Standard Bank

AFRICA IS OUR HOME, WE DRIVE HER

Kalahari Desert **Namibia**

STANDARD BANK GROUP

SUSTAINABILITY DISCLOSURES REPORT 2024

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STANDARD BANK GROUP SUSTAINABILITY DISCLOSURES REPORT 2024

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This report covers the period 1 January to 31 December 2024. Please direct any queries or comments to: **GroupSustainability@standardbank.co.za**

Navigating this report

The navigation tools for this report can be found at the top right of each page and within the report.

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OUR REPORTING SUITE

Our suite of reports caters for the diverse needs of our stakeholders.

INTEGRATED REPORTING

Annual integrated report

Serves as an overarching report to our reporting suite. It provides a concise and balanced view of how we create, preserve and erode value while delivering sustainable growth.

Shareholder reporting

Annual financial statements
Contains the group's full audited annual financial statements, including the report of the group audit committee.

Risk and capital management report
Sets out the group's approach to risk management and Pillar III disclosures of the Basel Framework.

Governance report
Disclosures of the group's governance approach and priorities, aligned to the principles of King IV[1].

Remuneration report
Sets out the group's remuneration policy and implementation report and includes a background statement from the remuneration committee chair.

Subsidiary annual reports
Our subsidiaries account to their stakeholders through their own annual and/or other reports and information, available on their respective websites, accessible from **www.standardbank.com**

Sustainability reporting

THIS REPORT

Sustainability disclosures report
An overview of how we manage environmental, social and governance (ESG) risk.

Report to society (RTS)
An overview of our impact on society, the economy and the environment, focusing on the four areas in which we have the most significant impact, together with a brief description of our corporate social investment (CSI) activities.

Climate-related financial disclosures report
Discusses how the group is managing the risks and responding to the opportunities presented by climate change.

1 King IV Report on Corporate Governance for South Africa 2016 – copyright and trademarks are owned by the Institute of Directors of South Africa NPC and all of its rights are reserved.

Scope and reporting boundary

This report covers the period 1 January 2024 to 31 December 2024 and includes material events and information up to board approval on 12 March 2025. The data in this report, financial and non-financial, pertains to the Standard Bank Group as the reporting entity and includes all entities over which we have control or significant influence, except where otherwise indicated. Our sustainability reports are published annually at the end of March. Our annual financial statements were published on 13 March 2025.

Report preparation

The board ensures the integrity of our external reporting through internal reporting processes that are well embedded and supported by various levels of oversight. The social, ethics and sustainability board sub-committee provides oversight of this report.

Assurance statement

PricewaterhouseCoopers Inc. (PwC) provided limited external assurance on selected performance data in this report, indicated by ✓ in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised), ISAE 3410, and assurance engagements on greenhouse gas statements (ISAE 3410). PwC's limited assurance report can be found **here.** Information about the assured indicators can be found **here**.

Our digital reporting portal

All our reports, latest results, presentations and SENS announcements along with a glossary of financial terms, other definitions, acronyms and abbreviations used in our reports are available **here**.

We are aware of the developments in corporate sustainability reporting, particularly the IFRS Foundation's International Sustainability Standards Board's sustainability disclosure standards, published to meet the growing capital market demand for information on how sustainability-related matters impact an organisation's enterprise value and how these impacts are being managed. We are considering these standards and working toward alignment.

For further information or queries, please contact **GroupSustainability@standardbank.co.za.**

WHO WE ARE

PURPOSE DRIVEN

Africa is our home, we drive her growth

FOCUSED

We are Africa focused, client led and digitally enabled	We provide comprehensive and integrated financial and related solutions to our clients	We drive inclusive growth and sustainable development

Comprehensive financial services offering

PPB	Personal & Private Banking	16.1 million clients in 15 countries
CIB	Corporate & Investment Banking	R50.6 billion client revenues in 20 countries
BCB	Business & Commercial Banking	816 000 clients in 16 countries
IAM	Insurance & Asset Management	R1.5 trillion assets under management

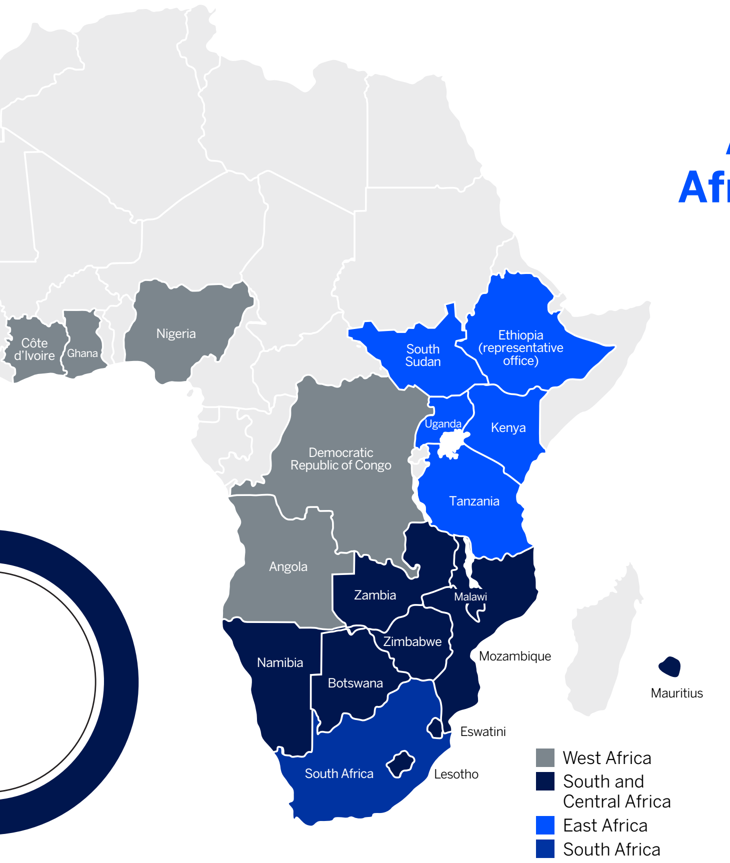
Shareholding

South Africa	49
China	20
United States	13
Other	10
Europe	8

MARKET CAPITALISATION

USD20 billion

(R368 billion)



A leader on the African continent

20 sub-Saharan African countries

4 global centres in Beijing, Dubai, London and New York

2 offshore hubs in Isle of Man and Jersey

Headquartered in Johannesburg, South Africa, with a primary listing on the Johannesburg Stock Exchange (JSE) in South Africa

Secondary listing in Namibia and A2X Markets in South Africa

Subsidiary banks listed on exchanges in Kenya, Malawi, Namibia, Nigeria and Uganda

- Founding signatory of the United Nations Environment Programme Finance Initiative's (UNEP FI) Principles for Responsible Banking (PRB)
- Most valuable banking brand in Africa and South Africa, Brand Finance
- African Banker's Sustainable Bank of the Year 2024
- Best Bank for Sustainable Finance in Africa, Global Finance Sustainable Finance Awards 2025
- One of the World's Best Companies, Time
- One of the World's Best Employers, Forbes

MESSAGE FROM THE SBG CHAIRMAN

Nonkululeko Nyembezi
Chairman

Standard Bank's purpose is to drive Africa's growth. Our approach to sustainability is two-pronged: we aim to maximise positive impact, and effectively manage ESG risk.

We make a major positive contribution to Africa's economic and human development. We have identified four areas in which we can make a material impact toward achieving societal value, namely: financial inclusion, business growth and job creation, climate change mitigation and adaptation, and infrastructure development. Our 2024 materiality assessment process included the refinement of the metrics and targets we use to assess success in each impact area. Our report to society provides an annual update on our performance.

This report focuses on our management of ESG-related risk. It includes descriptions of our governance processes, relevant policies, risk management processes, and where applicable, incidents and how we have dealt with them. Focus areas include how we do business, how we ensure fair treatment of our clients, our role in combatting financial crime and corruption, and what we are doing to keep our systems, and our clients' assets and personal data, safe from cyber-crime.

Our success and sustainability depend on our people. **Section 5** provides insights into our policies and programmes to attract, retain and develop our employees, including our focus on diversity and inclusion, equitable treatment, and ongoing skills development in the face of a rapidly changing world of work. We are delighted to have once again been recognised by Forbes as one of the World's Best Employers, ranking 18 out of 850 large multi-national and multi-jurisdictional organisations from over 50 countries.

We recognise that driving economic growth and social development may result in negative environmental impacts. At all times, we commit to thoroughly assessing environmental and social (E&S) risks associated with our business activities, and ensuring we do all we can to maximise benefit and mitigate harm. E&S risk management is built into our enterprise-wide risk management systems and relevant policies, standards and processes. We continue to strengthen our E&S risk management capacity across the group, with the expansion of E&S screening and due diligence to commercial clients and all business clients in premium segment and integration of climate risk into the E&S risk screening tool and due diligence processes. Details are provided in **section 2**.

2024 marks five years since we became a founding signatory to the UN Principles for Responsible Banking (PRB). The PRB provides the world's foremost sustainable banking framework, with 330 signatory banks representing over half of the global banking industry. SBG is a member of the United Nations Environment Programme Finance Initiative (UNEP FI) Leadership Council, and UNEP FI Banking Board. We also participate in a variety of PRB working groups, which provide exposure to emerging global guidance and good practice, and opportunities to engage with and learn from peer banks.

The UNEP FI Secretariat provides SBG with an annual assessment of our progress, including our areas of strength and recommendations for improvement. In 2024, our areas for improvement included the need to:

- Set impact targets, in addition to mobilisation of finance targets, for our impact areas
- Consolidate action plans for established targets and demonstrate progress using relevant key performance indicators (KPIs)
- Engage with clients to support the achievement of our climate targets, including the assessment of and support for climate transition plans
- Publish financed emissions baselines and reduction targets and a transition plan.

I am pleased to report that our sustainability reporting suite provides progress updates on all these areas. As noted, we are maturing our approach to target setting, with a focus on impact in addition to input, and the refinement of KPIs. The board and executive management have agreed to strengthen our reporting regarding how performance against sustainability KPIs impact executive performance assessment and remuneration.

We have made good progress on embedding climate-related risk into enterprise risk management systems and decision-making processes. In 2024, we participated in the South African Reserve Bank's (SARB) climate risk stress test, along with the country's other major banks. The process required strong collaboration across business units, sector teams and group risk, and the close involvement of relevant executives. It was unquestionably challenging, but we are very pleased with the progress made. We will take forward the lessons learned as we further mature and expand our approach to climate risk management across the group.

Our 2024 Climate-related financial disclosures report includes baseline emissions for four sectors. Additional sectors are on course to publish their baselines next year. Our revised group climate policy includes updated climate targets, including a financed emissions reduction target for upstream oil and gas, and a target to mobilise over R450 billion in sustainable finance by 2028.

The group also spent time developing our understanding of nature-related risks, opportunities, dependencies and impacts. We participated in the SARB and Prudential Authority's pilot project to build an understanding of nature-related risk for South African banks. This process provided useful learning that we will take forward in 2025 as we continue to build our capacity in this regard.

We continue to monitor developments regarding sustainability reporting standards. Several of our countries of operation have indicated their intention to adopt the IFRS Sustainability Disclosures. Nigeria has published a roadmap toward making this reporting mandatory, while South Africa has published guidance notes for banks and insurers on climate-related disclosures, which align with the IFRS guidance. We have identified a number of areas in which we need to strengthen our reporting to align with the standards. We are building the relevant systems and capacity at group and country level and are making good progress.

Nonkululeko Nyembezi
Chairman, SBG

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OUR STRATEGIC PRIORITIES AND MATERIAL SUSTAINABILITY ISSUES

OUR STRATEGIC PRIORITIES AND VALUE DRIVERS

We are driven by our purpose. **Africa is our home, we drive her growth.**

Our strategy enables us to achieve our purpose. We have three strategic priorities:

- Transform the client experience, by providing a comprehensive set of solutions that meet client needs
- Execute with excellence and do the right business, the right way
- Create sustainable growth and value for our shareholders, society and the planet.

We execute our strategy by defending and growing our competitive advantages in our chosen segments and markets, while pursuing growth opportunities. This includes:

- Leading Africa's energy and infrastructure development
- Building Africa's best private bank, with market leading propositions tailored to our clients' banking, insurance and investment needs,
- Maximising the value of our diversified portfolio across 20 African countries.

We use **six value drivers** to measure our performance and the value we aspire to create for all our stakeholders. **Metrics** associated with our value drivers are linked to our remuneration scorecards.

Client focus

We understand our clients and provide them with the products and services they need to make life better.

We are responsive to their changing expectations.

We ensure fair outcomes for our clients.

Risk and conduct

We operate with integrity and hold ourselves to high ethical standards.

We understand the risks and opportunities facing our business and have robust policies and processes to manage them.

We ensure the security of our information and that of our clients and we guard against cyber threats.

Employee engagement

Our employees believe in our purpose and their role in achieving it.

They are productive, motivated and engaged.

They reflect the diversity of the communities in which we work.

They strive to learn, grow and adapt to the changing world of work.

They feel valued and respected.

Operational excellence

Our systems are reliable, resilient and trusted.

Our digital channels are always-on, always secure.

We are here for you when you need us.

Positive impact

We achieve positive impact by understanding Africa's needs and challenges and delivering solutions to address these. This includes:

- Financial health and inclusion
- Business growth and job creation
- Climate change mitigation and adaptation
- Infrastructure development.

We balance social, economic and environmental considerations to drive sustainable growth.

Financial outcome

We deliver sustainable growth and value to our shareholders.

Our approach to sustainability

To deliver our strategy and achieve our purpose, we must ensure that our business activities solve Africa's challenges and deliver improved prosperity for Africa's people. This approach enables us to generate attractive financial outcomes for our shareholders, while generating positive social, economic and environmental impact for the communities in which we operate.

We commit to aligning our strategy with the United Nations Sustainable Development Goals (UN SDGs), the Paris Climate Agreement, the UN Guiding Principles on Business and Human Rights, and sustainable banking frameworks in our countries of operation, in line with our commitments as a founding PRB signatory. This includes identifying opportunities to maximise positive impact, and effectively managing the potential negative impacts arising from our activities, products and services. This commitment informs the two pillars of our sustainability approach.

1 Maximising positive impact

Our business activities drive positive impact in four areas:

- Financial health and inclusion
- Business growth and job-creation
- Climate change mitigation and adaptation
- Infrastructure development.

2 Effectively managing risk

We actively identify and manage potential risks and negative impacts, focusing on areas such as:

- Effective management of environmental and social risk associated with our lending and investment activities
- Fair treatment of customers
- Information security, data privacy and cybersecurity
- Combatting financial crime
- Employee engagement.

We have clear KPIs and targets in relation to both pillars, which are applied across the group and regularly reported to management and the board. These inform performance management assessment and remuneration decisions.

Leading Africa's energy and infrastructure development and enabling decarbonisation of Africa's economies

Our role in leading Africa's energy and infrastructure development is central to maximising positive impact. We partner with Africa's governments and businesses to mobilise the investment needed to enable access to affordable and reliable energy, water, roads, transport and telecommunications. At the same time we implement appropriate risk management to protect the functioning of the environmental ecosystems on which we depend.

As an African bank, with a deep understanding of Africa's economic and developmental challenges, we take a considered and responsible approach to decarbonisation. Guided by the need for a just transition and the Paris Agreement's principle of 'common but differentiated responsibilities', we recognise that while there's a duty on all countries to take climate action, the types of action they take will depend on their national circumstances. Rapid disinvestment in coal, oil and gas production is neither practical nor responsible in African economies with a heavy reliance on these fuels.

Robust due diligence and responsible client selection are critical to our approach, We are engaging with our clients regarding sector transition pathways and the potential for technological developments to support and accelerate Africa's clean energy transition.

We also continue to advocate for supportive policy and regulatory frameworks at national and regional level.

We enable our clients to support their sustainability objectives, including emissions reduction and climate resilience. Our sustainable finance solutions include use of proceeds and general purpose instruments. Our mobilisation of sustainable finance is defined as the arranging and lending activities in relation to all sustainable finance categories, including eligible green, social, sustainable and sustainability-linked transactions (excluding treasury activities).

Our sustainable finance frameworks ensure consistency, transparency and credibility in reporting on progress against our sustainable finance targets. We aim to mobilise over R450 billion in sustainable finance between 2022 and 2028.

We continue to prioritise investment in renewable energy while also supporting a wider range of activities that support the transition to a low carbon economy. Some of these are categorised as sustainable finance and have been independently reviewed and approved as such. Others are not eligible to be categorised as sustainable finance, but are nonetheless critical to support the decarbonisation of Africa's economies. We will continue to finance these activities, under clear and strict parameters as set out in SBG's climate policy, and in line with our commitment to achieve net zero portfolio emissions by 2050.

Sustainable Finance Product Framework

Sustainable finance mobilisation target > R450 billion (2022 – 2028)

General purpose (Sustainability-linked/pure play)	**Green eligible activities** (including renewable energy infrastructure and climate change mitigation and adaptation)	**Social eligible activities** (including financial inclusion and affordable basic infrastructure)	**Transition eligible activities** (including hard to abate sectors like cement and use of gas)
	Target >R100 billion (2025 – 2028)	**Target** >R100 billion (2025 – 2028)	**Decarbonisation activities** (activities that support our clients in hard to abate sectors such as oil and gas, mining, cement and energy, which remain crucial to Africa's economic growth and development)

SBG Sustainable Finance Framework (published 2023)

Our efforts to maximise positive impact and minimise risk are informed by:

- Global frameworks and standards, including those in the table alongside
- Our knowledge of and experience in the markets in which we operate and the clients we serve
- Our internal policies, including the SBG code of ethics and conduct, our third party code of conduct, the SBG human rights statement, our E&S risk management system and associated policies, our group Sustainable Finance Framework and our group climate policy
- Ongoing engagement with diverse stakeholders to assess the impacts of our business on people, the economy and the natural environment, across our value chain.

