

Standard Bank Group Code of Ethics Living our Values



Standard Bank

Serving our customers

- Being fair to customers
- Providing excellent products, services and solutions
- Keeping customers informed
- Determining customer needs responsibly
- Meeting customer expectation
- Keeping our processes easy and simple

Growing our people

- Providing opportunities for professional development
- Evaluating performance objectively
- Applying Standard Bank's values and principles consistently

Delivering to our shareholders

- Creating sustainable value
- Adhering to good corporate governance practices
- Protecting intellectual property
- Protecting Standard Bank's name and reputation
- Avoiding anti-competitive behaviour
- Engaging in political activities responsibly

Being proactive

- Anticipating and embracing change
- Encouraging and rewarding innovation responsibly
- Maintaining and sharing accurate and useful information

Working in teams

- Being individually accountable for our actions
- Preventing favouritism
- Extracting value from different perspectives
- Working in unity
- Acknowledging both individual and team contributions

Respecting each other

- Recognising human dignity
- Valuing Standard Bank and that for which it stands
- Providing a work environment free of harassment and intimidation
- Complying with occupational health and safety regulations
- Protecting Standard Bank's physical assets

Upholding the highest levels of integrity

- Being honest
- Avoiding both actual and perceived conflicts of interest
- Accepting gifts and entertainment responsibly
- Giving gifts and entertainment responsibly
- Avoiding illegitimate commission payments
- Combating and reporting unethical and criminal activities

Constantly raising the bar

- Having the confidence to achieve ambitious goals
- Meeting the legitimate expectations of our stakeholders
- Expressing personal identity with dignity and tolerance

Quick reference guide

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1. Our Code of Ethics in context

A short message from the Chief Executive Officers and Group Ethics Officer

The Standard Bank is committed to being the leading financial services organisation in, for and across Africa, delivering exceptional client experiences and superior value. This commitment implies tirelessly growing and improving our business in the countries in which we already operate and expanding into others.

We are a large and diverse business, and in order to drive our growth cohesively, we have agreed on a number of common guidelines, such as our values. These imply a common decision-making framework. This framework is more clearly defined in the Code of Ethics.

Our Code of Ethics is designed to:

- Facilitate greater empowerment and faster decision-making at all levels of our business; and
- Ensure that as a significant player in the financial services industry, we adhere to the highest standards of responsible business practice in our interactions with all our stakeholders.

We urge you to read and understand the Code of Ethics and to become familiar with how it relates to you and your role in the group.

If you are personally faced with, or observe, situations that could run contrary to our ethics – our core values and ethical principles – you have an obligation to resolve or report these incidents, using the approaches described in the Code of Ethics.

We are personally committed to our Code of Ethics and appeal to each of you to make the same commitment.



Ben Kruger
Joint Group Chief Executive Officers



Sim Tshabalala



Neil Surgey
Group Ethics Officer

2. Purpose and use of our Code of Ethics

Why a Code of Ethics?

The Code of Ethics is necessary to provide clear parameters about acceptable principles within which Standard Bank employees are empowered to make decisions and act. The Code of Ethics acts as an important reference point for current and future policies and is in line with best practice in terms of governance and compliance.

What is in the Code of Ethics?

The Code of Ethics defines our values in greater detail and provides structure and guidance for value-based decision making. It is consistent with the laws of the countries in which Standard Bank operates.

Use of the Code of Ethics

The Code of Ethics should be used as an important reference point for employees when they are personally resolving any ethical issue that they may encounter. The Code of Ethics should be used to provide context and input for performance agreements and supporting mechanisms.

Note: that if you are unsure about what to do in any situation you have an obligation to seek guidance, through the processes described in the Code of Ethics.



3. Our values and ethical principles

Our values

Our values serve as beacons to guide our actions and decisions.

- Serving our customers
- Growing our people
- Delivering to our shareholders
- Being proactive
- Working in teams
- Respecting each other
- Upholding the highest levels of integrity
- Constantly raising the bar

Our ethical principles

Our ethical principles provide us with more detail about how our values apply in the workplace, including guidance on their application in specific situations.

4. Putting our values together

Taken together, our eight values guide us towards an overall message or philosophy in our dealings with our key stakeholders, being our customers, employees and shareholders.

