the Bank's Whistle Blowing policy will ensure that no one suffers reprisal or unfair treatment for raising concerns relating to Bribery and corruption in good faith.