Sustainability frameworks and associated obligations

Framework	Key objectives/ requirements	Responsibility	Governance
UN SDGs and African Union (AU) Agenda 2063	Contribute to achieving sustainable and inclusive development and positive social, economic and environmental impact for all, with a specific focus on equality, gender, education, health, energy decarbonisation, sustainable industry and cities, and sustainable food, land, water and oceans	Business units (BUs) help identify and integrate SBG's positive impact metrics into strategy	SBG board approves positive impact areas and related metrics and oversees progress
Paris Climate Agreement	Pursue efforts to limit the global temperature increase to 1.5°C above pre-industrial levels	BUs integrate climate policy and targets into strategy	SBG board approves climate policy and targets and oversees progress
UN Guiding Principles on Business and Human Rights	Ensure respect for human rights as defined by the International Bill of Human Rights and International Labour Organization's Declaration on Fundamental Principles and Rights at Work; avoid causing or contributing to adverse human rights impacts; undertake due diligence to identify, prevent, mitigate and account for how we address our impacts on human rights; and implement processes to enable remediation of any adverse human rights impacts we cause or contribute to	Group sustainability works with relevant teams to monitor risk and ensure appropriate controls	SBG board approves human rights statement and supporting policies
UN Principles for Responsible Banking	Align business strategy to contribute to society's goals, set KPIs and targets to maximise positive impact and minimise negative impact; engage clients to encourage responsible practices, engage proactively with stakeholders to achieve society's goals; and report transparently on progress	Group sustainability partners with business to agree metrics, targets and ways of working	Group social, ethics and sustainability committee (GSESC) approves Principles of Responsible Banking (PRB) targets and oversees progress
UN Principles for Responsible Investment	Incorporate ESG issues into investment analysis and decision-making, be active owners and incorporate ESG issues into ownership policies and practices, seek appropriate disclosure on ESG issues by the entities in which we invest, promote acceptance and implementation of the Principles within the investment industry and report on our activities and progress	The group's investment and asset management business, represented by Liberty and Stanlib, are members of the PRI and incorporate the principles into their investment process. We also align with the Code for Responsible Investing in South Africa (CRISA)	Stanlib and Liberty boards approve PRI annual report
Equator Principles	Undertake E&S screening and due diligence to identify, assess and manage E&S risks associated with lending activities	Group E&S risk partners with business from pre-credit stage and undertakes ongoing monitoring	Group risk oversight committee (GROC) approves the E&S risk management governance standard and policy
Sustainable banking requirements in our countries of operation	Country specific requirements including the Ghana Sustainable Banking Principles, Nigerian Sustainable Banking Principles, and Kenya Sustainable Finance Guiding Principles.	In-country executive teams	Country boards

Progress and milestones on **SBG's sustainability journey**

2017–2018

Adopted five value drivers, including social, economic and environmental impact, and committed to report on performance in specific impact areas based on core business activities

2019

- Formalised ESG governance structures at board and executive level
- Became a PRB founding signatory
- Reported impact across seven areas, with activity level metrics
- Established sustainable finance team in CIB

2020

- Adopted revised group ESG risk governance framework inclusive of climate risk
- Integrated ESG risk into SBG enterprise risk management framework
- Published SBG Sustainable Bond Framework
- Published first Climate-related disclosures report and fossil fuels finance policy

2021

- Board approved refreshed sustainability approach based on twin pillars of achieving positive impact and managing ESG risk
- Launched bespoke climate focused executive development programme with University of London's School of Oriental and African Studies (SOAS)
- First SBG Climate Conference for employees and clients

2022

- Subsidiary board members undertook training on climate change
- Published revised group code of ethics and conduct, based on three pillars: Market conduct, Personal conduct, Conduct in society
- Published climate policy, with commitments to reach net zero for financed emissions by 2050, and target for sustainable finance mobilisation
- Adopted group wide climate risk management programme
- Joined PCAF to build capacity to measure financed emissions

2023

- Included climate risk assessment in E&S risk assessment process
- Refined positive impact areas to four
- Implemented conduct programme and targeted training
- Expanded climate commitments and targets to encompass additional priority sectors
- Implemented climate risk scenario analysis and stress testing pilots
- Published SBG Sustainable Finance Framework
- Implemented sustainability and climate training for employees across business areas and risk functions
- GLC workshop to discuss salient human rights and impacts
- Participated in UNEP FI working group on nature

2024

- Expanded employee training programmes on ESG, sustainability and climate across sectors and countries
- Published baseline financed emissions for oil and gas
- Developed financed emissions baselines for coal mining, residential mortgages and commercial real estate
- Participated in SARB climate risk stress test pilot
- Agri team participated in Encore pilot with SARB
- Gathered stakeholder views on material nature-related risks and impacts and salient human rights risks and impacts, as part of materiality assessment

Identifying and prioritising our sustainability-related risks and opportunities

Standard Bank undertakes an annual materiality assessment✓ to assess our most significant sustainability risks, opportunities and impact, that could affect our prospects over the short, medium and long term.

We use the double materiality principle – we consider a sustainability issue as material if it presents:

- **Impact materiality:** significant actual or potential impact by SBG on society and/or the environment, and
- **Financial materiality:** ESG-related risks or issues that have or could have a significant impact on our business performance, shareholder value creation, our reputation and/or our relationships with key stakeholders.

We gather input from internal and external stakeholders to identify our material sustainability issues. Thereafter, we engage with relevant teams across the group to agree appropriate metrics, targets and action plans for each issue. The social, ethics and sustainability board committee oversees the annual assessment and approves the issues and associated metrics and targets. We report progress to relevant executive committees and the board committee on a quarterly basis.

Process for determining our material issues

Our assessment is guided by:

- Our purpose: Africa is our home, we drive her growth, and our commitment to provide a comprehensive suite of financial and related services to support sustainable and inclusive economic growth
- Our context as an African financial services organisation operating in 20 African countries, guided by the priorities for economic and human development as articulated by the UN SDGs and the AU's Agenda 2063. We prioritise the issues where our impact is likely to be greatest
- Regular engagement with our stakeholders, and annual engagement specific to the materiality process.

STEP 1 Identification of issues based on research, internal priorities and internal and external stakeholder engagement

External stakeholder priorities

- Issues identified through engagements with regulators, policymakers, clients, industry bodies, trade unions and civil society organisations in our countries of operation, reported to the board through quarterly stakeholder engagement reports
- Issues raised at SBG's annual general meeting (AGM)
- Priorities/areas for improvement identified by ESG rating agencies
- Desk-research on issues impacting our operating environment, including central bank priorities and trade association plans
- Material issues identified by global and South African banks

Internal priorities

- Issues prioritised by SBG GLC and board committees
- SBG's enterprise risks, existing and emerging factors that may impact on the group in the short to medium term
- Annual 'Are you a Fan' employee survey
- Strategy office's review of megatrends shaping the future competitive landscape

Annual survey

- Feedback on draft material issues from stakeholder groups
  - 25 responses from internal stakeholders, including sustainability and risk teams across our countries of operation
  - Eight responses from civil society organisations
  - Two responses from industry associations

STEP 2 Development of initial list of issues for verification and prioritisation

Based on the information above, we developed a draft list of material sustainability risks and impacts for 2024, and asked business and relevant corporate function executives to provide input on the prioritisation of issues, based on the significance of impacts (scale and likelihood) for the business, and for society and the planet. We also invited these stakeholders to comment on whether any issues should be removed from or added to this list. 36 teams, across group and countries, participated in this engagement. We developed a priority matrix on this basis.

STEP 3 Management and board approval

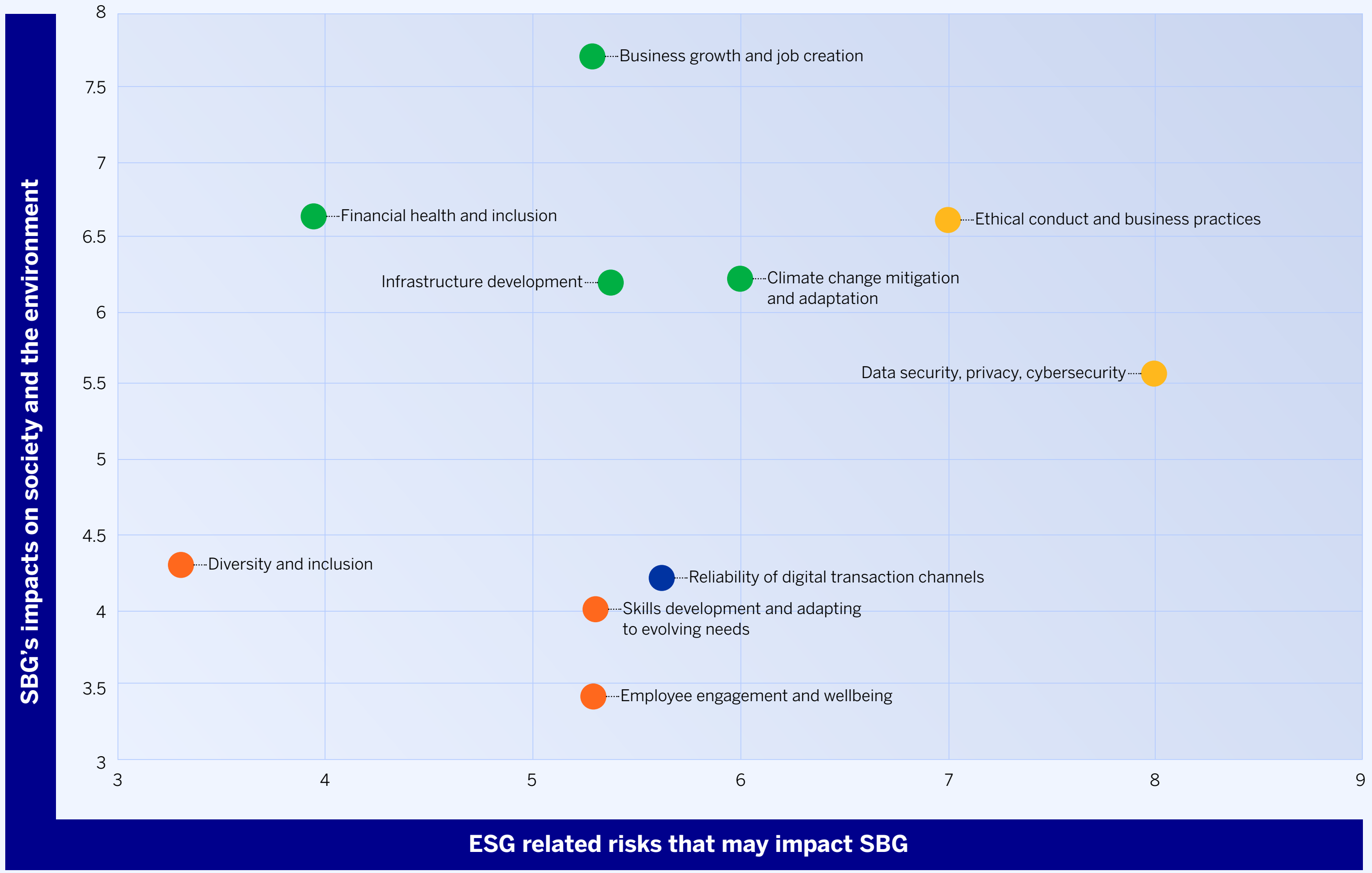
The materiality process, issues and matrix, and associated measures and targets, were reviewed by the social, ethics and sustainability management committee and then approved by GSESC in November 2024.

Material issues 2024

We prioritise our sustainability risks, opportunities and impacts according to the feedback received from our stakeholders.

Material issue	SBG value driver	Where to find out more
Impact on society, economy and environment, with a focus on four major impact areas: ▪ Financial health and inclusion ▪ Business growth and job creation ▪ Climate change mitigation and adaptation ▪ Infrastructure development	Positive impact	**Report to Society** **Climate-related financial disclosures report**
▪ Ethical conduct and business practices ▪ Data security, privacy, cybersecurity	Risk and conduct	**This report**
▪ Reliability of digital transaction channels	Operational excellence	**This report**
▪ Employee engagement and wellbeing ▪ Diversity and inclusion ▪ Skills development and adapting to evolving needs	Employee engagement	**This report**
Focus areas for the group not included as separate materials issue for purposes of sustainability reporting		
In 2023, we included improving client experience, competitiveness and changing client expectations, and fair outcomes for clients as material sustainability issues. In 2024, our focus is on ethical conduct and business practices, which incorporate the above.	Client focus	**Annual Integrated Report**
We aim to achieve positive financial returns through positive impact, and to manage ESG risk to mitigate financial risk.	Financial outcomes	**Annual Integrated Report**

RANKING OF SUSTAINABILITY RISKS AND IMPACTS ON OUR BUSINESS AND ON SOCIETY



Explanation of our material issues

Maximising positive impact

- **Rationale:** We are committed to doing business in a way that maximises positive impact on society, economy and the environment, while minimising the risk of harm as far as possible. We focus on four major impact areas: financial health and inclusion, business growth and job creation, infrastructure development, and climate change adaptation and mitigation.
- **How we manage this:** We have adopted group-wide metrics to track our impacts in each area. We are conscious that our business activities may also give rise to E&S risk, which may impact our employees, our clients, the individuals and enterprises in our supply chain, and the communities impacted directly or indirectly by our business activities. We manage E&S risk through our E&S risk management system, human rights statement, exceptions list, restricted activities list, high-risk sector guidelines and climate policy, as discussed later in this section.
- **Change since 2023:** We have refined this impact area to better reflect the group's social, economic and environmental impacts and enable clear identification of input and impact metrics.

2023	2024	Status
Managing climate risk	**Climate change mitigation and adaptation**	Growing importance
Balancing social, economic and environmental impact for Africa's growth	**Business growth and job creation**	New/refined focus
Delivering positive impact for Africa's people	**Financial health and inclusion**	
Supporting Africa's just energy transition	**Infrastructure development**	

Ethical conduct and business practices

- **Rationale:** We strive to deliver fair outcomes and market integrity by doing the right business the right way and upholding the trust of our stakeholders. Inappropriate conduct and behaviour in the execution of business activities poses a risk to the group's clients, the market and the group. This risk encompasses governance arrangements, business models, product development, sales practices, treating clients fairly, and remuneration and incentive structures.
- **How we manage this:** We are committed to treating all clients fairly and applying policies equitably to all. We expect every employee to uphold the highest level of integrity and take accountability for their actions in line with our values and code of ethics and conduct. Conduct risk management is integrated into all relevant group policies and processes and managed as part of the group's non-financial risk management framework. All areas of the business submit quarterly conduct dashboards to executive management which include information about risks, complaints and grievances, investigations, breaches and remedial actions taken. The dashboards are reviewed by the social and ethics management and board committees.
- **Change since 2023:** No change.

Data security, privacy, cybersecurity

- **Rationale:** Our ability to do business depends on the integrity of the group's data and information assets and the protection of client privacy. Lapses in our controls and by individual employees risk undermining our efforts to combat financial crime, and negatively impacting our clients.
- **How we manage this:** We prioritise data privacy rights as a fundamental human right and apply robust processes to give effect to the right to privacy. We are vigilant in addressing information risk, cyber risk, client privacy, technology risk and third-party risk. We invest in people, process, technology and organisational controls to safeguard our information assets. We continue to invest in improved capabilities to predict, prevent, detect and respond to cyber incidents. We ensure that third parties acknowledge and comply with group minimum requirements. Information risk, data privacy and cybersecurity receive extensive focus from the board and executives across the group.
- **Change since 2023:** No change.

Reliability of digital transaction channels

- **Rationale:** The stability, security and speed of our IT systems is central to our ability to deliver against our purpose and strategy. The risk of recurring unavailability of digital services erodes our customers' trust in the 'always on, always secure' promise that is core to our platform business value proposition. Outages cause inconvenience and frustration for our customers and impact negatively on our brand and reputation.
- **How we manage this:** We have achieved significant improvements in system stability and have built the necessary processes and culture to ensure that incidents are escalated quickly and effectively. When outages do occur, we have improved communication to impacted customers.
- **Change since 2023:** No change.

Employee engagement and wellbeing

- **Rationale:** Standard Bank employs over 54 000 people. We depend on our people to achieve our purpose and deliver against our value drivers.
- **How we manage this:** We aim to ensure that all employees are empowered to perform at their best, feel a strong sense of pride, are engaged in meaningful work and passionate about contributing to the group's success.
- **Change since 2023:** No change.

Diversity and inclusion

- **Rationale:** Our regulators and clients expect our people to represent the populations they serve.
- **How we manage this:** We are committed to diversity and inclusion and strive to ensure respect for and fair treatment of all employees. Diversity and inclusion strategies in our countries of operation are tailored to balance group and local priorities, with all countries focusing on promoting gender equality. In South Africa, our strategies and goals align with local employment equity requirements.
- **Change since 2023:** No change.

Skills development and adapting to evolving needs

- **Rationale:** Digitisation and artificial intelligence (AI) continue to disrupt ways of working, impacting on skills requirements and creating concerns about job security.
- **How we manage this:** Our employees have access to extensive training and career development opportunities, with a specific focus on future skills. We also provide programmes and services to support employee health and wellness.
- **Change since 2023:** Slight change, from 'skills attraction, retention and development'.

	Material issues	Measures	2023	2024	TARGETS	
Employee engagement	**Employee engagement and wellbeing**	Employee net promoter score (eNPS)	+48	**+48**	>+48	•
		Employee voluntary turnover rate	5%	**4.5%✓**	<8%	•
	Workforce diversity and inclusion	Women in executive and senior positions	41.5%	**42%✓**	>42.5%	•
		African representation at senior management level in South Africa	29%	**30%✓**	32%	•
	Skills development and adapting to evolving needs	Learning hours per employee	63	**60**	–	
Risk and conduct	**Ethical conduct and business practices**	Internal measure	–	**–**	–	
	Information security, data privacy, cybersecurity	Significant data privacy breaches	–	**1**	–	
		Material cyber-attack incidents	–	**–**	–	
Operational excellence	**System stability**	Priority (P1) incidents with material client impact	1	**–**	<2	•
		Mean time to repair P1 and P2 incidents (hours)	3.46	**3.45**	<4	•
Positive Impact	**Sustainable finance**	Sustainable finance mobilised	R50.6 billion	**R74.3 billion✓**	R250 billion by 2026 (R177.4 billion✓ since 2022)	•
	Infrastructure development	Sustainable finance mobilised for infrastructure development	R16.3 billion	**R33.6 billion**	–	
		Finance mobilised for new renewable energy powerplants (cumulative 2022 to 2024)	R33.6 billion	**R53.4 billion✓**	R65 billion by 2024	•
		Estimated cumulative installed capacity of renewable energy financing[1]	2.3GW	**4.1GW**	–	
	Climate change mitigation and adaptation	Annual reduction of SBG own emissions (Scopes 1 and 2)	8%	**8%**	Net zero by 2040	•
		Green aligned financing disbursed to homes		**R2.4 billion**		
		Climate smart agri-finance mobilised		**R2.2 billion**		
	Financial health and inclusion	Number and value of affordable home loans per year, South Africa	4 659 loans valued at R2.6 billion	**4 831 loans valued at R2.67 billion**	–	
		Percentage of female mortgage holders for affordable homes	51%	**55%**	–	
		Estimated savings for homeowners through LookSee solutions and discounts on home loans in EDGE certified developments(cumulative lifetime savings)	R277 million	**R567 million**	R1 billion by end of 2025	•
	Business growth and job creation	Number of SMEs accessing lending and total value of loans, South Africa[2]	–	**8 065 SMEs R10.3 billion**	–	
		Number of SMEs accessing lending and total value of loans, Africa Regions		**12 000 SMEs R12 billion[3]**	–	
		Number of SME customers, South Africa	–	**503 090**	–	
		Number of SME customers, Africa Regions		**259 700**	–	
	ESG performance	ESG performance as measured by S&P CSA	67	**69**	70	•

• On track/met target • Below target

1 Estimated total project installed capacity (relating to ring-fenced project finance, excludes portfolio lending).
2 As per the IFC definition, businesses with <R300 million in turnover, loans <R40 million per deal.
3 R12 billion disbursed directly, R548 million disbursed through partners.

External measures of our performance

We track our scores on several external ESG indices, with a focus on the S&P corporate sustainability assessment (CSA), FTSE4Good, MSCI, CDP and Sustainalytics. Our performance has mostly shown steady improvement over the past six years. We aim to continue to improve as we further strengthen our disclosures.

		2019	2020	2021	2022	2023	2024		
ESG Performance Scores (higher is better)	S&P Global Sustainable1	51	60	61	66	67	**69**	▲	Sustainability Yearbook Member (2023 and 2024) Top 15% of global banks
	FTSE4Good	4.1	3.9	3.9	3.9	4.1	**3.8**	▼	Constituent company in the FTSE4Good Index Series, indicating strong ESG risk management practices
	MSCI	AA	AA	AA	AA	AA	**AA**	=	Industry leader
	CDP (Driving Sustainable Economies)	B-	C	C	C	C	**C**	=	In line with average for regional Africa score and Financial Sector score
ESG Risk Scores (lower is better)	Sustainalytics	29.9	25.5	25.6	24.7	18.4	**16.5**	▲	Industry rank: 1st (lowest risk) – 166 out of 1026

Engaging our stakeholders

Our stakeholders are those individuals, groups and organisations that materially affect or could be materially affected by our business activities, products, services and performance.