The core of this overall philosophy is that we place customers at the centre of all that we do. We believe that shareholder wealth and the well-being of our employees are the result of effective customer service.

This philosophy is expressed more completely below, in terms of two points of focus, four ways of working, and a word of caution. Here they are:

Two points of focus

We believe that we need to focus on two priorities in order to become and remain a sustainable and relevant business and to deliver appropriate returns to our **shareholders**:

- We need to focus our energy and attention on providing our customers with the products, services and solutions that suit their needs.
- Our leaders need to encourage and help our people to develop to their full potential.

The foundation underlying these priorities is that everything that we do for our customers and our people is based on sound business principles.

Four ways of working

We have four guidelines for the way in which we work with one another:

- We **proactively** anticipate, in a carefully considered way, rather than react to situations for which we are unprepared.
- We believe that in **teams**, within and across business units, divisions and countries, we shall achieve much greater success than as individuals.
- Recognising the obligations corresponding with each of our rights, we act with the highest regard for the dignity of all people. We demonstrate **respect** for all people and for the values and principles of Standard Bank.
- It should be apparent to all our stakeholders that **integrity** permeates everything we do.

A word of caution

Our confidence in our abilities to achieve ambitious goals should never degenerate into complacency or **arrogance**.



5. Living our values

5.1 Serving our customers

We do everything in our power to ensure that we provide our customers with the products, services and solutions to suit their needs, provided that everything we do for them is based on sound business principles.

5.1.1 Principle: Being fair to customers

We should ensure that customers are central to our strategy and the way we do business. We should treat all customers fairly and apply policies appropriately to all customers, regardless of gender, race, religion, sexual orientation and the like. When dealing with customers we should conduct ourselves with the highest levels of integrity.

5.1.2 Principle: Providing excellent products, services and solutions

We should provide products, services and solutions that are designed to meet the needs of identified customer groups and ensure that the products, services and solutions are targeted accordingly. We should protect the confidentiality of all customer information. We should apply reasonable judgement in balancing safety, convenience and cost in the design, installation and maintenance of all banking and cash-handling facilities.

5.1.3 Principle: Keeping customers informed

We should give customers clear and appropriate information at all times.

5.1.4 Principle: Determining customer needs responsibly

We should give advice to customers based on their circumstances. We should not grant credit facilities without being aware of the customer's level of debt and their ability to repay it.

5.1.5 Principle: Meeting customer expectation

We should offer customers products, services and solutions that are of an acceptable standard and in line with what they have been led to expect.

5.1.6 Principle: Keeping our processes easy and simple

Customers should not face barriers when they want to change products, switch providers, submit a claim or complain. We should either resolve or report incidents of bad or inappropriate service as quickly as possible.



5.2 Growing our people

We encourage and help our people to develop to their full potential, and measure our leaders on how well they grow and challenge the people they lead.

5.2.1 Principle: Providing opportunities for professional development

Approach

We should recognise that development, for the joint benefit of the individual and Standard Bank, is a responsibility shared by team leaders and team members and that development goes hand-in-hand with contribution.

Working environment

We should recognise that development should occur in a context of manageable and sustainable workloads, in which customers' needs are not compromised.

Development mechanisms

We should facilitate the development of people through training, coaching and mentoring, and on-the-job or stretch assignments. In encouraging development, we should identify and provide recognition for people who help to develop others (either through direct mentoring and coaching, or through providing growth opportunities). Employees applying new knowledge should be guided with patience.

5.2.2 Principle: Evaluating performance objectively

We should participate constructively and objectively in performance evaluation processes. This should include clear communication of criteria, being consistent and giving and receiving feedback responsibly.

5.2.3 Principle: Applying Standard Bank's values and ethical principles consistently

We should apply Standard Bank's values and ethical principles consistently across countries, regions and employment levels.



5.3 Delivering to our shareholders

We understand that we earn the right to exist by providing appropriate long-term returns to our shareholders. We try extremely hard to meet our various targets and deliver on our commitments.

5.3.1 Principle: Creating sustainable value

We should operate Standard Bank profitably, while continually looking for ways to increase revenues and decrease costs. This includes using time and resources efficiently and building long-term, mutually beneficial relationships with customers.

