

Sterling Bank Anti-Bribery & Corruption Policy Statement

Sterling Bank is committed to conducting its business in accordance with the highest ethical standards and in full compliance with all applicable anti-bribery and corruption regulations and laws. We operate a zero-tolerance approach to bribery and corruption in all forms. Any form of bribery, whether direct or indirect, is strictly prohibited.

All employees, contractors, and third-party representatives acting on behalf of Sterling are required to adhere to this policy, and any violation will result in disciplinary action, up to and including termination of employment or third-party contract and prohibition from future business dealings. We encourage reporting of any suspected instances of bribery or corruption, and we will take reasonable steps to ensure that all reports will be investigated promptly and fairly.

Guiding Principles

The management and employees, across all cadres, are entrusted with the responsibility of preventing, detecting, and reporting acts of bribery and corruption. The Bank's management, employees and any other third party engaged are prohibited from making or receiving payments, directly or indirectly, to influence an official act or decision, or for any other improper purpose to obtain or retain business, as well as:

- a) giving or receiving of gifts, meals, and entertainment not proportionate and reasonable for the circumstances, with a view to improperly induce a third party to misuse their position or as a quid pro quo for official action.
- b) making, promising, offering, or authorizing a payment or a gift of anything of value to any customer, vendor, government official, political party, party official, political candidate, and others to influence such recipients to use their positions to help Sterling Bank obtain or retain business, direct business to anyone, or to secure any other improper advantage.
- c) making, promising, offering, or authorizing any payment or gift to an agent, business partner, or any other third party with the knowledge that or reason to know that a customer, vendor, government official, political party, party official, or political candidate will ultimately receive any portion of the payment due to improper action.
- d) making facilitation payments to low-level government employees or officials to facilitate/expedite routine governmental actions or services that involve the exercise of personal judgment or discretion.
- e) Providing or accepting kickbacks, which are payments made in return for facilitating a transaction or providing preferential treatment.
- f) Engaging in any activity that seeks to circumvent the Bank's internal controls regarding facilitation payments, kickbacks, or any form of bribery, including falsifying records or misrepresenting the nature of a transaction.

However, it is important to state that the ABC Policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties under the guidance of acceptable gifts as stipulated in the Gift and Honorarium Policy of the Bank or payments made under duress.



In summary, it is an offence:

- to suggest or give bribes to other persons or entities.
- to demand or collect bribe from other persons or entities.
- to fail to prevent and/or report acts of bribery and corruption.

Whistleblowing

The Bank provides directions for all stakeholders to disclose any unusual and excessive conduct which may be or suggest a breach of this Policy through the secured whistleblowing medium. All genuine concerns of any alleged or suspected bribery, corruption, criminal activities, or fundamental breach of this Policy can be reported through the Bank's official channel and as available on our website.

The referenced acts may also be reported through the Bank's Independent Consultant, see information below.

	Internal	External
Website	https://sterling.ng/support/whistle/	https://apps.ng.kpmg.com/ethics
Email:	whistleblowing@sterling.ng	kpmgethicsline@ng.kpmg.com
Mobile:	0803 764 9757; 0802 395 4834 0909 484 4420 (charges apply)	0800 123 5764; 0800 123 5276; (toll free)
App:		Please download the KPMG Whistleblowing Application from Google and Apple store

The Bank will take reasonable steps to protect those who report suspicions of bribery and corruption in good faith from retaliation, and all reports and concerns received through these channels will be anonymously and confidentially treated.

We kindly request that you formally attest to Sterling Bank's Anti-Bribery and Corruption (ABC) Policy by acknowledging your commitment to comply with its provisions as captured in the statement above.

Your formal attestation is essential to establishing/maintaining our partnership and ensuring full compliance with applicable laws and regulations.