They provide us with the resources and capital we need to achieve our strategy and purpose, influence the environment in which we operate our business and confer legitimacy on our activities. They include our clients and partners, employees, regulators, shareholders, service providers and the communities in which we operate. Proactive engagement with our stakeholders provides us with insights that help shape our strategy, informs the identification of our material sustainability issues and enables us to manage and respond to stakeholder concerns and minimise reputational risk.

VALUE CREATED FOR STAKEHOLDERS IN 2024

Direct economic value generated	2023 Rbn	**2024 Rbn**
Economic value distributed:		
Paid to employees in salaries and other incentives	53.5	**54.5**
Paid to governments in tax	20.7	**21.6**
Paid in CSI funding	0.23	**0.26**
Inflows received from clients	164.5	**167.1**
Funds paid to suppliers and services providers	41.3	**40.7**
Dividends paid to shareholders	27.4	**28.3**
Economic value retained:		
Funds reinvested in SBG	21.6	**22.2**

Governance of stakeholder engagement

The SBG board is responsible for overseeing stakeholder relations and ensuring that the group responds appropriately to legitimate issues raised by our stakeholders. This responsibility is delegated to the GSESC. The committee receives a quarterly report identifying key issues and concerns raised by the group's internal and external stakeholders, and a quarterly report on risks and issues with the potential to impact the group's reputation and stakeholder relationships. Executive management provides information about how the group is responding to these issues and concerns and engaging with the relevant stakeholders. The committee is responsible for approving the group's material issues for external reporting purposes, taking stakeholder priorities into account. Members of the board, led by the chairman, also engage directly with stakeholders at the group's AGM and at events like investor days.

Stakeholder engagement principles

Stakeholder engagement is governed by our group stakeholder engagement principles. The principles provide a guideline for our operations across geographical areas, while recognising the need to accommodate local contexts. We developed the principles in consultation with our regional and country chief executive officers across Africa.

We are committed to:

- Responding appropriately to legitimate concerns
- Ensuring that our code of ethics and conduct and our values underpin and inform our engagements
- Constructive engagement, listening to concerns and suggestions with an open mind
- Being transparent in our engagements
- Being accessible.

How we engage

Executives and managers engage regularly with diverse stakeholders on relevant issues. They report material stakeholder priorities and concerns to relevant group and country committees. We have guidelines and policies in place to govern our engagements with specific groups of stakeholders. These ensure that group representatives have an appropriate mandate for engagement, and that potential conduct and reputational risks are managed. We assess the quality of our relationships and engagements with our stakeholders based on various relationship metrics which we track over time. We broadly consider these relationships to be of a good quality. Open and transparent two-way dialogue, in line with our engagement principles, is in place.

Stakeholder engagements in 2024

The activities and issues below informed our identification of our ESG risks and our potential impacts on the economy, society and the environment.

CLIENTS

(direct relationship)

Engagement mechanisms

Relationship managers, surveys exploring clients' priorities and expectations, online communication channels, call centres, social media, in-person and complaints channels.

Priority issues

- Service quality and responsiveness to queries and problems
- Ease of use of digital channels
- Value for money
- Solutions tailored to different customers' needs
- Customer education to address gaps (e.g. saving for education, saving for retirement and tax-free savings)
- Security of assets and data
- Sustainability solutions, including for supply chain.

Quality of relationship

CLIENT SATISFACTION SCORES

PPB
(out of 100)

SA **79**
2023: 77

AR **43**
2023: 37

BCB
(out of 100)

SA **61**
2023: 68

AR **23**
2023: 24

CIB
(out of 10)

8.4
2023: 8.3

IAM
(out of 100)

58

How we responded

- Further enhanced digital capabilities and mobile app functionality
- Actions underway to enhance responsiveness to customers, including quicker resolution of issues/ complaints and improvements to feedback and communication
- Ongoing investment in cybersecurity and anti-financial crime capabilities
- Ongoing expansion of sustainable finance offerings and employee capacity building on ESG, sustainability and climate risk.

EMPLOYEES

(direct relationship)

Engagement mechanisms

Employee surveys, including annual group-wide 'Are you a Fan' survey, online communication channels and in-person engagement

Trade union interactions include quarterly meetings as well as issue-specific engagements.

Priority issues

- Skills, employability, job security amid concerns about AI and digitisation
- Diversity and inclusion
- Employee wellbeing in context of rising cost of living, stress
- Labour unions in some countries seek wage increases well above inflation
- Concerns about whether we have a deep enough understanding of social and environmental impacts associated with our activities, missing opportunities and creating risks.

Quality of relationship

Employee net promoter score
(eNPS)

+48
2023: +48

African senior management
(South Africa) (%)

30✓
2023: 29

Women in executive and senior positions
(%)

42✓
2023: 41.5

Levels of voluntary turnover
(%)

4.5✓
2023: 5

How we responded

- We continue to make progress against our diversity targets, which inform our talent acquisition, training and development programmes
- We invested over R900 million in employee training
- We continue to invest in upskilling our employees in respect of sustainability, ESG and managing climate risk and opportunity
- Our annual employee engagement survey again demonstrated high levels of employee engagement and a strong connection with our purpose.

SHAREHOLDERS, INVESTORS
(direct relationship)

Engagement mechanisms

Investor, analyst and credit agency meetings, one-on-one engagements, conferences, roadshows, presentations, SENS announcements and AGMs.

Priority issues

- Board: skills gaps (climate and ESG), independence, gender diversity
- CEO succession planning
- Need for clearer ESG/climate linked KPIs and targets linked to executive remuneration
- Understand the need to balance emissions reduction with the need for social and economic development and access to energy but want to see progress on measuring financed emissions, decarbonisation targets, timelines and action plans.

Quality of relationship

SHAREHOLDER VALUE CREATED

ROE (%)	Revenue growth	Dividend payout ratio
18.5	2	56
2023: 18.8	2023: 21	2023: 55

Investor and other market participant feedback

Largely positive

AGM voting outcomes

No material concerns raised

ESG ratings

Scores generally up, with the exception of CDP which remains stable.

How we responded

- We are making progress on measuring our financed emissions across priority sectors and have published baseline financed emissions data for four sectors. We have set targets to reduce our financed emissions for upstream oil and gas. We will set targets for other sectors during 2025. We published an updated climate policy in March 2025.

SUPPLIERS AND SERVICE PROVIDERS
(direct relationship)

Engagement mechanisms

Partnerships, third-party risk assessments and re-assessments, third-party agreements and SLAs, regular meetings and performance management of critical third parties.

Priority issues

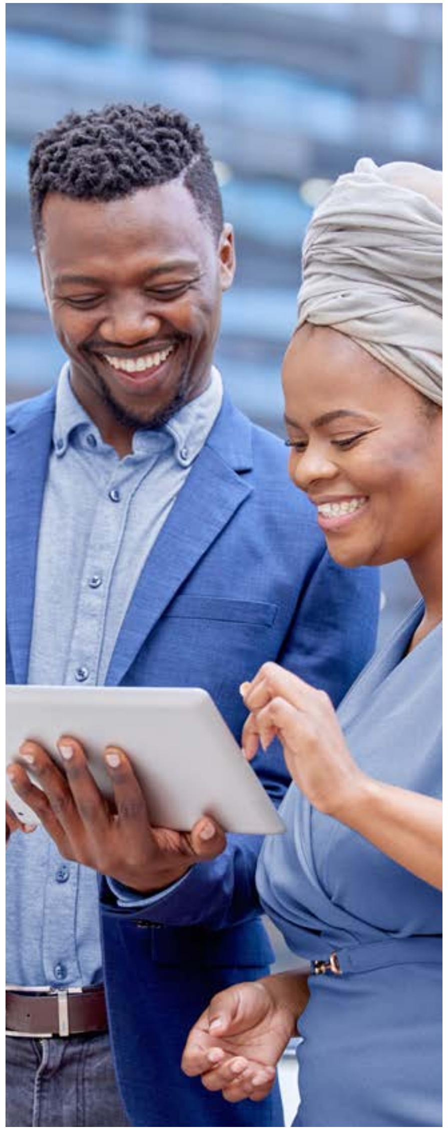
- Legislative compliance
- Information security and data protection
- Business continuity and operational resilience
- Cost saving and continuous improvement
- Environmental including carbon footprint, energy consumption, climate change, health and safety
- Social responsibilities such as human rights, labour practices, supplier development, ethics and conduct.

Quality of relationship

Performance against SLAs, regular two-way engagement

How we responded

- Centralised view of third-party landscape and associated risks (including third-party tiering)
- ESG risk management (geopolitical risk, conflicts of interest, anti-bribery and corruption, AML, sanctions control and continuous monitoring).



GOVERNMENTS AND REGULATORS
(direct relationship)

Engagement mechanisms

Regular engagements with regulators, engagement in policy making processes, involvement in government-business initiatives to address specific issues. Key issues are reported to the board via quarterly stakeholder engagement reports among other channels.

Priority issues

- Financial inclusion, including access to credit for SMEs and low-income customers, treatment of vulnerable customers and consumer protection
- Responsible AI
- Sustainable finance taxonomies
- Increased private sector participation in energy infrastructure development
- Operational risk, especially from use of third parties and cyber, data and technology risk, and systems stability and disruptions when new digital capabilities are deployed
- Business resilience, including in relation to climate risk
- Credit risk associated with sovereign risk, tough credit risk environment in most markets, credit concentration in some markets and the need for structural reforms to strengthen economic growth
- AML/CFT compliance and monitoring and addressing grey-listing
- Fraud and financial crime
- Skills development and capacity at country level
- Culture, conduct and governance, including conduct standard on consumer education.

Quality of relationship

Constructive engagements, good working relationship with key departments. Active participation in consultation processes, through trade associations and bilaterally.

How we responded

- Participated in FSCA engagements on proposed legislation to better protect vulnerable consumers
- Engaged with government stakeholders on development of South Africa's national AI policy framework
- Participated in consultation processes on the SA Green Finance Taxonomy
- Leading private sector funder of renewable energy projects:
- Participated in industry engagements with government on the maturing policy framework for climate, energy and environmental policy in South Africa, and worked with government to develop areas of collaboration for government and industry
- Continued participation on BASA credit risk task group and in quantitative impact study requests from the Basel Committee on Banking Supervision
- Hosted a BASA engagement session with the Prudential Authority on credit risk matters
- Hosted an FSCA engagement with industry stakeholders to identify industry level solutions for the protection of consumers against digital fraud
- Partnered with government stakeholders on initiatives to improve access to finance and business development support for SMEs
- Continued participation in trade association committees dedicated to improved market conduct.

CIVIL SOCIETY ORGANISATIONS, NGOS
(indirect relationship)

Engagement mechanisms

Issue-specific engagements, bilateral meetings, written correspondence, grievance channels. Key issues are reported to the board via the quarterly stakeholder engagement and reputation reports.

Priority issues

- SBG's role in efforts to address unemployment, poverty, inequality and financial inclusion, including for underserved communities and marginalised groups
- SBG's role in responding to climate change, including physical risks from climate events and transitional risks as the global economy shifts towards lower carbon solutions, and concerns about ongoing fossil fuel finance
- Concerns about specific projects, specifically Mozambique's LNG and EACOP and how these impact on local communities
- Data and cyber security and SBG's role in combatting financial crime
- Ethical practices, good governance, transparency and effective E&S risk management and mitigation.

Quality of relationship

Diverse stakeholder group, engagements often focus on a single issue, and the frequency of engagement and quality of relationships varies.

How we responded

- We continue to work closely with partners in government, business and civil society to identify and implement appropriate responses to boost inclusive economic growth and deepen financial inclusion
- Our E&S risk management system is robust and comprehensive, and aligned with international good practice. When stakeholders raise legitimate concerns regarding particular projects, we investigate allegations and engage with our clients to identify and address any concerns.

BANKING AND/OR INSURANCE ASSOCIATIONS AND BROADER BUSINESS ASSOCIATIONS (direct relationship)

Engagement mechanisms

Our memberships of industry associations and global forums enable us to contribute to public policy debates, support evidence-based policy making, contribute to processes such as the development of global standards and frameworks, and work collectively to enable positive impact.

Our trade association membership policy governs employee participation and accountabilities in such bodies.

We do not provide funding for lobbyists or for lobbying on specific issues. We pay membership fees, which are managed at country level.

This section provides a selected examples of our participation in relevant bodies, their positions on key issues, and alignment or otherwise with SBG's position in each case.

Priority issues

- Sustainable finance taxonomies, green finance mechanisms
- Solutions to address climate financing gap and support a just transition
- Solutions to manage nature-related dependencies and impacts
- Measures to prevent green-washing
- Appropriate disclosure frameworks and integration of reporting standards
- Strengthening AML controls and combatting financial crime
- Payment modernisation approach towards financial inclusion (South Africa).

INDUSTRY ASSOCIATION

Institute of International Finance

Annual membership fee
R4 million

SBG's role/position

Board member, member of several working groups including risk and methodologies, digital finance, crypto-assets

Action for SBG

Ensure emerging market considerations are included in the global debate. Consider opportunities on sustainable financing model development.

Key positions

Managing climate risk:
Supports urgent action to tackle climate change and the need for a just climate transition. Supports systemic reform to deliver a sustainable financial system but cautions against a prescriptive approach to regulatory action.

- Supports engagement by prudential authorities with financial sector stakeholders regarding treatment of climate-related risks in supervisory guidance and stresses the importance of flexibility and proportionality in any supervisory or regulatory approach to climate risk.
- Does not support additional prudential disclosure requirements.
- Questions the assumption that climate risks pose a 'near-term material threat' to financial stability.
- Cautions against overestimating of the role of financial institutions in supporting real economy decarbonisation.

Alignment with SBG position
Aligned

Nature and biodiversity:
Supports the development of common approaches across the financial sector to quantifying nature-related dependencies, impacts, risks and opportunities, but has concerns about:

- Availability of necessary location-level data and appropriateness of proposed metrics as a means of determining financial exposure to nature-related risks
- Appropriateness of global biodiversity goals and targets, which are oriented toward governments, as a basis for private sector strategies, particularly given that governments nature-related policies remain quite nascent
- The need to recognise financial institutions as enablers, rather than drivers, of sustainability-related economic transitions, with limited influence on real economy decision-making regarding nature-related priorities.

Alignment with SBG position
Aligned

ESG Disclosure:
Broadly supports global sustainability reporting standards developed by the ISSB, but has identified some concerns about specific quantitative and qualitative disclosure requirements.

Alignment with SBG position
Aligned

INDUSTRY ASSOCIATION

UN Environment Programme Finance Initiative (UNEP FI) and PRB

Annual membership fee
R700 000

SBG's role/position
PRB founding signatory, Co-Chair, UNEP FI Banking Board

Action for SBG
Oversee effective implementation of the principles, continue to participate in working groups and share learning and good practice. Continue to participate in PRB peer review process to inform and enhance sustainability reporting.

Key positions

Sustainable finance:
Focus is on building capacity among member banks and enabling dialogue and learning.

Alignment with SBG position
Aligned

Climate change:
Supports member banks to accelerate the transition to a low carbon economy, manage the risks and identify the opportunities linked to climate change. Acts as an interface between policy makers and the finance sector to help deliver the net-zero transition, fulfil the goals of the Paris Agreement, and build a low-carbon future.

Alignment with SBG position
Aligned

Nature and biodiversity:
Supports enhanced disclosure by financial institutions on their nature and biodiversity impacts and dependencies, guided by the TNFD recommendations. Facilitates working groups, peer learning forums and resources to support members on this journey.

Alignment with SBG position
Aligned

Just transition:
Supports the identification, prevention, and resolution of the potential adverse impacts of climate transition on relevant industry sectors, geographies and affected populations, together with efforts to optimise the positive social and economic impacts of climate transition by through strategic planning and operational changes within the banking and insurance industries. Calls for financial institutions to commit to supporting a just transition in their business operations and develop a practical plan to integrate and implement just transition principles into business operations.

Alignment with SBG position
Aligned

Equator Principles Association

Annual membership fee
R166 000

SBG's role/position
Member

Action for SBG
Continue to engage with the EP Association through working group participation and AGM attendance for training and knowledge transfer.

Key positions

E&S Risk:
Focus on integrating the EPs into the transactional process for E&S risk assessment in relevant projects, including climate change risk assessment and human rights risk assessment; engagement with IFC on Performance Standards updates and other international best practice on E&S risk tools and training programmes; working group on biodiversity.

Alignment with SBG position
Aligned

Industry Association continued

United Nations Principles for Responsible Investments (UN PRI)

Annual membership fee
R155 000

SBG's role/position
Liberty and Stanlib are members

Action for SBG
Ongoing active engagement and participation.

Key positions

Climate:
Supports strengthening and alignment of climate-related financial policy and regulatory standards and frameworks, including taxonomies and disclosure frameworks, the integration of transition planning into sustainable finance frameworks, support for NDC enhancement, implementation of the UNFCCC and G20/G7 commitments on the energy transition, integration of climate, nature, and resilience policies, and alignment of financial flows with net zero objectives.

Nature:
Supports the design and implementation of enabling policies for nature.

Human rights and social issues:
Supports improved understanding of the social impacts of the net-zero transition and the need for coordinated policy responses at national and multilateral levels.

Alignment with SBG position
Aligned

INDUSTRY ASSOCIATION – SOUTH AFRICA

Banking Association South Africa (BASA)

Annual membership fee
R35.8 million

SBG's role/position
Member

Action for SBG
Continue to actively engage in BASA committees and working groups.

Key positions

Climate:
Supports the SA NDC and the Just Energy Transition. Advocates for a comprehensive policy framework and roadmap for this transition, to ensure an orderly transition that maintains financial stability. Supports member banks' participation in SA's Renewable Independent Power Producer Programme.

Alignment with SBG position
Aligned

Artificial intelligence (AI)
Supports the Department of Communications and Digital Technologies' goal of promoting the responsible and ethical development, deployment, and use of AI across all sectors. Advocates for a risk-based categorisation system across industries to inform appropriate governance, ensuring that measures such as policies, regulations, codes and standards are proportionate to potential negative impacts while maximising societal benefits.

Alignment with SBG position
Aligned

AML:
Supports efforts to strengthen AML controls to meet FATF requirements; Supports institutions in implementing the remedial actions that have been provided to SA to be removed from the FATF greylist.

Alignment with SBG position
Aligned

Industry Association – South Africa continued

Association for Savings and Investment SA (ASISA)

Annual membership fee
R11.9 million

SBG's role/position
Member

Action for SBG
Create opportunities for trade association positions to be considered across banking and insurance, to ensure no unintended consequences are created from these positions.

Key positions

Climate:
Supportive of National Treasury's work on climate risk and financing a sustainable economy. Supports and provides input to the Presidential Climate Commission, and the Just Energy Transition Investment Plan. Has raised some concerns that the JET IP timeframe is not realistic and relies heavily on private sector investment.

Alignment with SBG position
No major divergences

Retirement legislation:
Supports enhancing the policy environment on social security. Has raised concerns that social security network policy positions are not adequately costed or integrated into a complete social security position, and that new taxes should not be discussed in a piecemeal basis.