5.3.2 Principle: Adhering to good corporate governance practices

We should adhere to applicable laws, regulations and industry guidelines in the various jurisdictions in which we operate, as well as internal policies and procedures.

5.3.3 Principle: Protecting intellectual property

We should treat Standard Bank's intellectual property as a valuable business asset, and disclose information on Standard Bank's intellectual property to relevant parties on a need-to-know basis only. Under no circumstances should confidential or sensitive information be shared with unauthorised persons or competitors.

5.3.4 Principle: Protecting Standard Bank's name and reputation

When representing Standard Bank, we should be seen to live all Standard Bank values and positively position Standard Bank and every thing for which it stands in dealing with internal and external parties.

5.3.5 Principle: Avoiding anti-competitive behaviour

We should not participate in cartels typified by activities involving collusive approaches to price fixing, tendering, division of markets, establishment of discounts and rebates, or joint boycotts of suppliers or customers. We should not abuse positions of market dominance.

5.3.6 Principle: Engaging in political activities responsibly

Organisationally

Designated Standard Bank representatives should engage, in a transparent and fair manner, with appropriate politicians and political parties, with a view to making a positive difference to the relevant country's well being and Standard Bank's business environment. Requests for funding of, or decisions to fund, any political party are to be referred to the Chief Executive Officers of Standard.

Individually

Individuals should feel free to engage in legal political activity in their personal capacity, but should not make use of Standard Bank resources or time for this purpose. When personal relationships exist with political role players, Standard Bank employees should guard against those relationships being used to influence unfairly either political decision making or decision making in Standard Bank.



5.4 Being proactive

We strive to stay ahead by anticipating rather than reacting, but our actions are always carefully considered.

5.4.1 Principle: Anticipating and embracing change

We should engage constructively with change by anticipating it wherever possible. We should take personal responsibility for making appropriate changes in our work environments and for supporting and coaching team members through change.

5.4.2 Principle: Encouraging and rewarding innovation responsibly

We should be aware of the potential for value-adding innovation in all products, services, solutions and processes, and encourage and reward employees who innovate within Standard Bank's risk-tolerance levels.

5.4.3 Principle: Maintaining and sharing accurate and useful information

We should keep proper and accessible records, and share non-confidential information with colleagues to facilitate improvement and growth opportunities.

Before sharing information, we should be clear on whether sharing of the particular information type is allowed under local laws and regulations, and if such sharing is not allowed, the information should not be shared.



5.5 Working in teams

We, and all aspects of our work, are interdependent. We appreciate that, as teams, we can achieve much greater things than as individuals. We value teams within and across business units, divisions and countries.

5.5.1 Principle: Being individually accountable for our actions

Individuals, working in teams, should be clear on what their roles are, and should be personally accountable for their responsibilities within the team.

5.5.2 Principle: Preventing favouritism

We should guard against favouritism by not allowing friendships or personal preferences to influence decision making.

5.5.3 Principle: Extracting value from different perspectives

We should value and encourage diversity, since it allows different perspectives and viewpoints to emerge. This includes diversity in the demographics of team make-up, and in thinking and working styles.

5.5.4 Principle: Working in unity

We should promote interdepartmental, interdivisional and interpersonal cooperation for the good of Standard Bank and its stakeholders. This includes sharing successful means of product, service, solution or process improvement.

5.5.5 Principle: Acknowledging both individual and team contributions

We should give credit to individuals when it is due and credit to teams when it is due. In doing so, we should recognise that the ultimate team is Standard Bank, and this is where individual's first loyalty should lie.



5.6 Respecting each other

We have the highest regard for the dignity of all people. We respect each other and what Standard Bank stands for. We recognise that there are obligations corresponding with our individual rights.

5.6.1 Principle: Recognising human dignity

We should strive to ensure that all employees, customers, and other stakeholders have a dignified experience in their interactions with Standard Bank.

5.6.2 Principle: Valuing Standard Bank and that for which it stands

We should represent Standard Bank, its activities and its employees (at all levels) positively in interacting internally and with external stakeholders. In instances in which we observe that there is room for improvement, we should commit to contributing to this improvement in a positive manner.