Alignment with SBG position
Aligned

SA Banking Risk Information Centre (SABRIC)

Annual membership fee
R17.8 million

SBG's role/position
Member

Action for SBG
Continue to work with SABRIC to connect to other trade associations and departments dealing with financial crime, to align efforts and identify policy and regulatory gaps.

Key positions

Combatting financial crime:
Collaborates with the Department of Justice and Constitutional Development on initiatives to combat illicit activities and corruption, protect the financial and payments system and strengthen the criminal justice system for the benefit of the public. Includes a focus on capacitating the Justice College to ensure curriculum includes banking and payment systems, AML/CFT, cybercrime, forensic accounting, digital analysis and cryptocurrency.

Alignment with SBG position
Aligned and supports the FA Centre

Industry Association - South Africa continued

Business Unity South Africa

Annual membership fee
R862 500

SBG's role/position
Member

Action for SBG
Continue to participate in policy debates on climate policy, the just energy transition and economic development.

Key positions

Climate:
Advocates for predictable, grant-based, and concessional climate finance for developing countries, particularly South Africa. Emphasises the importance of private sector involvement in green investments and a just transition. Argues for fair financial support for adaptation and a flexible approach to the Just Transition that supports small businesses. Urges developed countries to avoid trade restrictions that could undermine developing nations' climate goals. Stresses the need for technology transfer and clear monitoring of South Africa's Nationally Determined Contributions (NDCs) implementation to ensure progress.

Alignment with SBG position
Aligned

Green Building Council of South Africa

SBG's role/position Founding Member

Action for SBG
Continue to participate actively and support advocacy for green buildings

Key positions

GBCSA provides green building certification and net zero building certification across Africa.

Presidential Climate Commission

Annual membership fee
N/A

SBG's role/position
SBSA CE is a member

Action for SBG
Continue to participate in engagements.

Key positions

Climate change:
Oversees country-level actions to reduce emissions while achieving a just transition to the green economy without leading to job losses.

Alignment with SBG position
Aligned

National Business Initiative (NBI) CEO Champions group

SBG's role/position
Member

Action for SBG
Continue to participate in discussion document development, skills development and economic development frameworks.

Annual membership fee R700 000

Key positions

Climate change:
Supports the need to reduce GHG emissions, recognises SA's vulnerability to climate change, supports implementation of SA's NDC commitments. Supports the need to economic health to managing climate change, and to mitigate barriers to the green economy. Argues for multi-stakeholder consultation as the basis for development of a just energy transition plan and climate finance solutions. Supports a project finance and economic principles framework to align economic and development policy.

Alignment with SBG position
Aligned

Carbon tax:
Supports carbon pricing as a meaningful measure to help transform economies toward a more climate neutral development path.

Alignment with SBG position
Aligned

Governance of sustainability

Our governance structures, at board and management level, ensure effective oversight of both pillars of our sustainability strategy. Our enterprise-wide risk management framework defines the structures and accountability for the oversight, governance and execution of ESG risk management. All identified material ESG risks are prioritised and monitored through quantitative or qualitative measures.

Board's role

SBG's board is responsible for guiding the group's strategy and overseeing our progress against our strategic priorities and related value drivers. This includes overseeing performance in relation to the two pillars of the group's sustainability approach, namely our impact on society, economies and the environment, and our management of ESG risk. Responsibilities are delegated to several board sub-committees.

- Committees meet quarterly and provide feedback to the full board.
- All committees are chaired by independent non-executive directors.

The board assesses it performance annually through various processes, including mandate self-reviews, effectiveness evaluations and one-on-one performance discussions with individual directors. Details on the board's effectiveness evaluation processes are included in the **Governance report**, together with a description of the composition of the board and its committees.

Board skills and training

Board awareness is continuously enhanced through the discussion of various agenda items, including **sustainability, climate risk and organisational resilience**, at board and board committee meetings. This ensures that board members are well-informed about key issues and developments impacting the group.

In March 2025, in partnership with the Gordon Institute of Business Science (GIBS), the board embarked on a 12-month programme focusing on climate-related matters, with a view to further strengthening the board's role in overseeing these issues in relation to SBG's strategy.

BOARD SUB-COMMITTEES

	Social, ethics and sustainability	Risk and capital management	Information technology	Remuneration
OVERSIGHT ROLE	▪ Oversees alignment between group strategy and social, economic and environmental impact, in line with UN PRB commitments ▪ Oversees implementation of group climate policy, monitors progress against climate commitments and targets and ensures alignment with group strategy ▪ Approves annual materiality assessment process and issues ▪ Approves metrics and targets related to sustainability impacts and risk management	▪ Monitors enterprise-wide risks, including ESG and climate risk ▪ Approves updates to E&S risk governance standard ▪ Monitors risks and opportunities associated with the operating environment ▪ Approves risk appetite and allocation of capital ▪ Monitors the effect of the macroeconomic and operating environment across jurisdictions on the group's risk profile	▪ Approves cyber resilience, technology governance, data and information capabilities, standards and frameworks	▪ Sets remuneration philosophy and policy statement to enable stakeholders to assess reward practices and governance processes ▪ Approves group remuneration report
RECEIVES UPDATES ON	▪ Progress against positive impact metrics and targets ▪ Progress against climate policy at sector and BU level ▪ Ethics and conduct dashboards ▪ Progress on diversity targets ▪ Key issues arising from stakeholder engagements and our response	▪ Management of climate risk at sector and BU level ▪ Progress towards developing appropriate methodologies and tools to assess and disclose financed emissions	▪ Progress of digital transformation and technology-related strategic initiatives ▪ Updates on system stability, technology-related security, risk management, costs, human capital and third-party management	▪ Shareholder feedback and recommendations on group remuneration policy and implementation ▪ Group and BU level performance against impact and ESG metrics
FOCUS AREAS IN 2024	Ethics and conduct, diversity and inclusion, climate risks and impacts	Integration of climate risk management into the enterprise-wide risk management framework, development of financed emissions baselines for priority sectors	Information security, cybersecurity, system resilience	Strengthening the link between performance on sustainability KPIs and remuneration

EXECUTIVE SUB-COMMITTEES

Business unit strategy and governance committees	Group Leadership Council (GLC)	Social, ethics and sustainability management committee	Group risk oversight committee (GROC)
▪ Chaired by business unit (BU) chief executives (CEs).	▪ Chaired by group CE ▪ Highest management structure ▪ Reports to SBG board ▪ Meets monthly	▪ Chaired by The Standard Bank South Africa Limited (SBSA) CE ▪ Reports to group social, ethics and sustainability committee (GSESC) ▪ Meets quarterly	▪ Chaired by group chief risk and corporate affairs officer ▪ Reports to group risk and capital management committee (GRCMC) ▪ Meets quarterly
ACCOUNTABILITY			
▪ Monitor progress against BU-level sustainability and ESG strategies, including positive impact and climate metrics and targets ▪ Ensure appropriate ESG risk management ▪ Provide quarterly progress reports to the GLC.	▪ Approves group policies and standards, including sustainability strategy, and monitors adherence ▪ Ensures appropriate governance structures, policies, processes are in place to identify and resolve risks, including ESG risks, and strengthen risk culture ▪ Drives business alignment with ESG risk management and ensures business ownership and accountability.	▪ Oversees group's social, economic and environmental impact, including climate-related impacts ▪ Oversees implementation of group climate policy ▪ Approves annual materiality assessment process and issues ▪ Approves metrics and targets related to sustainability impacts and risk management ▪ Ensures alignment with code of ethics and conduct, human rights statement, E&S risk management framework, climate policy and targets.	▪ Oversees ESG risk management through risk committees and mandated forums, including non-financial risk, information risk, climate risk ▪ Approves relevant risk governance policies ▪ Promotes risk management culture ▪ Reviews and recommends group risk appetite ▪ Ensures effective E&S risk management in line with group risk appetite ▪ Reviews results of client and transaction screening and due diligence to assess potential social/human rights and environmental impact ▪ Ensures climate-related risk identification, classification, analysis, monitoring and reporting is embedded in enterprise-wide risk management system, including client and transaction screening and due diligence.
HOW IT RECEIVES INFORMATION			
▪ Regular reports on progress against impact indicators and climate targets.	▪ Regular updates from business unit governance committees and risk and control committees ▪ Quarterly ethics and conduct dashboards ▪ Quarterly updates on progress against climate policy and targets.	▪ Receives quarterly reports on progress against the group's positive impact metrics and targets, and climate policy commitments and targets ▪ Monitors stakeholder issues and concerns based on group-wide input.	▪ Quarterly reports from group non-financial risk committee, Information risk steering committee, Climate risk committee ▪ Quarterly updates on management of climate risk at sector and BU level, and progress to develop appropriate methodologies and tools to assess and disclose financed emissions.

Embedding our sustainability approach across the group

Sustainability is integrated into the way we do business. Business units work closely with group functions, including risk, compliance and people and culture, and teams in our countries of operation, to ensure the group's sustainability strategy, key performance indicators and targets are embedded at all levels.

Group sustainability shapes the group's sustainability approach and key performance metrics, with oversight from GSESC. SBG's legal entities and BUs are responsible for taking ownership of and embedding the sustainability approach in their business areas. This includes:

- Ensuring all employees understand that achieving positive impact is a key driver of our business strategy and integral to our core business activities and how we measure our success
- Incorporating our positive impact areas into their business strategies
- Working with group sustainability to identify and track appropriate metrics to assess positive impact, and incorporating relevant metrics into team and employee KPIs
- Contributing to the group's positive impacts targets.

Sustainability and ESG risk management are embedded in our performance assessment and remuneration processes through our positive impact value driver.

We measure our performance against our six value drivers: client focus, employee engagement, risk and conduct, operational excellence, financial outcomes, and positive impact. The performance of every Standard Banker, from group executives to frontline staff, is assessed against clearly defined KPIs in relation to all six value drivers. This ensures a comprehensive view of performance that goes well beyond financial results.

The achievement of metrics and targets related to the group's positive impact value driver is considered in relation to short-term and long-term incentive outcomes for senior managers and executives.

- The group short-term incentive pool, from which cash and deferred incentive awards are funded, is determined based on performance across the six value drivers, including positive impact.
- At an individual level, the short-term incentive awards for executive directors, prescribed officers and other senior executives are based on performance scorecards covering group and BU performance measured against annual targets under each of the six value drivers, including positive impact.
- All employees who receive an annual short-term incentive above a set threshold are required to defer a portion of their incentive over 18 to 42 months.
- Key roles at managerial level and above qualify for discretionary deferred incentive awards. Both mandatory and discretionary deferred awards are in the form of restricted share units.
- 30% of the conditional long-term incentive awards awarded to executive directors, prescribed officers and other senior executives are linked to the achievement of targets related to our five non-financial value drivers, including positive impact. These targets are measured over a three-year performance period.

Integration of ESG risk management in the enterprise-wide risk management systems

SBG's **three lines of defence** model sets out the responsibilities of individuals and teams to ensure that risks are adequately considered and managed.

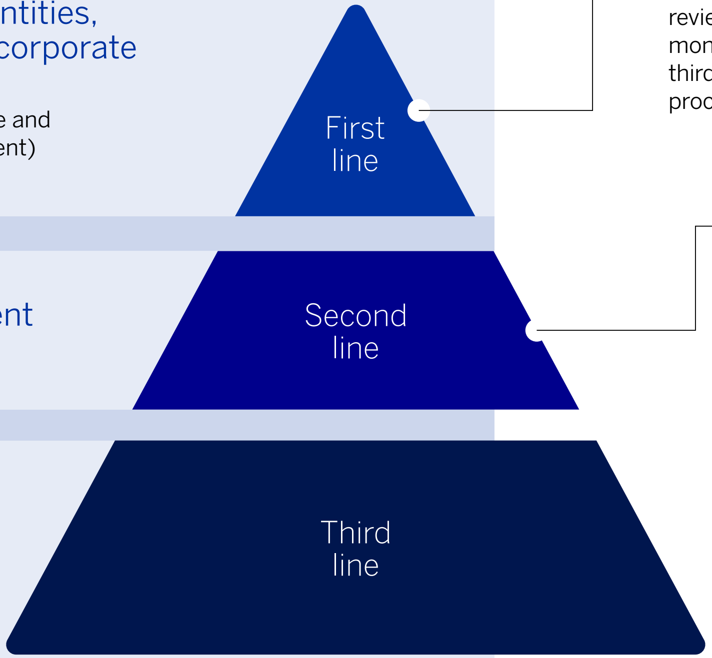
Heads of legal entities, business units, corporate functions

(including legal, people and culture and procurement)

Risk management functions

Internal audit

Undertake risk-based and general audits to provide assurance to the board that the overall governance framework, including the risk governance framework, is effective and that policies and processes are in place and consistently applied.



First line

- Promote a culture in which all employees take accountability for ESG risk management and understand and comply with requirements
- Integrate ESG risk management, including climate risk, in enterprise-wide systems and frameworks, including client onboarding and review, transaction screening and monitoring, portfolio management, third-party risk management and procurement.
- Assess, manage, control and report ESG risk and ensure risk is within appetite
- Prepare conduct dashboards
- Implement climate commitments and targets
- Partner with clients to develop solutions that promote sustainability
- Support clients to mitigate and adapt to climate-related risk
- Deliver group sustainable finance targets.

E&S risk teams in business units

- Execute the E&S risk governance standard and policy and monitor compliance across the group, to ensure E&S risks are correctly identified, evaluated and managed at transactional level
- Ensure alignment with international standards such as the Equator Principles, and compliance with SBG's climate policy
- Review all project-related transactions and medium and high-risk non-project related transactions to identify, screen and manage E&S impacts associated with the group's lending activities
- Work with business and credit teams to assess and mitigate risks.

Second line

- Identify, measure, monitor and report risk on an enterprise-wide basis, independently from the first line.

Group chief risk and corporate affairs officer

- Accountable for the management of ESG risks and opportunities, including climate
- Reports to the board and GRCMC.

Sub-committees of the GROC

Oversee implementation of the ESG risk governance framework

- Portfolio risk management committee: oversees credit exposure at sector and country level
- Group non-financial risk committee: oversees non-financial risks and governance, including risks associated with ESG and climate
- Group compliance committee: promotes a compliance culture and ensures the effective management of compliance risk across the group.

Group sustainability

- Monitors and reports on conduct dashboards
- Supports the integration of ESG risk management across the group
- Responsible for ESG performance disclosures
- Supports the implementation of the group climate policy
- Coordinates progress reporting against the climate targets
- Reports to the group chief risk & corporate affairs officer.

Client risk committees

- Assess issues related to ESG, ethics and conduct in relation to onboarding new clients, new client mandates, and existing client relationships, including ESG risk level, conflicts of interest, anti-competitive behaviour, financial crime, sanctions, anti-money laundering (AML)/counter-terrorist financing (CTF), bribery and corruption and fraud risk.

Supplier risk committees

- Review issues related to ESG, ethics and conduct in relation to suppliers and third parties, including conflicts of interest, anti-competitive behaviour, human rights, conduct and environmental impacts.

2

MAXIMISING POSITIVE IMPACT AND MITIGATING NEGATIVE IMPACT

Sustainable finance

One of the ways in which we achieve positive impact is by partnering with our clients to enable them to achieve their sustainability goals, transition to a lower carbon economy and enable climate change mitigation and resilience. We are a leader in developing sustainable finance markets in Africa. We also partner our strategic funding team to facilitate finance for SBG and its subsidiaries in sustainable format, to support the delivery of positive environmental and social impact.

Governance and frameworks

Our Sustainable Finance frameworks ensure consistency, transparency and credibility in reporting on progress against our sustainable finance targets.

Sustainable Finance Framework (SFF)	▪ Published in October 2023 ▪ Applicable to treasury transactions across SBG ▪ Outlines the methodology and associated policies and procedures to facilitate the raising of finance in sustainable format, including green, social and sustainable bonds or loans (including hybrid instruments), repurchase agreements and securitisation instruments by the group ▪ Describes the process to select, evaluate, report, track and verify eligible assets, and how the proceeds of the bonds or loans are managed and allocated ▪ Sustainalytics has provided a Second-Party Opinion (SPO) confirming that the framework is credible and impactful and aligns with the Sustainability Bond Guidelines 2021, Green Bond Principles 2021, Social Bond Principles 2023, Green Loan Principles 2023 and Social Loan Principles 2023.
Sustainable Finance Product Framework (SFPF)	▪ Internal CIB framework to facilitate tracking progress against our group sustainable finance mobilisation targets ▪ The Green and Social eligibility criteria align fully with the SFF ▪ The sustainability-linked criteria align with Sustainability-Linked Loan Principles (SLLPs) and Sustainability-Linked Bond Principles (SLBPs) ▪ The framework provides criteria for pure play assets where the use of proceeds is not specific but classification as a sustainable finance asset is based on the company profile ▪ Transition categories have been reviewed by an independent external consultant.
Sustainable Finance Governance Framework (SFGF)	▪ Internal CIB framework to facilitate tracking progress against our group sustainable finance mobilisation targets ▪ Documents the governance process required to execute on sustainable finance transactions that count towards our targets.

POSITIVE IMPACT VALUE DRIVER

Group Sustainable Finance Mobilisation Targets (2022 to 2028)

We have reviewed and updated our group sustainable finance targets, extending the target period to 2028 and increasing the level of ambition. We target a cumulative amount of >R450 billion in sustainable finance mobilisation between 2022 and 2028 (previously >R250 billion between 2022 and 2026), including new sub-targets for green finance (R100 billion) and social finance (R100 billion) between 2025 and 2028.

Sustainable Finance Product Framework (SFPF)

Sustainable Finance Governance Framework (SFGF)

Use of proceeds categories considered in our various sustainable finance frameworks:

Social

- Affordable housing
- Access to essential services
- Affordable basic infrastructure
- Employment generation and programmes designed to prevent and/or alleviate unemployment stemming from socioeconomic crises, including through the potential effect of SME financing and microfinance
- Food security and sustainable food systems
- Socioeconomic advancement and empowerment.

Green

- Renewable energy
- Electricity distribution networks
- Energy efficiency
- Pollution prevention and control
- Climate change adaptation
- Green building
- Clean transportation
- Sustainable management of natural resources
- Terrestrial and aquatic biodiversity conservation
- Sustainable water
- Circular economy
- Blue finance
- Carbon financing.

Transition

Transition eligible categories include but are not limited to the following sectors/activities:

- Energy
- Infrastructure
- Cement
- Chemicals
- Metals
- CCUS
- Blue Hydrogen
- Transportation.

Client engagement

Client engagement is central to executing our sustainable finance strategy. We achieve our sustainable finance targets by actively collaborating with our clients and partnering with our product and coverage teams. This enables us to gain a deep understanding of our clients' sustainability goals, ESG risks and key focus areas. By aligning our financing solutions with our clients' sustainability strategies, we help drive progress on their sustainability ambitions while contributing to the broader goals of the group.

In 2024, we focused on deepening and embedding sustainability skills in our client-facing teams to support client engagements on this important topic. 2024 also saw an increased focus on engaging clients in carbon intensive sectors around their transition strategies.

We continue to integrate sustainability across our business, with a primary focus on lending activities in both loan markets and debt capital markets (including securitisation).

We provide sustainable advisory services through engaging our clients to understand their sustainability strategy and advise on appropriate sustainable finance solutions, including advising on development of sustainable finance frameworks.

Sustainable finance products and performance

In 2022, we set a target to mobilise over R250 billion in sustainable finance format by 2026. We committed to review our cumulative targets every three years. We have continued to integrate sustainable finance across the group and have improved related processes and reporting. This has enabled us to identify additional eligible asset portfolios for consideration as sustainable finance. As a result of these improvements, we have developed an updated group sustainable finance mobilisation target of >R450 billion, for an extended period of 2022 to 2028. We have also set new sub-targets for green finance (R100 billion) and social finance (R100 billion) mobilisation between 2025 and 2028.

Decarbonisation and a just energy transition

In 2022, Africa was responsible for just 3.7% of global energy-related carbon emissions[1]. However, Africa's share of global CO_2 emissions could rise to 20% by 2100[2], even with moderate economic and population growth. We have therefore developed a list of **decarbonisation activities** that support the climate and transition strategies of our clients in hard to abate sectors, such as oil and gas, mining, cement and shipping.

This list of activities supports our view that gas plays an important role as a transition fuel with an emissions factor lower than other fossil fuels. The list includes natural gas production and the distribution and storage of natural gas, which will play an important role in reducing emissions, alongside an accelerated rollout of renewable energy.

While we will continue to support our clients by mobilising finance towards decarbonisation activities, only a narrow subset of these activities will be eligible to count towards our group sustainable finance targets. We have worked with an independent consultant to identify a list of eligible transition finance activities that complement our green and social eligibility criteria and will be eligible to count towards our sustainable finance mobilisation targets.

We intend to incorporate transition eligible activities into our group sustainable finance framework during 2025.

1 IEA, 'Africa', https://www.iea.org/regions/africa
2 Wang, J. et al. (2024), "Investigating the fast energy-related carbon emissions growth in African countries and its drivers", Applied Energy, https://www.sciencedirect.com/science/article/pii/S0306261923018585?via%3Dihub

SUSTAINABLE FINANCE METRICS

	2023 Rbn	2024 Rbn
Sustainable finance mobilisation (cumulative since 2022)	103.1[1]	**177.4✓**
Sustainable finance mobilisation target (cumulative)	90	**145**
Target met	Yes	**Yes**
Annual sustainable finance mobilisation (A+B)	50.6	**74.3✓**
Mobilisation – Use of proceeds (A)	26.4	**45.6**
Green	21.3	**22.5**
Social	4.4	**17.2**
Other[2]	0.7	**6.0**
Mobilisation – General purpose (B)[3]	24.2	**28.7**
Sustainable finance mobilisation by region[4]:	50.6	**74.3✓**
South Africa	35.3	**62.3**
Africa Regions	15.3	**12.0**

1 2023 cumulative mobilisation includes a (R2 billion) downward adjustment due to improved data governance.
2 Other may include sustainable (green and social) and transition use of proceeds.
3 Financing and arranging for general corporate purposes with sustainability indicators and targets. May include sustainability-linked, transition and pure play (corporate funding for organisations deriving ≥ 90% revenue/EBITDA from eligible green/social activities).
4 CIB represents 88% of sustainable finance mobilisation (2024). CIB exposures in sustainable format represent 10% of gross loans and advances in CIB (2023: 6%). Sustainable finance mobilisation includes R3.6 billion in bond format (2023: R2.6 billion).

SUSTAINABLE FINANCE SUB-METRICS

	2023 Rbn	2024 Rbn
Renewable energy financing[5]	15.5	**19.8✓**
Renewable energy financing cumulative since 2022[6]	33.6	**53.4✓**
Social projects financing[7]	4.2	**16.5✓**

5 Financing of new renewable energy power plants , excluding bonds arranged.
6 Cumulative target 2022 to 2024: R65 billion (R50 billion financing plus a further R15 billion underwrite).
7 Financing of social projects, excluding bonds arranged. Annual target 2024: R7.5 billion.

TREASURY TRANSACTIONS[8]

	2023 Rbn	2024 Rbn
Use of proceeds (green, social, sustainable)	6.7	**11.9**
General purpose (sustainability-linked)	9.9	**0.0**
Total quantum treasury transactions	16.6	**11.9**

8 Treasury transactions are not included in sustainable finance mobilisation.

TREASURY-RELATED IMPACT AND ALLOCATION REPORT[1]

Green issuances

Issuance date	Maturity date	Issuer	Instrument	Green category	Instrument value (ZAR equivalent)	Allocations	Number of assets	Installed capacity (MW)	Estimated avoided CO_2 emissions avoided by the project (Tonnes CO_2/annum)
2020/02/02	2030/02/26	SBG	Green Bond - private placement	Renewable Energy	3 294 000 000	100%✓	5	358	903 000
2021/12/07	2026/12/08	SBG	Tier 2 Green Bond SST201	Renewable Energy	1 444 000 000	100%✓	2	580	984 250
2022/08/30	2027/08/31	SBG	Tier 2 Green Bond SST202	Renewable Energy	1 639 000 000	100%✓	1		
2023/03/02	2028/03/03	SBG	Tier 2 Green Bond SST203	Renewable Energy	2 000 000 000	100%✓	1		
2022/07/05	2025/07/05	SBG Namibia	Senior Unsecured Green Bond SBNG25	Renewable Energy	200 000 000	9%[2]✓	1	3	2 400
2022/07/05	2027/07/05	SBG Namibia	Senior Unsecured Green Bond SBNG27	Renewable Energy	200 000 000				
2024/05/23	2029/06/30	SBG	Tier 2 Green Bond SST204	Green Assets	1 512 000 000	100%✓	2	182	488 580

Social issuances

Issuance date	Maturity date	Issuer	Instrument	Social category	Instrument value (ZAR equivalent)	Allocation	Number of homeloans	Number of women borrowers	Percentage women borrowers by quantum
2021/08/19	2026/08/19	SBSA	Senior unsecured Social Bond SBSS02	Affordable Housing	1 074 000 000	100%✓	2 793	1 736	61%
2021/12/09	2026/08/19	SBSA	Senior unsecured Social Bond SBSS02	Affordable Housing	750 000 000	100%✓			
2024/12/10	2029/12/10	SBG	Tier 2 Social Bond SST205	MSME finance and Personal/Consumer Finance	3 600 000 000	0%[3]✓	n/a	n/a	n/a

1 Impact and allocation reporting in relation to private transactions are disclosed in line with relevant legal documentation.

2 Various renewable energy projects intended for allocation to the SBN green bond have not proceeded at our clients' discretion. Some projects have experienced market-related and regulatory-related delays, and remain in our 2025 pipeline. We will continue to provide investors with updated allocation reporting annually in our Sustainability Disclosure Report. Unallocated proceeds are invested in the bank's treasury liquidity portfolio, in cash or other short term and liquid instruments in line with the relevant Sustainable Bond Framework .

3 To be allocated in 2025. Unallocated proceeds are invested in the bank's treasury liquidity portfolio, in cash or other short term and liquid instruments in line with the relevant Sustainable Bond Framework.

EXAMPLES OF SUSTAINABLE FINANCE DEALS IN 2024

Sustainability-linked finance

Sustainability-linked finance	Impact
Old Mutual sustainability-linked multi-currency facilities Sole Mandated Lead Arranger, Bookrunner, Lender and Sustainability Coordinator for a R5.25 billion term debt package, delivering an impactful financial solution across three African markets. The deal supports positive E&S outcomes.	▪ The sustainability-linked solution incorporates both environmentally and socially focused KPIs, including renewable energy capacity and diversity and inclusion.
PepsiCo South Africa sustainability-linked R1.4 billion working capital facility Lender and Sustainability Coordinator in the transaction, supporting the company's renewable energy commitments and their broader localisation aspirations in relation to their procurement spend in SA.	▪ Aligns with the company's commitment to sustainability through its PepsiCo Positive agenda, which drives positive environmental impact through the greater use of renewable electricity in its manufacturing operations ▪ Focuses on driving the broader localisation of their value chain by increasing the participation of local suppliers.
Oceana sustainability-linked term debt refinance Mandated Lead Arranger and Sustainability Coordinator for a R1.6 billion sustainability-linked financing solution to support Oceana's strategic growth objectives.	▪ KPIs embedded in the sustainability-linked financing focus on decarbonisation through increased renewable energy capacity and health and safety in the form of improved injury frequency rates.
Shoprite sustainability-linked loan refinance Lender and Sustainability Coordinator for a R2 billion sustainability-linked loan incorporating updated KPIs and sustainability performance targets linked to Shoprite's sustainable energy, packaging and recycling goals.	▪ KPIs include increased renewable energy use, recycled content in packaging, recyclable, compostable and reusable packaging, and plastic and cardboard recycled.
Motus sustainability-linked loan Joint Mandated Lead Arranger, Sustainability Coordinator and Bookrunner on a GBP150 million multi-currency syndicated sustainability-linked loan focusing on both social and environmental KPIs.	▪ Social KPIs include female representation in management and contribution to improving access to quality education in South Africa. ▪ Environmental KPIs include electricity intensity and fuel intensity, two of Motus' material impact areas.

Green finance

Green finance	Impact
AMEA Power green loan for a renewable energy project Mandated Lead Arranger for a R2 billion green loan to finance the 120MW Doornhoek Solar Photovoltaic (PV) project in the North West Province.	▪ Expected to generate more than 325GWh of clean energy per year which is estimated to power 97 000 households and offset 330 000 tonnes of carbon emissions annually.
The African Stove Company (TASC) carbon credit project Financed the first carbon credit financing transaction in 2023 and provided additional debt funding in 2024 to enable TASC's expansion in sub-Saharan Africa. TASC has distributed one million fuel-efficient cookstoves across sub-Saharan Africa and financed 30 000 household water filters in Uganda. TASC has rolled out cookstoves to almost 763 700 households in rural communities in South Africa as at the end of 2024, making this the largest carbon credit project in South Africa.	▪ The cookstoves require approximately 70% less wood for fuel, thereby reducing GHG emissions, household pollution and deforestation. ▪ Rural communities spend less time and money sourcing wood, and experience significant health and safety benefits from cooking on improved cookstoves.
Resilient green loan Sole Funder and Sustainability Coordinator, assisted local retail-focused real estate investment trust (REIT) in raising their first green loan worth R700 million, which is intended to fund the installation of solar panels and the related infrastructure in Resilient's various shopping centres.	▪ Promotes sustainable energy sources ▪ Ensures uninterrupted trading during periods of loadshedding.

Examples of sustainable finance deals in 2024 continued

Social finance	Impact
Support for TUHF's new Urban Ubombi 2 securitisation structure Successfully brought a new securitisation structure to the debt capital markets through its inaugural private placement issuance, listed in the sustainability segment of the JSE as social bonds.	▪ Focus on urban regeneration and socioeconomic development in South Africa's under-serviced cities.
Leading role as financier to the first Battery Energy Storage Systems (BESS) projects Sole Mandated Lead Arranger and underwriter of the debt for the Mogobe BESS facility totalling 103MW/412MWh in the Northern Cape and co-mandated Lead Arranger for three Oasis 1 BESS projects with a combined capacity of 257MW/SDG's 1028MWh located in the Northern Cape. Financed R9 billion for these projects under the first bid window of the Battery Energy Storage Independent Power Producer Procurement Programme (BESIPPPP) in South Africa.	▪ BESS stabilises the SA grid by storing excess electricity during low demand periods and releasing it during peak demand, effectively mitigating load shedding and enhancing grid reliability ▪ Increases SA's integration of variable renewable energy sources like solar and wind.
BizFlex BizFlex is a digital, short-term unsecured lending solution designed for micro, small and medium enterprises (MSMEs). It features a unique 'pay as you earn' repayment structure, enabling clients to repay the loan as and when they earn revenue into their business current account, ensuring repayments are in sync with their cash flow. The total cost of the loan is stated upfront and remains fixed, providing clients with complete cost certainty.	▪ Since its launch in 2019, BizFlex has disbursed R7.5 billion to over 12 700 South African businesses ▪ In 2024, R1.8 billion was disbursed. Over 35% of these businesses had boards comprised of at least 30% women.
SBSA affordable housing home loans SBSA's affordable housing loan book comprises 95 654 loans valued at R33.2 billion. In 2024, we provided R2.7 billion in home loans to 4 831 new customers, of whom 55% were female.	▪ Improved access to affordable housing for low- and middle-income households that earn above the qualifying threshold to receive state subsidised housing (>R3 500 per month) but below the qualifying threshold to secure a home loan <R29 600 per month).

Social finance	Impact
Trans-Caledon Tunnel Authority R3.25 billion sustainable loan for the implementation of the Mokolo Crocodile River Water Augmentation Project Phase 2A (MCWAP-2A).	▪ Transportation of water from the Crocodile River to the water-scarce Lephalale to augment water supply. Assists in addressing increasing municipal water demands due to population growth and industrial development in the overall Waterberg ▪ Creates an enabling environment for economic growth in the area to support job creation, socioeconomic and industrial development.
Acre Impact Capital's market first debt fund to support sustainable infrastructure Committed USD15 million to Acre Impact Capital's Export Finance Fund I to support the financing of sustainable infrastructure projects in Africa.	▪ Unlocks various bankable projects to provide much-needed essential, climate-aligned infrastructure to African countries ▪ The fund's target size of USD300 million will mobilise a total of USD1.7 billion of private capital to deliver impact SBGs-aligned projects in Africa.
Transition enabling finance	
Seriti Green's 155MW renewable energy wind project in Mpumalanga Joint Mandated Lead Arranger in the transaction, committing project finance debt and equity into developing the 155MW as the initial phase of Seriti's greater 900MW Ummbila Emoyeni project. The wind farm will translate into a significant investment in the province along with the creation of jobs, procurement opportunities and social investment expenditure.	▪ Project is recognised as a strategic infrastructure project, championing the energy transition in the region ▪ The first phase is expected to generate up to 800 jobs and supply electricity to Seriti Resources under a power purchase agreement signed in 2024, supporting the decarbonisation of the company's operations.
TotalEnergies, Mulilo and Reatile Group renewable energy Provided R3 billion transition finance for two key renewable energy projects for the long-term supply of 260MW of renewable power from a 140MW wind facility and a 120MW solar facility, near De Aar in the Northern Cape. The renewable power will be supplied to Sasol's Secunda site in Mpumalanga, where Air Liquide operates the biggest oxygen production site in the world.	▪ The renewable energy projects will have a direct impact on the local community through job creation while also contributing to South Africa's energy transition by increasing its share of renewables as an alternative to coal-fired power ▪ The plants will reduce the Secunda complex's carbon emissions facilitating its efforts to decarbonise.

Examples of sustainable finance deals in 2024 continued

Treasury	Impact
IFC's sustainable loan to SBSA IFC provided a USD300 million sustainable Tier 2 loan to SBG to support the continued financing of renewable energy projects and homeloans in the affordable housing sector in South Africa, with an emphasis on women borrowers.	▪ Funds will be allocated to utility-scale renewable energy projects, which contribute to energy security in SA, and housing homeloan origination, which will contribute to financial inclusion in SA.
SBG R1.5 billion Green Tier II Bond Listed on the JSE Sustainability segment, supporting the financing of renewable energy assets financing of eligible green assets aligned with the SBG Sustainable Finance Framework.	▪ Supports eligible green categories included in the SFF.
AfDB private placement R3.6 billion AfDB social bond private placement. Bond proceeds will be used to support MSME lending in South Africa under SBG's Sustainable Finance Framework.	▪ Drives sustainable economic growth in Africa by supporting SMEs and fostering inclusive financial solutions.

2024 awards

African Banker
- Sustainable Bank of the Year

EMEA Finance African Banking Awards
- Best Pan-African Green Finance Bank

EMEA Achievement Awards
- Best Green Bond House
- Best Green Bond (CRDB Bank USD68 million Green Bond – the first green bond issuance in Tanzania)

EMEA Project Finance
- Best renewable energy deal (Red Rocket South Africa Wolf, Rietkloof and Brandvalley Wind Farms)
- Most innovative project finance deal – Scatec's synthetic CPI-linked loan for 225MW solar power plants

Euromoney Awards of Excellence
- South Africa's Best Bank for ESG

Bonds and Loans Africa Awards
- Natural Resources Deal of the Year TASC ZAR194 million Green Loan

Global Finance Sustainable Finance Awards
- Best Bank for Sustainable Infrastructure Finance in Africa
- Best Bank for ESG-Related Loans in Africa
- Best Bank for Sustainable Project Finance in Africa
- Outstanding Leadership in ESG-Related Loans
- Outstanding Leadership Transition/Sustainability Linked Loans

2025 awards

Global Finance Sustainable Finance Awards
- Best Bank for Sustainable Finance in Africa
- Best Bank for ESG-Related Loans
- Best Bank for Transition/Sustainability Linked Loans

SUSTAINABLE INVESTING

Our Insurance and Asset Management (IAM) business unit includes Liberty, STANLIB, short-term insurance business Standard Insurance, boutique investor Melville Douglas,[1] the Liberty Two Degrees property portfolio, and insurance and investment operations in Africa Regions. Our purpose is to grow and protect what matters most.

- **Liberty Holdings Limited** is part of the Standard Bank Group, providing services including long-term and short-term insurance, investment, asset management and health services, to help clients build and protect their wealth and lifestyle.
- **Melville Douglas** is a boutique investment management company within SBG. It manages investments on behalf of individuals, families and a wide range of endowments, charitable trusts, retirement funds and institutional clients. It has its own board.

We believe that consideration of sustainability in investment decisions is essential to value creation, capital protection and property assets. We incorporate relevant and material ESG issues that can meaningfully affect investment performance in our research, decision-making, reporting and ongoing monitoring processes. This enables us to better identify investments that will provide sustainable and superior risk-adjusted returns.

Liberty's investment teams outsource the asset management function to third-party asset managers, the majority of which is managed by **STANLIB**, a subsidiary of the group. STANLIB treats ESG as a material consideration in delivering risk adjusted returns to clients. As active owners, they aim to influence corporates and entities they invest in to incorporate ESG factors.

Liberty and STANLIB are signatories to the UN Principles for Responsible Investment (PRI). They respond annually to the PRI Transparency Report. They comply with the Principles of the second Code for Responsible Investing in South Africa (CRISA 2) and other responsible investment focused policies and legislation in South Africa[2].

1 Melville Douglas is a boutique investment management company within SBG. It manages investments on behalf of individuals, families and a wide range of endowments, charitable trusts, retirement funds and institutional clients. It has its own board and ESG policy.

2 Including Regulation 28 of the Pension Funds Act, the Financial Sector Charter (FSC) and King IV (principle 17).

Governance

Liberty's client experience and fairness committee is responsible for approving and monitoring the implementation of our ESG policy. Investor teams report to the committee on their evolving ESG approaches. The Liberty portfolio oversight committee is responsible for exercising oversight over how policyholder portfolios are mandated, constructed and delivered against investment objectives. Liberty's business units are required to implement policies, standards and controls to ensure that investment activities are undertaken in accordance with the principles set out in the policy. As an active asset owner, we can influence corporates and entities to incorporate ESG factors, thereby promoting sustainable businesses. Our policy commits us to:

- Promote integration of ESG factors into the investment process
- Actively engage in considering ESG factors
- Exercise ownership rights
- Collaborate to drive desired outcomes
- Communicate our responsible investing activities
- Apply ESG oversight to our investment capabilities.

Sustainable investing policy

Our investment activities and criteria are governed by our responsible investment policy. This forms part of our overall risk management framework and specifies a set of principles employed across investment activities to ensure protection of all stakeholder interests. This applies to our externally managed assets. ESG considerations are included in due diligence and scoring of managers. This does not apply for passive investments.