5.6.3 Principle: Providing a work environment free of harassment and intimidation

We should create a work environment that is free of harassment and intimidation. This should be achieved by behaving courteously and respectfully and by not engaging in behaviour that may be perceived to intimidate or harass others.

5.6.4 Principle: Complying with occupational health and safety regulations

We should take all reasonable measures to prevent workplace accidents and injuries. We should adhere to occupational health and safety laws in the relevant jurisdictions, as well as Standard Bank's occupational health and safety standards.

5.6.5 Principle: Protecting Standard Bank's physical assets

We should treat Standard Bank's property, equipment and other physical assets with care and respect. Assets to which we have legitimate access, such as laptop computers, should not be used unreasonably for purposes other than company business.



5.7 Upholding the highest levels of integrity

Our entire business model is based on trust and integrity as perceived by our stakeholders, especially our customers.

5.7.1 Principle: Being honest

We should act truthfully and honestly with all stakeholder groups, such as employees, customers, shareholders, suppliers and competitors. Being honest also implies observing the laws, rules and regulations of the countries in which we operate and honouring contractual agreements. In addition, we should not misrepresent ourselves or Standard Bank, not submit false information, not manipulate systems for improper personal gain, not engage in activities such as “insider trading” and not engage with competitors in ways that go beyond accepted competitive practice.

5.7.2 Principle: Avoiding both actual and perceived conflicts of interest

We should avoid placing ourselves in positions in which personal interests conflict with our duties to Standard Bank. This includes disclosure of personal or family interests that could influence business dealings within or with Standard Bank. When representing Standard Bank, we should be aware of the potential for, and actively manage, conflicts of interest between different areas or customers of Standard Bank, or Standard Bank and its customers.

5.7.3 Principle: Accepting gifts and entertainment responsibly

We should never accept cash as a gift, and non-cash gifts or entertainment should not be accepted if the impression is created that an improper business advantage could be secured. In addition, we should follow business unit policy on prohibition or limits, in terms of value and frequency, above which we should declare acceptance of non-cash gifts and entertainment.

5.7.4 Principle: Giving gifts and entertainment responsibly

We should never give cash as a gift, and non-cash gifts or entertainment should not be given if the impression is created that an improper business advantage could be secured. In addition, we should follow business unit policy on prohibition or limits, in terms of value and frequency, above which we should declare giving of non-cash gifts and entertainment.

5.7.5 Principle: Avoiding illegitimate commission payments

We should pay and disclose commission for business brought to Standard Bank only to legitimate agents. We should not pay commissions or fees to agents for the purpose of engaging in illegal or unethical activities, or commissions or fees that cannot reasonably be justified (in nature and amount) for the type of work required.

5.7.6 Principle: Combating and reporting unethical and criminal activities

We have an obligation to seek advice or report unethical conduct or criminal activity, or suspicion thereof, including theft, fraud, corruption or intimidation. Whistle-blowers should be protected from victimisation.



5.8 Constantly raising the bar

We have confidence in our ability to achieve ambitious goals and we celebrate success, but we must never allow ourselves to become complacent or arrogant.

5.8.1 Principle: Having the confidence to achieve ambitious goals

We should strive for the achievement of ambitious goals, as individuals and as teams.

When celebrating our successes, we should guard against complacency, we should not undermine or discredit others, or become arrogant.

5.8.2 Principle: Meeting the legitimate expectations of our stakeholders

We should seek to understand the perspectives of stakeholders in respect of issues that affect them, and we should factor these perspectives into our solutions.

This should include consultation with colleagues in other business areas when appropriate.

5.8.3 Principle: Expressing personal identity with dignity and tolerance

We should not impose our personal philosophies and beliefs on others. We should recognise that different people have different perspectives, and any misunderstandings should be explored constructively and in a spirit of mutual respect.



6. Ethics enabling mechanisms

At times, you may be uncertain whether a decision or action that you are required to carry out is consistent with the letter and spirit of the Code of Ethics. You may then wish to obtain advice on how to proceed.

At other times, you may suspect or believe that you have observed conduct inconsistent with the letter and spirit of the Code of Ethics.

Then

- You may wish to clarify whether such conduct is indeed problematic;

or

- You may believe that you have an obligation to report the conduct and individual involved.