Our responsible investment policy aims to ensure:

- Integration of material ESG criteria into investment decisions with the objective of improving the long-term sustainable financial outcomes of clients' portfolios
- Consideration of ESG criteria is integrated across all active portfolios (public and private markets) and seeks to enhance risk-adjusted returns
- Related material ESG investment risks and opportunities are addressed in a consistent manner through clear identification, measurement, management, reporting and ongoing monitoring across investment management processes
- Principles of good corporate governance are applied in the investment decision-making process
- Compliance with relevant legislation and adoption of best practice voluntary standards
- Ethical investing allowing for the exclusion of certain stocks or industries, in line with Liberty's code of ethics
- Sustainable and impactful investing through comprehensive assessment and valuation of companies or industries, incorporating ESG risks and opportunities, where applicable
- Promotion of ESG risk management practices within companies and managers through active engagement, where feasible.

Each STANLIB investment team adopts their own detailed methodology to integrate ESG into their investment process. STANLIB also has an ESG/ Responsible Investing Committee that has overall oversight, and to ensure consistency across assets.

- The STANLIB Multi-Manager team incorporates ESG factors into manager research, operational due-diligence processes and portfolio management, as per the STANLIB Multi-Manager ESG Policy.
- The STANLIB Credit Alternatives team incorporates ESG factors into assessment of suitability, as per the STANLIB Credit Alternatives ESG Policy.

Sustainable stewardship

We mandate our managers to vote on our behalf, without any exclusions on matters to be voted on for E, S or G. Our stewardship policy is currently focused on governance and does not currently include engagement guidelines for climate change, biodiversity or social issues. Engagement outcomes are reported in the stewardship reports produced by our managers, such as STANLIB

Managing environmental and social risk

Economic growth and large-scale infrastructure development create social benefits, including new opportunities for trade and business growth, employment opportunities, and improved access to basic services such as electricity, water, sanitation, public health and education.

They may also have negative environmental impacts. Land may need to be cleared for development, local water sources may be put under pressure, and construction may create air and noise pollution. At all times, we commit to undertaking a thorough assessment of the social and environmental costs and benefits associated with our business activities, and ensuring we do all we can to maximise benefit and mitigate harm. We manage ESG risk through our environmental and social management system (ESMS), which forms part of our enterprise-wide risk management framework. Transactional and client-related E&S risk is governed by our E&S governance standard and E&S risk policy.

Environmental and social risk management

E&S risk refers to the risk of adverse impact on people and the natural environment arising from our business activities. Such impacts may arise from our direct business activities, or from the activities of the clients or projects we finance. They may impact our employees, our clients, the individuals and enterprises in our supply chain, and the communities impacted directly or indirectly by our business activities. E&S risk creates potential credit risk, operational risk, business risk and reputational risk.

Our E&S standard and policy support compliance with regulatory requirements in our countries of operation, and our obligations under various global frameworks. These include:

- The Equator Principles (Standard Bank is an Equator Principles Financial Institution)
- The IFC Performance Standards on Environmental and Social Sustainability
- The Principles for Responsible Banking (PRB)
- The Principles for Responsible Investing (PRI)
- Commitments to limit GHG emissions in line with the Paris Agreement
- The UN Guiding Principles on Business and Human Rights.

The ESMS is supported by our internal policies and processes, including SBG's:

- Code of ethics and conduct
- Third-party code of conduct
- Human rights statement
- Exceptions list and restricted activities list
- High-risk sector guidelines
- Group climate policy
- Various position statements.

Governance

The board risk and capital management committee is responsible for approving updates to the group E&S risk standard, policy and monitoring adherence. At executive level, the GROC, chaired by group chief risk and corporate affairs officer, oversees E&S risk management by risk committees and mandated forums, in line with group risk appetite; reviews the results of client and transaction screening and due diligence to assess potential social/human rights and environmental impact, and ensures climate-related risk identification, classification, analysis, monitoring and reporting is embedded in the enterprise-wide risk management system, including client and transaction screening and due diligence.

Group environmental and social risk (GESR) is responsible for reviewing, updating and ensuring the effective implementation of the ESMS, standard and policy. The standard and policy are reviewed and updated every three years, taking into account any changes to global standards and frameworks, national regulatory requirements and internal requirements. During 2024, the standard and policy were amended to include updates to climate, biodiversity, water and supply chain risk assessment criteria and to reflect the evolving governance changes in integrating ESG risks across the various business units. The group risk and capital management board committee approves updates to the E&S risk standard and policy and monitors adherence to the standard and policy.

We align with global good practice and participate in Equator Principles working groups and other bodies focused on ESG risk management and climate risk.

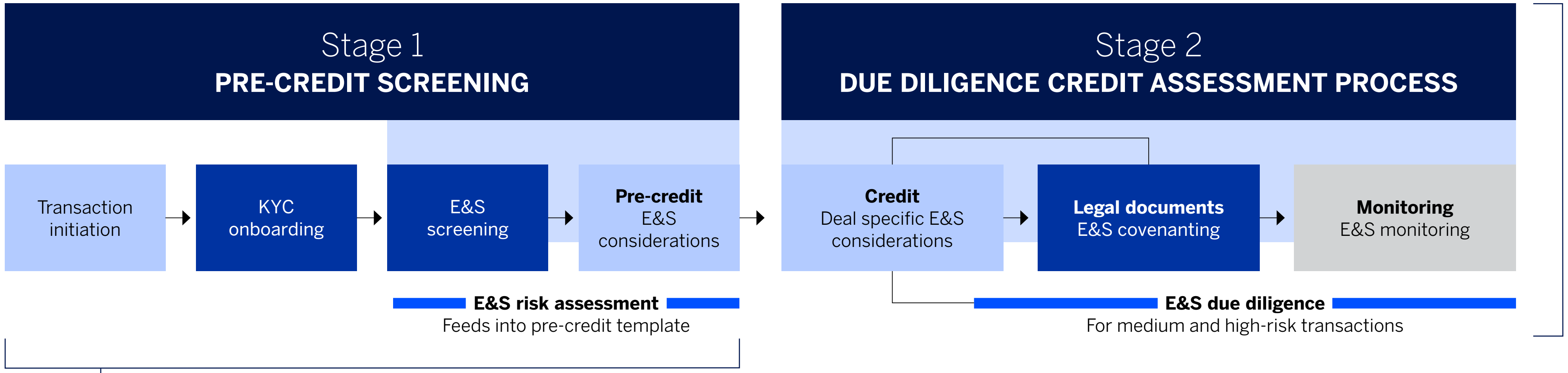
Exclusions

Group-wide exclusions, for which no entity within Standard Bank Group will provide banking or lending facilities, include:

- Production or activities involving harmful or exploitative forms of forced labour or harmful child labour
- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international phase-outs or bans, including ozone depleting substances, polychlorinated biphenyls, and specific hazardous pharmaceuticals, pesticides and herbicides or chemicals; wildlife or products regulated under CITES; unsustainable fishing methods and commercial whaling; use of unbonded asbestos fibres and narcotic drugs
- Production or trade in radioactive materials, excluding uranium mining, medical equipment, quality control equipment or equipment where the radioactive source is understood to be trivial and/or adequately shielded
- Cross-border trade in waste and waste products, unless compliant with the Basel Convention and the underlying regulations
- Production or trade in weapons or munitions, excluding hunting and sports equipment
- Production and distribution of racist and/or neo-Nazi media
- Illegal logging or purchase of illegally harvested timber
- Arctic oil and gas exploration and development
- Mountaintop removal.

Mining or trading of diamonds not certified under the Kimberley Process Certification Scheme.

E&S SCREENING AND DUE DILIGENCE



Stage 1
TYPES OF SCREENING

Standard Bank undertakes E&S screening before entering a new client relationship or approving a transaction or investment.

We use our internal digital E&S screening tool to check for compliance with national laws and standards, compare the transaction to the exclusions list, our E&S risk standard and policy, the SBG climate policy and other group policies. Where applicable, we also apply the IFC Performance Standards and the Equator Principles. Screening assesses potential ESG risks associated with the business, sector, transaction or project. The level of screening is informed by the type of financial product, the quantum and tenor of the transaction and the potential E&S risks involved.

Client risk assessment (CRA)

- Review of risks relating to a client's ability to manage E&S risks and their track record
- Includes assessment of labour issues, negative media coverage, NGO or activist focus, community issues or reputational risk to the group.

Products and services

- We assess E&S risks and impact in the development of new products and services and actively identify opportunities to create positive E&S outcomes.

Transactional risk assessment (TRA)

- Risks associated with the sector and/or the activities to be undertaken, the nature of finance and risks associated with security over assets. Also refers to risks associated with security over assets, including contamination of land.

Applies to:

- Lending applications (corporate and commercial clients) – pre-credit committees use the group's digital E&S screening tool to assess risks, mitigation measures and opportunities
- Investment decisions for companies in high-risk industries or transactions. This includes assessment of the quality of the investee company's ESG related policies, procedures, plans and systems, as well as monitoring and reporting regarding long-term sustainability of strategy and operations.

Issues for which we screen:

Governance risks

Screening includes assessment of whether the client has:

- Appropriate ESMS and E&S governance systems and policies in place, including environmental authorisations, licenses and permits where required
- Any material ESG-related incidents or issues in the past year
- Appropriate controls in respect of fraud and corruption, and whether there have been any negative incidents or issues in this regard, including fines or penalties
- Any fines or penalties or accusations of human rights violations (including child or forced labour)
- Been subject to NGO campaigns, lawsuits, strikes or protests in relation to an E&S issue in the past year.

Social risks, including human rights risk

We identify, assess and manage human rights risks in line with international principles and standards, including the UN Guiding Principles on Business and Human Rights, and **SBG's Human Rights Statement**.

We screen for issues such as:

- Protection of workers' rights, fair treatment of workers and safe and healthy working conditions
- Protection of vulnerable categories of workers, such as migrant workers
- Workplace practices in respect of gender equity, discrimination and freedom of association (for Equator Principles transactions)
- Child labour, and forced and compulsory labour
- Risks to communities, including health and safety
- Safeguarding of personnel and property in accordance with relevant human rights principles and minimising risk to affected communities
- Risk of gender-based violence and harassment (GbVH) and the implementation of appropriate mitigation measures
- Adverse impacts on communities and people from land acquisition, restrictions on land use, resettlement and livelihood changes, displacement or forced eviction. Where avoidance is not possible, impacts on affected communities must be minimised and livelihoods and standards of living of displaced persons improved or restored
- Risks to cultural heritage and/or archaeological resources
- Adverse impacts on indigenous people. If unavoidable, engagement must take place with the impacted community and action taken to minimise, restore and/or compensate for adverse impacts in a culturally appropriate manner commensurate with the nature and scale of such impacts
- Social risks within the supply chain.

Where applicable, we require clients to obtain FPIC from communities affected by their projects and to have a grievance mechanism to address any concerns.

Environmental risks

Screening includes assessment of risks related to climate, nature and biodiversity, water and pollution.

This includes:

- Impacts on landscapes, biodiversity, ecosystems, critical habitats and endangered/IUCN Red-Listed species
- Impacts on surface water, groundwater and air quality
- Pollution from business and/or project activities
- Proper storage and management of hazardous substances
- Sustainable use of resources, including energy and water, and the minimisation of GHG emissions
- Proper storage of all forms of waste, in line with national legislative requirements
- Direct and indirect impacts on biodiversity and ecosystem services
- Integration of conservation needs and development priorities to promote the sustainable management of living natural resources
- Alignment to SBG's **climate policy**
- Appropriate emissions reduction targets and initiatives
- Climate change risk assessment (CCRA) (for Equator Principles transactions).

If any of these risks are present, our E&S team will engage with business to ensure appropriate due diligence is undertaken and, if a decision to proceed with the client relationship or transaction is made, that appropriate monitoring and controls are implemented.

APPLICATION OF SCREENING

Categories of clients/ transactions	Application of screening	Number of clients transactions screened in 2024 and % of total
Corporate clients	All clients undergo annual E&S screening as part of the annual credit review process	2 069 100%
CIB transactions	100% of transactions are screened for E&S risk, as defined by SBG group and business unit governance standards and policies	3 105 100%

BCB SA has implemented E&S screening for commercial clients (annual turnover of R300 million to R1.5 billion) and premium clients (annual turnover of R100 million to R300 million). Clients and transactions receive a TRA rating and a CRA rating.

BCB AR has implemented E&S screening for all transactions. Clients and transactions receive a TRA rating and a CRA rating, using the CIB E&S screening tool.

IAM undertakes screening in line with our responsible investment policy, aligned to UN PRI.

Outcomes of screening

Risks are rated low, medium or high. Screening determines:

- Whether to **proceed** with a transaction
- Whether further E&S **due diligence is required**
- **Level of E&S due diligence required**.

The outcomes of E&S screening are considered by:

- Credit risk committees, which decide whether to onboard or offboard clients for reasons of E&S counterparty risk
- Structured transactions committees, which assess transactions for potential E&S risk
- The new business approval committee, which reviews recommendations from relevant committees, including E&S risk assessments.

RISK ASSESSMENT/SCREENING TYPE	Total	RATINGS LOW	MEDIUM	HIGH
CIB				
Client risk assessment review (new transactions)	**1 036**	96%	3%	1%
New transaction risk assessment	**1 036**	92%	7%	1%
Annual review	**2 069**	97%	2%	1%
Total transactions screened	**3 105**			
BCB				
Client risk assessment	**7 495**	99.79%	0.17%	0.04%
New transaction risk assessment	**6 030**	99.15%	0.6%	0.25%
Total transactions screened	**13 525**			

Stage 2
E&S DUE DILIGENCE

Where E&S risk is deemed medium or high by CRA or TRA screening, E&S due diligence (ESDD) is required.

We engage our clients to ensure that their E&S risk-related functions are appropriately resourced, and that they can effectively manage their material health and safety and E&S related risks and impacts. We encourage our clients to apply the Precautionary Principle to their operations and activities, where applicable. In certain transactions, recommendations and conditions may be implemented as a condition precedent (CP) or condition subsequent (CS).

HIGH-RISK SECTOR GUIDELINES

The group has identified high-risk industries, sectors and areas of high environmental sensitivity that require enhanced due diligence (EDD) before a transaction or investment may be approved. Activities in these sectors must also align with the commitments and targets in the group's climate policy. Our approach is based on IFC sector guidance.

Mining and metals

- Prohibitions as per exceptions list, restrictions as per group policies
- EDD for uranium mining and where site decommissioning and remediation are not adequately addressed.

Oil and gas

- Prohibitions as per exceptions list and climate policy
- EDD for shale gas and shale oil, including hydraulic fracturing and transnational pipelines
- EDD for transactions where site decommissioning and remediation and/or response for oil spills/gas leaks are not adequately addressed.

Thermal coal power

- No finance for construction of new coal-fired power plants nor the expansion in generating capacity of existing coal-fired power plants
- EDD for companies operating coal-fired power plants.

Infrastructure

- EDD for transactions directly related to large dams; construction of new or upgrading of existing nuclear power plants; transactions where site decommissioning; and remediation and/or response for oil spills/gas leaks are not adequately addressed.

Industrial

- Prohibitions as per exceptions list
- EDD for iron and steel foundries and smelters; petrochemical refineries and downstream industries; manufacture of hazardous materials; manufacture of toxic materials.

Agriculture, animal husbandry and fishing

- Prohibitions as per exceptions list and group climate policy
- EDD for activities in high conservation value forests or primary tropical forests; commercial logging; activities relating to palm oil or soy production; excessive fertilisation/runoff.

Equator Principles projects

GESR, supported by E&S assessments from our independent consultants, categorise relevant projects proposed for financing based on the magnitude of potential E&S risks and impacts as Category A, B or C. GESR determines the required scale and scope of ESDD per client or transaction, commensurate with the potential level of E&S risk (low, medium or low).

For all clients and transactions identified during screening as medium or high-risk, including those that are not Project Financing or Equator Principles related transactions, GESR:

- Undertakes an internal desktop E&S review of the client, its operations and the transaction
- Works with business and credit teams to undertake ESDD, which may include sector or issue specific questions, direct client engagement and site visits, and/or the use of independent external E&S consultants
- Applies the Equator Principles and associated IFC Performance Standards and World Bank EHS Guidelines and alignment to local laws and regulations.

Transactions rated as high E&S risk require approval from the head of GESR prior to credit approval.

In 2024, GESR implemented a commercial real estate filter in support of Equator Principle guidance to improve overall E&S assessment procedures in alignment with international best practice.

For Equator Principles transactions:

- The client appoints an external independent environmental and social consultant (IESC), who has duty of care to the lenders
- GESR works with the client to develop the IESC's scope of work for ESDD
- The IESC identifies any issues or gaps in the client's E&S risk management, including compliance with Equator Principles or IFC Performance Standard requirements
- The IESC develops an environmental and social action plan (ESAP), with timeframes, for the client to action
- The ESAP is included in the facility agreement, which may include requirements for mitigation, monitoring and reporting by the client to address E&S risks
- The IESC conducts regular independent monitoring of the client/project.

E&S monitoring

The group undertakes portfolio-wide reviews of high-risk sectors. These reviews inform transaction approval processes and proactive client engagement.

The group portfolio risk management committee reviews the results of portfolio reviews, stress testing, appetite and strategy assessments for all risk types, including E&S risk; sets concentration limits or thresholds of portfolios and risk appetite indicator guidelines for group; and assesses portfolio composition and implications of climate stress testing.

Business is responsible for ongoing monitoring of their portfolios. The frequency and type of monitoring is determined by the type of transaction and the level of risk.

Credit managers apply the digital E&S screening tool as part of regular (at least annual) review of existing transactions and clients. The tool is used to provide a CRA rating and assess whether the client is meeting their E&S commitments.

Risk committees monitor and ensure compliance with E&S contractual obligations in lending and funding agreements.

GESR, as part of the annual credit review process, reviews all Equator Principles transactions categorised as Category A or B; all transactions identified as high E&S risk and all clients identified as high or medium risk.

GESR may undertake site visits, where necessary, to ensure that E&S performance is being managed appropriately.

In terms of our E&S risk management process, all clients that we bank need to be subjected to an assessment of their E&S policies and practices. Any ESG controversies that arise in the ordinary course of our relationship with a given client or any related/group entities need to be investigated, with engagement with the client being initiated as appropriate.

Assessment and monitoring of human rights risks

For Category A and where appropriate, Category B project finance transactions which fall under the scope of the Equator Principles, an assessment of human rights and climate change risk is undertaken as part of due diligence completed by the IESC on behalf of the lenders. For non-project financing, GESR identifies a broad range of ESG issues including potential human rights and climate risk issues based on general monitoring of negative media and campaigns against clients using independent third-party sources of information.

Where human rights risks can be mitigated, we include controls in client legal agreements. This may include policies to address human rights issues and/or provide for collective bargaining, supply chain management and monitoring, compliance with IFC Performance Standards and ILO conventions.

Where relevant, clients implement independently verified monitoring of supply chain or certification processes that address human rights. Examples include the Roundtable on Sustainable Palm Oil (RSPO) and the Better Cotton Initiative. In some instances, we require human rights assessment and monitoring by specialist consultants and annual feedback from clients on progress with action plans and mitigation processes.

Grievance mechanisms

We require all our corporate clients to have in place **grievance mechanisms for their employees** to raise workplace concerns, and to inform employees of these mechanisms. Where it is anticipated that a new project or existing company operations will involve ongoing risk and adverse impacts on surrounding communities, we require the client to establish or provide evidence of a **community grievance mechanism** to receive and facilitate resolution of the affected communities' concerns and complaints about the client's E&S performance (as per the IFC Performance Standards on Social and Environmental Sustainability). The grievance mechanism should be scaled to risks and adverse impacts of the project, address concerns promptly, use an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, and do so at no cost to communities and without retribution. The client is responsible for informing affected communities about the mechanism through its community engagement process.

Stakeholders may also access SBG's **anonymous whistleblowing reporting channel**✓, should they wish to raise their concerns anonymously.

They may also submit queries or concerns to the **GroupSustainability@standardbank.co.za.**

Controls

Where E&S risk is deemed significant, it must be included in risk and control self-assessments, to ensure appropriate controls are identified and mitigation plans developed. E&S incident reporting to the group is included as a condition in loan agreements with clients. Clauses related to E&S issues are included in loan documentation for bilateral and syndicated credit facilities, in line with IFC performance standards and EP requirements. Non-compliance, directives or fines are reported to GESR.

GESR is responsible for:

- Ensuring that appropriate systems and processes are maintained, to collect and store required E&S risk data
- Recording any significant E&S or health and safety risk incident in the operational risk management system and reporting such incidents so that appropriate actions can be taken to prevent recurrence
- Reporting any breaches of the E&S standard or policy, and/or any material E&S counterparty risk, to the relevant decision-making bodies within the group.

We work closely with our clients to assess E&S risks and costs associated with managing them, to identify the most appropriate course of action and optimal mitigation actions. While trade-offs may be necessary, they must not compromise the group's commitment to human rights and responsible E&S management and must always adhere to all applicable laws and regulations. If clients are not compliant with the group's E&S requirements, we work with them to close the gaps and achieve the necessary standards over time, with ongoing monitoring and reporting. If there is no progress toward meeting requirements within agreed timeframes, remedies may include additional monitoring and revised action plans, specialist or independent intervention or re-evaluation of the loan.

We are committed to taking appropriate steps where we discover, or are made aware, that we have contributed to or caused actual or perceived human rights abuses or environmental damage. This may include constructive engagement to promote better practice, or termination of the business relationship.

Training

Targeted business areas (business, credit, legal, coverage) undergo mandatory training on the ESMS and related policies and processes. E&S coordinators at country level receive in-country training.

Interactive training (in-person and virtual) in 2024

1 327
employees

Equator Principles Projects in 2024

92 projects/deals were reviewed in line with the Equator Principles or other applicable frameworks, such as the IFC Performance Standards. **16✓ Equator Principles deals reached financial close** in 2024, together with two project-related non-Equator Principles deals.

One deal was declined on the basis of social issues (resettlement) and other business-related reasons. While the planned resettlement process was IFC PS 5-aligned, delays to the process created the risk for negative impacts for the community and risks to the project's social license to operate.

	Project finance (number)			Project-related corporate loans (number)			Reserve-based lending – refinance (number)		
	Category			Category			Category		
	A	B	C	A	B	C	A	B	C
Oil and gas					1				
Mining									
Power									
Infrastructure	1	13			1				
Other									
Region: Africa									
Designated country									
Non-designated country									
Independent review									
Total	1	13			2				

Equator Principles projects closed in 2024	Sector	Country
Project finance, EP Category A		
Eswatini Hydro LMHPS	Energy and Infrastructure – Hydropower	Eswatini
Project finance, EP Category B		
AMEA Doornhoek	Energy and Infrastructure – Solar PV	South Africa
Northam (Zondereinde) Solar PV		
Project SAL (Solar)		
Air Products ZA PI		
Project SAL (Wind)	Energy and Infrastructure – Wind	
Seriti Ummbila Emoyeni		
Wind Garden PI		
Ishwati Wind Project		
Oasis 1: Aggeneis	Energy and Infrastructure – BESS	
Oasis 1: Nieuwehoop		
Oasis 1: Mookodi		
Scatec Mogobe BESS Project		
Indorama Fertilizer Plant	Energy and Infrastructure	Nigeria
Project Related Corporate Loan, EP Category B		
Super Tech Ltd	Oil and Gas	Nigeria
CrossBoundary Energy	Energy and Infrastructure	Various
Non-EP Projects – Project Related Corporate Loans		
Genser Energy Côte d'Ivoire (Power IPPs)	Energy and Infrastructure	Côte d'Ivoire
Presscane Ltd	Diversified industries	Malawi

Examples of some of our Equator Principles deals in 2024

Wind Garden Project, South Africa – Category B (medium risk) under EP4

The transaction

- The Wind Garden Project is an 86MW wind farm located 18km from Makhanda in the Eastern Cape.
- It amalgamates two adjacent wind energy facilities, the Wind Garden Wind Farm and the Fronteer Wind Farm, comprising 21 wind turbine generators with a total nameplate capacity of 95MW.
- Key infrastructure developments include a 132kV switching station, a 132/33kV collector substation, a transmission connection line, refurbishment of an existing 132kV powerline, and the development of access roads.

E&S risk management

- Both wind farms received separate authorisations in June 2022 through a Basic Assessment Process in accordance with the Environmental Impact Assessment Regulations, 2014, promulgated under the National Environmental Management Act, 1997 (No. 107 of 1997).
- ESDD was conducted on behalf of the lenders as part of the credit process. ESDD assessed the project's alignment and compliance with the IFC Performance Standards on Environmental and Social Sustainability (2012), the Equator Principles (EP4, 2020), the World Bank Group Environmental, Health and Safety Guidelines (2007), industry-specific standards, and local/national laws and regulations. It included the development of an Equator Principles Action Plan (EPAP) to address any gaps identified.
- An E&S Advisor will provide ongoing monitoring during the construction and operational phases.

Socioeconomic and enterprise development

- The project is committed to supporting various socioeconomic development and enterprise development initiatives throughout its lifecycle. Objectives include:
  - Building and maintaining strong, constructive community relations to secure the social license to operate in the region
  - Promoting positive socioeconomic progress in marginalised communities by supporting initiatives that address regional socioeconomic challenges
  - Contributing to the borrowers' Broad-Based Black Economic Empowerment (B-BBEE) rating.
- These efforts are designed to ensure that the project not only meets its environmental and social obligations but also contributes positively to the local community. Additionally, the project aims to create job opportunities and foster skills development within the local community.

CrossBoundary Energy Transaction – Category B (medium risk) under EP4

The transaction

- CrossBoundary Energy (CBE) (a subsidiary of the CrossBoundary Group) is a leading renewable energy developer, providing commercial-scale, independent power producer (IPP) renewable energy solutions to commercial and industrial clients across Africa.
- It finances, installs, owns and operates multiple renewable projects, with solutions including rooftop solar PV, ground-mounted solar, wind power and hybrid energy solutions (renewable energy plus battery storage or diesel generation).
- It currently serves over 40 clients across 13 African countries, with 258MW of solar and wind generation and 51MWh of storage projects.
- In April 2024, CBE signed an arranging mandate letter with Standard Bank to arrange up to USD300 million long-term debt facilities. Based on the loan amount and the tenor, this transaction was classified as an Equator Principles Project Financing transaction.

E&S risk management

- Potential risks include OHS risks associated with installation and operational activities, and environmental impacts such as habitat loss, dust and noise emissions, visual impacts, waste, wastewater and hazardous materials, resettlement and community health safety risks.
- ESDD was conducted on behalf of the lenders as part of the credit process. ESDD assessed CBE's alignment and compliance with the Equator Principles (EP4, 2020), IFC Performance Standards (2012), the World Bank Group Environmental, Health and Safety Guidelines (2007) and local legislative requirements in the countries where its projects operate. It included the development of an Environmental and Social Action Plan (ESAP) to address any gaps identified.
- CBE has developed an Environmental and Social Management System (ESMS) based on the IFC Performance Standards requirements. The ESMS includes an ESG Policy, an E&S exclusion list, an E&S categorisation methodology, a reputation risk review framework for off-takers, an ESDD framework for off-takers, specific environmental health and safety procedures (including waste management procedure, working at height procedure, electrical installation procedure), and tools (including an incident reporting template, screening checklists and contractors screening checklist) to support its investment process and its E&S risk management.
- CBE has developed a code of conduct that applies to all workers, employees and contractors and includes the expectation that it be applied to all CBE's project sites under construction or operations. The code includes requirements relating to non-discrimination, non-harassment, working conditions, prohibition of child labour, anti-bribery and anti-corruption and a whistleblower mechanism.

Stakeholder Engagement

- The ESMS includes a comprehensive Stakeholder Engagement Plan, which requires that various rounds of stakeholder engagement are conducted for every project in which CBE is involved. Each project also has its own grievance mechanism.

Monitoring

- The ESAP provides a list of actions to be undertaken by CBE, with timelines, based on gaps and areas for improvement noted during the ESDD. An independent E&S advisor will provide ongoing independent E&S monitoring during the construction and operational phases of CBE's projects in Africa.

Mogobe Battery Energy Storage (BESS), South Africa – Category B project with reference to the IFC Sustainability Framework (2012)

Transaction overview

Scatec Africa is developing a 103MW/412MWh battery energy storage system facility, under the national government's BESIPPPP. The project will provide dispatchable capacity and ancillary services through a 15-year power purchase agreement with the National Transmission Company of South Africa, a subsidiary of Eskom. It is located near Kathu in the Northern Cape.

E&S risk management

The project will create employment and local economic development and deliver renewable and sustainable power generation and community investment. Potential risks during construction include impacts on protected species, dust and noise emissions, mismanagement of waste, wastewater and hazardous materials, OHS and human relations risks in relation to construction workers, supply chain risks, and risks related to the influx of people into the area. Potential risks during the operational phase include OHS and labour risks, avifauna risks and potential impacts from waste and wastewater.

Scatec has the necessary Environmental Authorisation (EA) in place for the project, as well as other relevant authorisations and permits. Independent ESDD was conducted on behalf of Standard Bank as part of the credit process, including the development of an ESAP to address any gaps identified. The ESDD assessed Scatec's and the Mogobe BESS Project's alignment with and compliance with South African legislative requirements, the Equator Principles (Version 4, 2020), the IFC Performance Standards (2012) and the World Bank Group Environmental, Health and Safety Guidelines (2007).

Several specialist studies were undertaken as part of the impact assessment process, including a terrestrial ecology study, socioeconomic impact assessment, archaeological study and traffic study. Scatec has developed a corporate ESMS to direct the company's environmental and social activities. This includes policies, procedures and tools to identify and manage the company's exposure to the E&S risks associated with the projects and contractors' and sub-contractors' activities. It includes E&S principles for business conduct, and procedures for identifying and managing environmental risks and impacts. It commits Scatec to carry out all its business activities in accordance with international standards including the IFC Performance Standards, the Equator Principles, and the World Bank Group (WBG) EHS Guidelines.

Stakeholder engagement and grievance mechanism

A Stakeholder Engagement Plan (SEP) is in place for the project and stakeholder engagement is being conducted as the project progresses. A grievance mechanism for the project is in place.

Monitoring

The ESAP provides a list of actions to be undertaken by Scatec and associated timelines. An independent E&S advisor has been appointed to provide ongoing independent E&S monitoring during the construction and operational phases of the project.

Managing climate-related risks and opportunities

Our approach to managing climate-related risk and opportunity is grounded in our group purpose: Africa is our home, we drive her growth. SBG is committed to helping African economies achieve a just energy transition, supporting access to affordable energy in our countries of operation while managing climate risk and supporting the transition to a low-carbon future. Climate change and the energy transition present a material risk and significant opportunity for SBG. Information in this regard is available in our **climate-related financial disclosures report.**

Our approach is two pronged:

1 Integrated climate opportunities

Business units are responsible for **integrating climate-related opportunities and risks into business strategy** and setting and meeting climate commitments and targets in line with the group climate policy.

- We have set commitments and targets to reduce portfolio exposure to high emissions sectors,
- We continue to expand our sustainable finance offering, including increasing finance for renewable energy, distributed energy systems, green buildings, sustainable agriculture, reforestation and high-quality carbon offset programmes; and working with clients across priority sectors to improve their climate resilience and reduce their carbon emissions.
- We offer various solutions to support households and businesses to shift to more energy efficient and renewable energy solutions.

2 Managing climate-related risks

Our group-led **climate risk management programme** integrates climate-related risks into the overall risk management framework as a transverse risk that impacts other risk types. Our most material exposure is to credit risk, given the vulnerabilities of specific sectors, industries and clients to the physical and transition risks associated with climate change. We also assess risk in relation to business continuity, reputation and market risk.

- Climate-related risk is considered a strategic risk and is integrated into relevant business processes, including client due diligence, credit assessments, E&S risk management and portfolio reviews.

Nature and biodiversity

We continue to build internal capacity to better understand and manage nature and biodiversity risks, impacts and opportunities.

- We participated in the PRB Nature Working Group, learning from peer banks and monitoring global developments relating to nature-related disclosures.
- We participated in a pilot project with the SARB and the Prudential Authority, to build an understanding of nature-related risk for South African banks. The pilot used ENCORE as an analysis framework to assess credit exposure and dependency in banks' agriculture portfolios (combining ENCORE database data on ecosystem service dependencies with banking portfolio data to assess risk exposure). SARB has aggregated the data to assess nature-related risk exposure and dependency at the micro-prudential level.
- We are working with the UNEP FI to build our capacity to assess and manage nature-related risks and impacts.
- We continue to engage with our clients to identify opportunities to support conservation and restoration of nature.

3

ETHICAL CONDUCT AND BUSINESS PRACTICES

ETHICS AND CONDUCT

Our group code of ethics and conduct guides our decision-making, behaviours and interactions with our diverse stakeholders.

It informs how we conduct ourselves in terms of how we treat one another, our clients and other stakeholders and how we manage our impact on society and the environment. It informs group policies, standards and risk management controls. It can be found on **our website**.

The code is applicable to all Standard Bank employees (full-time and part-time) and consultants. It applies to our board members, including non-executives, and to employees of our subsidiaries, except where the subsidiary has its own code of ethics which aligns with Standard Bank's code. The code informs our group policies, standards and risk management controls. Adherence to the values, principles and behaviours described in the code is an integral part of the group's performance management process. Our incentives and reward structures align with the values, principles and expected behaviours specified in the code, and promote employee behaviour that creates fair client outcomes and maintains market integrity.

Our code aligns with global and national regulatory and governance standards across our countries of operation. It helps us ensure that we conduct ourselves lawfully and within the legal frameworks of the countries in which we operate. It aims to empower us to make principle-based decisions, and to encourage honest and robust discussion to determine the appropriate course of action in any situation.

OUR CODE OF ETHICS AND CONDUCT IS BASED ON THREE PILLARS

1 Conduct in the market
How we do business

- We treat our clients fairly.
- We communicate effectively and proactively with our clients.
- We are responsive to client complaints.
- We value the right to privacy and take all reasonable steps to ensure we process personal information lawfully.
- We use data and AI responsibly.
- We proactively detect and prevent financial crime.
- We support the orderly, fair and transparent functioning of financial markets and do not engage in non-competitive behaviour.
- We ensure commission payments are legitimate and legal.
- We keep appropriate records.
- We ensure the accurate public reporting of our financial statements and transparency on tax matters.

2 Personal conduct
Our responsibilities to one another and the group

- We promote diversity and inclusion.
- We do not tolerate unfair discrimination, bullying or harassment.
- We support our employees to develop their skills and careers.
- We ensure performance management processes enable constructive feedback and employee development.
- We recognise and reward our people fairly, and we incentivise ethical behaviour.
- We encourage innovation and collaboration to achieve better client outcomes.
- We take responsibility for how we represent the group in public.
- We ensure that gift and entertainment giving or receiving is carefully managed and declared to prevent impropriety.
- We take all reasonable steps to prevent or fairly manage potential conflicts of interest.
- We protect the group's physical and information assets.
- We maintain a healthy and safe work environment.
- We enjoy freedom of association and collective organisation.

3 Societal conduct
Our impact on society and the environment

- We understand and manage our social, economic and environmental impacts.
- We strive to create shared value for our stakeholders, including shareholders, clients, employees and the societies in which we operate, in line with our positive impact value driver.
- We respect human rights.
- We promote financial inclusion.
- We engage constructively with our stakeholders.
- We are responsible in our procurement practices and third-party relationships.
- We commit to reducing our operational and financed carbon emissions in line with the group's climate policy and the Paris Agreement.
- We have clear rules that govern corporate political action and funding of political parties.
- We undertake corporate social investment that creates sustainable benefits for our communities.

Our code of ethics and conduct is supported by our comprehensive approach to conduct risk management. Conduct risk is the risk that harm is caused to the group's clients, the market or the group itself because of inappropriate conduct and behaviour in the execution of business activities. It encompasses governance arrangements, business models, product development, sales practices, treating clients fairly and remuneration and incentive structures. We strive to meet clients' expectation for fair outcomes and market integrity by doing the right business the right way, thereby upholding the trust of all our stakeholders.

Conduct risk is governed by risk committees within business units and corporate functions, together with the social and ethics management committee and group social, ethics and sustainability committee. Conduct oversight committees are responsible for:

- Promoting sound culture and conduct standards
- Identifying emerging trends in conduct and behaviour
- Aligning conduct risk management with regulatory requirements and business objectives
- Monitoring and interrogating conduct risk management information and indicators
- Identifying conduct risk specific to their business and taking appropriate risk mitigating actions
- Reporting conduct risk management information and material control issues to enable the board and executive management to exercise oversight and management.

All business units and corporate functions must regularly assess the impact of changes on conduct risk exposure arising from new product development, third-party relationships, regulatory trends, business models and material system and process changes.

Employee responsibilities

We have a culture-led approach to managing conduct. We expect employees to uphold the highest level of integrity and take accountability for their actions in line with our values and code of ethics and conduct. All employees are required to read, understand and attest to follow the code on joining the Standard Bank Group. The group has no tolerance for illegal, unethical or dishonest behaviour which was knowingly conducted.

Conduct risk management is integrated into all relevant group policies and processes and managed as part of the group's non-financial risk management framework. Our conduct risk policy sets out the requirements for timely identification, reporting, escalation and remediation when conduct risk is identified.

All employees must complete mandatory online training on the code and related policies and attest to having done so. Training uses case studies and includes practical scenarios designed to deepen employee understanding. Employees may also be required to undertake role-specific training to understand and manage relevant conduct risks within the context of their business units and responsibilities. Financial advisory and intermediary services (FAIS) representatives and key individuals are required to obtain accreditation to ensure appropriate awareness and management of conduct risk.

In 2024, **99% of group employees completed training** based on the group code of ethics and conduct, with modules on business conduct, personal conduct, client conduct and managing the compliance risks associated with our conduct.

Areas of focus in 2024

Priority issues, such as achieving fair outcomes for clients, ensuring all clients are treated objectively and fairly, promoting financial inclusion, responsible lending and combatting financial crime continued to receive executive and board attention. These issues will continue to be prioritised in the year ahead.

We monitor customer complaints and reports received via the group's whistleblowing channels on an ongoing basis, to identify trends and areas for improvement.

We recognise that employees may be more susceptible to the risk of unethical conduct when experiencing financial pressures in their personal lives. We are committed to supporting our employees to maintain financial health, and provide a range of programmes to support employee financial wellbeing.

Managing risk incidents and breaches

Executives are responsible for monitoring and interrogating conduct dashboards and implementing mitigating and remedial actions when material concerns or issues arise.

Employees are regularly reminded, via training and communication campaigns, to report any behaviour contrary to the code. Effective consequence management practices are in place for unethical behaviour. A breach of the code is a violation of terms of employment. Breaches may be subject to disciplinary action, up to and including dismissal.