In such situations, Standard Bank provides safe and reliable enabling mechanisms for you to work through and resolve issues, namely, the;

- Ethics advice process; and
- Ethics reporting process.

Please note the following

- Where possible, you should attempt to resolve a particular issue where it happened, or through the advice process (or other applicable business unit informal processes), before reporting it; unless reporting is appropriate under local business unit procedures (for example, whistle-blowing procedures) or when you suspect theft, fraud, or corruption.
- The ethic advice and reporting processes are not meant to override local business unit advice or reporting mechanisms (for example, local grievance, whistle-blowing, money laundering or other compliance or human capital policies or procedures), but rather to align with them, and make use of them wherever appropriate. If you need guidance on the appropriate approach to take, you should discuss this with your line manager or business unit human capital business partner.



6.1 Ethics advice process

You have an obligation to confidentially seek advice by following the process below until your issue has been addressed.

1

Resolve the issue by yourself, or with one of your team members, by

- Referring to a principle in the Code of Ethics; or
- Working through the ACTION principles in the Code of Ethics (Section 7); or
- Referring to other local business unit or group policies or procedures.

If you believe that you cannot do this for any reason (or if those involved have any doubt about their judgement):

2

Resolve the issue by means of a confidential discussion with your direct line manager (or other appropriate person, as set out in applicable local business unit procedures).

If you believe that you cannot do this for any reason (or if those involved have any doubt about their judgement):

3

Resolve the issue by means of a confidential discussion with your business unit human capital business partner.

If you believe that you cannot do this for any reason (or if those involved have any doubt about their judgement):

4

Resolve the issue by means of a confidential discussion with your business unit human capital executive.

Issues that are brought to the attention of managers, human capital business partners, or human capital executives will be resolved through one of the following mechanisms (depending on the nature of the issue):

- Reference to appropriate local business unit or Standard Bank policies or procedures; or
- One-on-one discussion between the person raising the issue and the manager, human capital business partner or human capital executive; or
- Facilitation of a discussion amongst the affected parties; or
- Facilitation of a discussion between the affected parties and other knowledgeable employees (for example, compliance officers, other senior managers) – in the most complex cases, the business unit ethics officer may be consulted; or
- Referral to the ethics reporting process.

Please note the following

- Standard Bank requires all employees to request ethics advice in the event of uncertainty.
- All managers, human capital business partners, human capital executives and ethics officers are required to deal with requests for ethics advice with the strictest confidentiality.
- Where possible, employees should follow the appropriate local procedures, and when such procedures do not contain an informal process, employees should report issues under the applicable reporting mechanisms.

Confidentiality

Confidentiality means that the manager to whom you speak will know your identity, but will not make it known to anyone else, unless there is a legal obligation to do so or the ethics officer deems there to be a serious reputational risk to the bank.

6.2 Ethics reporting process

You have an obligation to confidentially or anonymously report observed conduct that is inconsistent with the letter and spirit of the Code of Ethics, and is causing harm to Standard Bank or any of its stakeholder groups, by following the processes below, until your issue has been addressed. Please note, however, that when applicable local business unit procedures set out alternative reporting mechanisms, the local business unit procedures are to be followed.

There are different processes to follow, depending on whether the issue involves theft, fraud or corruption, or other conduct contrary to our values and ethics.

If the issue involves theft, fraud, or corruption:

1 Report the issue confidentially to your line manager.

If you believe that you cannot do this for any reason
(or if those involved have any doubt about their judgement):

2 Report the issue via the Ethics and Fraud Hotline or other appropriate local business unit reporting or whistle-blowing mechanism.

If the issue involves other conduct contrary to our values and ethics:

1 Report the issue confidentially to your line manager.

If you believe that you cannot do this for any reason
(or if those involved have any doubt about their judgement):

2 Report the issue confidentially to your business unit human capital business partners.

If you believe that you cannot do this for any reason
(or if those involved have any doubt about their judgement):

3 Report the issue confidentially to your business unit human capital executive.

If you believe that you cannot do this for any reason
(or if those involved have any doubt about their judgement):

4 Report the issue via the Ethics and Fraud Hotline (see notes below) or other appropriate local business unit reporting or whistle-blowing mechanism.

Issues that are reported will be subject to an informal preliminary investigation, after which they will be resolved through one of the following mechanisms (depending on the nature of the issue):

- Referral to one of the informal resolution mechanisms described in the ethics advice process, or other appropriate procedure; or
- Referral to the appropriate local business unit grievance, disciplinary, compliance or other processes; or
- Referral to the Group Financial Crime Control division for further investigation and action; or
- Referral to the appropriate business unit ethics officer for his/her personal attention.

Please note the following

- Contact details of Ethics and Fraud Hotlines are listed in section 8.
- Confidential rather than anonymous reporting is encouraged. While anonymous reports will be accepted, they may not be acted upon. The reason for this is that it is very difficult to act on allegations without knowing the affected parties or when the evidence is incomplete.
- All reports to the Ethics and Fraud Hotline (and other formal whistle-blowing mechanisms) will be logged with the group ethics officer.
- Malicious reporting will be viewed in a very serious light.

Anonymity

Anonymity means that you do not reveal your name when reporting an issue. Nobody will know your identity unless you choose to tell someone.

6.3 Business unit ethics officers

Each of Standard Bank's major business units has a senior executive who is responsible for driving activities in respect of values and ethics in the business unit and for representing the business unit on any ethics related forums. There is also a group ethics officer, whose role is to coordinate issues related to values and ethics across Standard Bank. Note that values and ethics should be integrated into the day-to-day work of all employees – the purpose of the ethics officers is limited to acting as formal focal points and, if required, final arbiters of difficult decisions.

6.4 Responsibility to seek advice or report

It is Standard Bank's responsibility to ensure that safe and effectively managed processes are in place for employees to seek advice or report unethical conduct.

In turn, it is the responsibility of all employees to report unethical conduct or to seek advice when they are uncertain about the ethics of any decision or course of action.

6.5 Custodianship

Every employee has a stake in the Code of Ethics.

The Group Ethics Officer and the Chief Executive Officers' are the formal custodians of the Code of Ethics and are responsible for its management and improvement.

If you have any queries or suggestions regarding the content of the Code of Ethics, please feel free to contact the Group Ethics Officer via the Ethics and Fraud Hotline.

6.6 Certification

The Code of Ethics was certified by the Ethics Institute of South Africa as conforming to the highest international best practice standards.



7. Making value-based decisions

The **ACTION** principles

When faced with a decision or action for which there is no clear principle in the Code of Ethics, it is helpful to think through your options using the **ACTION** principles:

A **Act responsibly**
Useful questions for testing whether you are acting responsibly are:

- Do I have all the information at my disposal?
- Has the information been verified?
- Who is responsible?
- Would my preferred choice of action create trust amongst other employees?

C **Consider Standard Bank's values and ethical principles**
Useful questions for testing whether you are considering Standard Bank's values and ethical principles are:

- Does my preferred choice of action reflect our value of integrity?
- Is it aligned with other Standard Bank values and principles?

T **Trust your judgement**
Useful questions for testing whether you trust your judgement are:

- Is my preferred choice of action fair?
- Is it the right thing to do?
- How would it look if published on the front page of a newspaper?

I **Identify the impact on stakeholders**
Useful questions for testing whether you are identifying the impact on stakeholders are:

- Does my preferred choice of action impact positively on our customers?
- Bearing in mind that Standard Bank values teams, does it impact positively on a group of employees or a team, or on only one individual?
- Does it impact positively on other stakeholders, for example, shareholders, and society?

O **Obey the rules**
Useful questions for testing whether you are obeying the applicable rules are:

- Does my preferred choice of action comply with the relevant laws and regulations?
- Does it comply with the relevant best practice guidelines?
- Does it comply with Standard Bank policy?

N **Notify the appropriate persons**
Useful questions for testing whether you are notifying the appropriate persons are:

- Have I involved the right people to resolve the issue?
- Has communication been open and honest?
- Have potential problems been disclosed?



8. Contact details for Ethics and Fraud Hotlines

Please refer to the Standard Bank Group Intranet and/or website for the contact details which you may use to report to our hotline on ethical issues or fraud issues.

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Living our values

Serving our customers

Growing our people

Delivering to our shareholders

Being proactive

Working in teams

Respecting each other

Upholding the highest levels of integrity

Constantly raising the bar