Group internal audit undertakes audits on various risk subjects, including employee conduct, fraud, money laundering, bribery and corruption. It also assesses risk culture as part of the audit process, including elements of the group's code of ethics and conduct. Outcomes are reported to the relevant board committees.

Monitoring compliance

We monitor the effectiveness of our business conduct and ethics management processes by observing early warning indicators of conduct risks, analysing trends in conduct incidents, reviewing risk control self-assessment data and assessing progress on action plans. Each business unit and corporate function assesses the effectiveness of conduct risk controls against the governance, non-financial risk and financial crime risk control assessment matrix.

All areas of the business submit quarterly conduct dashboards to executive management. The dashboards include information about risks, complaints and grievances received via various channels, investigations, breaches and remedial actions taken. The dashboards are reviewed by the social and ethics management committee and GSEC.

During 2024, conduct risk remained within risk appetite, as assessed by the various lines of business. Conduct-related breaches were addressed within specific business areas.

Since 2021, our regulators in Angola, Eswatini, Mozambique and South Africa have held conduct-specific inspections. Outcomes from these inspections are escalated as appropriate and all relevant lines of defence work together to address findings.

	Outcomes of misconduct investigations, 2024
Disciplinary cases as percentage of employees	11.5%
Referrals resulting in written warnings	6%
Referrals resulting in targeted coaching	19%
# Dismissals due to misconduct	396
Dismissals as % of total employees	0.7%

Respecting human rights

Standard Bank is committed to respecting the **human rights** of people involved in and impacted by our business.

We define human rights as the basic and universal rights that underpin each person's inherent freedom, dignity, and equality, as outlined in the UN Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. We align with the UN Principles for Business and Human Rights in terms of understanding our role in ensuring that human rights are respected.

We do not tolerate slavery, forced labour or human trafficking in any form and will never knowingly be party to any activity that would violate the modern slavery laws and requirements that apply to us.

Certain of our countries of operation have anti-homosexuality legislation in place. We are committed to protecting the rights of our employees to be free from discrimination at their place of work, while complying with local regulatory requirements in those jurisdictions.

As part of SBG's annual materiality assessment, we asked internal and external stakeholders for their views on SBG's salient human rights impacts (measured in terms of severity and likelihood of impact on the rights holder). Identified issues included:

- Impact as an employer, in terms of labour practices and organisational culture
- Management of social risk in relation to financing and investment activities
- Role in combatting financial crime
- Role in enabling financial inclusion
- Use of advocacy/leverage to promote rights protection.

SBG is working to assess the likelihood and severity of identified risks and impacts, and the effectiveness of our controls. This will inform recommendations to GSESC, and updates to our human rights statement, risk register and controls in 2025.

We seek to avoid causing human rights infringements and being complicit in the human rights infringements of other parties. We require all employees to report any alleged or suspected human rights violations to the appropriate leadership structures or via the group's **anonymous whistleblowing reporting channel.**✓

We take appropriate steps where we discover, or are made aware, that we have caused or contributed to actual or perceived human rights abuses. This may include disciplinary action, exiting a business relationship, or constructive engagement to promote better practice.

We integrate respect for human rights into our day-to-day operations and in the way we do business. We make specific provisions in relation to different stakeholder groups.

Employees and contractors

- Our work environment promotes equitable treatment, diversity and inclusion, respect and dignity, and the right to speak up and be heard.
- These commitments apply to all employees and contractors, and are reflected in our people policies and practices, including our code of ethics and conduct, and policies governing diversity and inclusion, occupational health and safety, fair labour practices, protection against discrimination, harassment, sexual harassment and bullying.
- Our people are free to express their concerns through established whistleblowing procedures, without fear of retaliation or victimisation.
- We respect the right to freedom of association and the freedom not to associate, including the right to collective organisation and representation.
- We actively promote employee wellbeing, including physical, mental and financial health.
- More information is available in the **Our People** section of this report.

Our clients

- We ensure our clients are treated fairly and access to services is equitable.
- We protect the personal information of all our data subjects including our clients, third parties and employees. We prioritise data privacy rights as a fundamental human right and apply robust processes to give protection to this right.
- We support financial inclusion among under-served communities and customer segments.
- More information is available in the **Fair outcomes for clients,** and the **Data security, privacy and cybersecurity** sections of this report, and in our **Report to Society**.

Suppliers and service providers

- We monitor ESG risk in our supply chain.
- We require all third parties to acknowledge our **third-party code of conduct**, which is based on the group code of ethics and conduct, or to attest that their company has a code of conduct aligned to the SBG requirements. The code requires all our third parties to respect basic human rights, promote the health and safety of workers and establish a clean and safe working environment. This includes adherence to health and safety laws and regulations, regulation of working hours, payment of appropriate wages, prohibition of forced labour, child labour or discrimination, and respect for their employees' freedom of association.
- More information is available in the **Procurement and third-party relationships** section of this report.

People impacted by our business activities

- We are committed to combatting financial crime and corruption in all its forms, including extortion, bribery and money laundering
- We exercise due diligence to understand and mitigate the potential human rights impacts of our business relationships, including who and what we finance. We adhere to international standards including the IFC Performance Standards and the Equator Principles in relation to project financing.
- Our group physical security code of conduct and physical security policy affirm our responsibility to respect the human rights of all those affected by our business activities, including security personnel, clients, suppliers, visitors to our buildings and community members.
- More information is available in the **Mitigating negative impact and managing environmental and social risk** section of this report.

Whistleblowing

We have a comprehensive process in place to enable employees and external stakeholders to raise concerns if they become aware of behaviours or actions that they believe are not in line with the group's values and code of ethics and conduct.

The group's whistleblowing policy provides for the protected disclosure of a whistleblower in terms of **South Africa's Protected Disclosures Act (No. 26 of 2000)** and the **Amendment Act (No. 5 of 2017)** or other similar legislation in a specific country. This allows whistleblowers to raise concerns and make disclosures in good faith without fear of victimisation or prejudice. The group is not obliged to protect a whistleblower if they make a disclosure in bad faith or maliciously make a false disclosure, unfairly or unjustly dishonour another, or conceal their own involvement in criminal activities and/or their own unethical behaviour.

Issues which may be reported include:

- Behaviour that is not in line with the group's values and code of ethics and conduct
- Behaviour that is likely to cause financial harm or reputational damage to the group
- Failure to comply with the applicable country domiciled law
- Abuse of human rights
- Any instance or suspected instance of injustice
- Discrimination, harassment, victimisation, bullying or sexual misconduct
- Danger to the health and safety of an individual
- Adverse social or environmental impacts arising from projects or activities financed by the group
- Abuse of power or authority
- Fraud, theft, bribery or corruption
- Abuse of group or client resources and assets
- Misrepresentation of information
- Mismanagement or maladministration
- Deliberately concealing information about any of the above.

Whistleblowing channels

The group provides various reporting options, including an **anonymous whistleblowing reporting channel**✓. External stakeholders are encouraged to use this channel.

Information on our whistleblowing policy and processes is readily available to all employees. We actively encourage employees to use these channels through regular email communications and training interventions. Internal reports and disclosures are treated on a case-by-case basis. Employees may raise concerns or report issues via:

- Head: Group forensic services (GFS) or the in-country equivalent
- Line management or a member of the executive management team
- The **anonymous whistleblowing reporting channel.**✓

We encourage all stakeholders to use the group's whistleblowing reporting options in the first instance. If a whistleblower is not satisfied that a raised concern has been adequately addressed internally, the following external channels (or other similar channels in a specific country) are available:

- A legal representative, whose occupation must involve the giving of legal advice
- Public Protector (or similar per jurisdiction)
- The Public Service Commission (or similar per jurisdiction)
- A prescribed person or body, who a whistleblower reasonably believes will appropriately deal with the matter.

Investigations

In terms of the group's contractual obligation with our external whistleblowing service provider, we are obliged to assess all disclosures received from whistleblowers. These are assessed independently, objectively and with the highest levels of confidentiality. GFS ensures that all whistleblowing disclosures received by the whistleblowing service provider are reviewed, investigated or redirected to the appropriate teams within SBG for adoption (for example, people related issues are referred to human capital and employee relations, ESG-related issues, including human rights issues, are referred to group sustainability). Feedback on the outcomes of the assessments are provided to the whistleblowing service provider for record keeping and where possible, to the whistleblower.

2024 METRICS (ROUNDED UP TO WHOLE NUMBERS)

	Whistleblowing reporting channel
Total referrals	512
Unsubstantiated	33%
Not investigated (insufficient information, caller retracted report, multiple reports)	20%
Operational referrals	13%
Still under investigation (outcome pending)	13%
Investigation completed and action taken	20%

	Categories of whistleblowing incidents
Theft, fraud, dishonesty and misconduct	51%
Abuse of power, favouritism, discrimination, unfair/unequal treatment or harassment	33%
Complaint by third-party or client service related	13%
Bribery or corruption	3%

Fair outcomes for clients

We are committed to placing our clients at the centre of our business. We engage our clients and assess their experiences with us through surveys, online communication channels, our call centres, social media and in-person contact. We track a **net promoter score** for personal and business clients, and a **client satisfaction index** for CIB clients.

Fair pricing

We provide our customers with clear information regarding fees and costs payable. Relevant committees oversee pricing considerations, annual pricing reviews and other business as usual reviews. Pricing reviews assess customer insights obtained through surveys, complaints and feedback received through relationship managers, together with information regarding the competitive environment, regulatory guidance and cost to serve. Second line functions including group compliance and group risk participate in pricing approval processes, to ensure that customers are treated fairly.

Product design and delivery

The group is committed to providing our products and services honestly, fairly, with due skill, care and diligence, and in the interest of clients. We provide specific product training for sales employees and third-party suppliers within authorised roles. We commit to:

- Providing clients with clear, transparent and appropriate product information, including information on features and risks
- Providing all relevant disclosures before, during and at final contract for the product or service
- Ensuring information provided to clients is factually correct, in plain language and not misleading, and adequate and appropriate in the circumstances, taking account of the established or reasonably assumed level of knowledge of the client
- Providing information timeously to give clients reasonably sufficient time to make an informed decision
- Ensuring client needs and eligibility of products are identified through a robust and objective evaluation process
- Considering clients' individual circumstances and ability to bear associated costs or risks when providing products and services.

We identify and implement product changes and enhancements based on regular feedback from employees, including frontline employees and customers.

- Products are subject to ongoing review, monitoring and reporting of performance and suitability at monthly product risk and compliance committees and the product governance committee
- We analyse client experience measures and complaint data regularly to identify potential areas for improvement
- We monitor experience scores such as app ratings
- We measure real-time client experience on a sample of clients to assess trends, looking at NPS, how well clients have achieved their intended purpose in an interaction, and Banker Ratings.

Advertising and marketing

The marketing and communication (M&C) risk and conduct control committee oversees the group's M&C operating model and is responsible for the management of risk within M&C, including adherence to the group code of ethics and conduct. The committee meets quarterly. Material advertising and communications campaigns or initiatives are presented at a bi-weekly forum which provides feedback on issues such as regulatory compliance, customer relevance, brand alignment and clarity. The forum, together with business, group legal and group compliance, all play a part in the advertising approval process, helping to ensure the achievement of fair customer outcomes and compliance with disclosure requirements.

While the development of advertising is outsourced, no outsourced supplier is mandated to place advertisements on our behalf and advertisements may not be placed without the group's approval process being followed.

We provide funding to South Africa's Advertising Regulatory Board (ARB). The ARB is an independent body set up and paid for by the marketing communication industry to ensure that its system of self-regulation works in the public interest. The ARB code is based on the international code of advertising practice, prepared by the International Chamber of Commerce.

Customers may opt out of any and all forms of digital and direct marketing. We differentiate between marketing material and critical operational communication. For example, should our banking systems experience an outage, we will still communicate relevant information to clients who may have opted out of direct marketing, such as the status of the outage, alternative means of banking and progress on resolving the issue.

Responsible lending

Standard Bank is committed to responsible lending and ethical business practices.

We uphold robust risk management practices in providing lending products to assist our clients in maintaining financial stability. Our group credit standard establishes and defines principles under which the group is prepared to assume credit risk.

This is supported by the PPB group credit policy and various frameworks and guidelines that underpin our approach to credit risk management and responsible lending practices across the group, as applicable in South Africa, Africa Regions and Standard Bank Offshore. Each country is responsible for ensuring compliance with the group framework, national regulations and directives and our commitment to treating customers fairly.

Assisting clients in financial distress

We are committed to promoting the financial wellbeing of our clients and supporting them during difficult times. For clients who find themselves in financial difficulty, we offer a range of tailored debt solutions, which aim to enable affordability and assist our clients in meeting their monthly financial commitments.

These include:

- **Full payment holidays:** the option to defer monthly payments for a period of up to 6 months
- **Debt consolidation:** Streamlining clients' debt repayments into either a home loan or an Advance account, thereby simplifying monthly repayments
- **Partial payment holidays:** the option to pay a reduced instalment for a period of up to 6 months
- **Reduced or fixed interest rate:** Allowing clients to pay a fixed instalment thus maintaining affordability
- **Respread of arrears:** Arrears respread over the remaining term to keep the monthly instalment consistent
- **EasySell programme:** Where tailor-made solutions are not viable or sustainable, we have a dedicated EasySell platform, which facilitates the sale of client's assets, minimising losses that may occur at a forced sale in execution.
- **Term extension:** Extending repayment terms to reduce the monthly instalment value

As part of our always on, always secure commitment, we provide clients with several self-help channels, including WhatsApp, USSD, Internet banking and our banking app, to make payment arrangements or to request a call back. Skilled and experienced debt solution consultants, from our specialised debt care centre, work with individual clients to tailor appropriate solutions.

Debt collection

Debt collection is a pivotal part of effective credit risk management, client rehabilitation and retention. Standard Bank takes a client centric approach, with an emphasis on empathy, respect and understanding of the client's circumstances while aiming to recover the debt. We engage with clients timeously and provide clear and transparent information about repayment options.

Employees in collections are empowered to work with our clients to tailor a repayment plan that takes into account each client's unique financial situation and ability to pay. Private Banking clients have access to a team of qualified debt solution consultants, who work with the private banker to find the best solution for the client. When required, we request outside collection agents to meet with clients in person at their home or other place of reference to discuss their financial situation and repayment options.

Use of third-parties to collect debt and engagement protocols

We are fully committed to the principles of Treating Clients Fairly (TCF). We regard all third-party service providers as business partners, and an extension of the bank. We ensure that all third-party service providers contracted to provide a debt collection service to the bank:

- Are held to the same ethical standards to which we hold ourselves
- Are governed by service agreements which clearly outline the legislative and regulatory parameters within which they must act
- Undergo a vigorous and stringent onboarding process in accordance with our procurement and transformation policies
- Complete the group's client experience training and commit to our service excellence principles
- Receive full training on all the debt solutions on offer to our clients and are able to provide clients with information on the options available to them.

Legal recoveries

If all debt recovery options have been exhausted and we are still unable to assist clients to find a solution, we will consider legal action to recover the outstanding debt owed to the bank. This is always a last resort, and we remain willing to explore alternative solutions even after the legal recovery process has commenced. We have a hands-on approach to legal recoveries. We provide all our attorneys with a set of guidelines and precedent legal documents to ensure compliance with relevant acts, court rules and regulations.

Employee training on debt solutions and regulatory processes

We aim to deliver a consistent and predictable client experience every time a client interacts with the group. All employees in our debt solution and collection teams must complete our service excellence training programme. The training focuses on putting ourselves in our clients' shoes and engaging with empathy, to support the identification of win-win solutions that give clients hope during the difficult times. All employees must also complete relevant compliance training on an annual basis, to ensure their awareness and understanding of the regulatory and conduct environment in which they operate.

We provide access to training toolkits on our internal training platforms and on the Standard Bank client experience app. We ensure employees are kept abreast of regulatory changes and modifications to legal procedures, keeping them up to date with the changing environment of responsible lending.

The debt care centre runs masterclasses for customer facing employees. Employees in debt solutions, collections and recoveries receive regular training on the technical aspect of their respective roles. Employees in our deceased estates, debt review, and insolvency teams receive specialised training to ensure they have the necessary skills and expertise to guide clients through the relevant processes.

Resolving customer complaints

Our complaints management system is modelled on the principles of fairness, accessibility, responsiveness and efficiency. Our complaints management policy is designed to serve our customers and comply with applicable regulatory obligations across the group, ensuring that the roles and responsibilities of all stakeholders are clearly set out and the requirements for complaints management procedures are documented. The policy applies to all employees of the group. It reflects the group's minimum requirements. It may be supplemented by additional requirements in a local jurisdiction, or by a business policy or procedure. Each business area has a complaints management framework and a complaint resolution system (CRS) that enables the capturing and management of complaints. Each area's complaints management procedure is publicly available.

Business areas maintain management information in respect of all complaints and use this for root cause analysis to ensure appropriate action is taken to address areas of concern. Employees responsible for the capturing, management and resolution of complaints receive relevant training. When compensating a client, the principles of treating customers fairly and all other relevant legislation is considered.

In South Africa, PPB and BCB have:

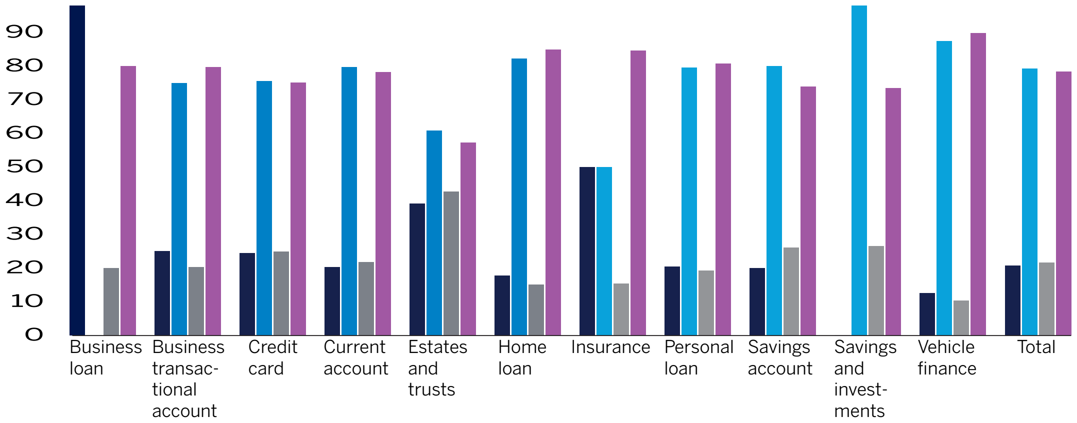
- A dedicated **complaints management team**, responsible for complaints management, detection and prevention. These teams are responsible for dealing with complaints logged directly by customers, complaints and disputes referred to them internally by executives, and informal referrals from the National Financial Ombud Scheme of SA (NFO)[1].
- A dedicated team responsible for **monitoring and oversight** of adherence to the complaints management framework and addressing any issues arising to ensure effective complaint management and improved client experience.

An independent and impartial internal **Customer Dispute Adjudicator** (CDA) is mandated to resolve disputes between the bank and customers independently, by means of adjudication, taking into account the law, equity, industry codes and good banking practice. Disputes that may be escalated to the office of the CDA include those referred by relevant Ombuds, the Financial Sector Conduct Authority (FSCA), and other regulatory bodies or consumer bodies. The CDA does not have jurisdiction in respect of decisions to grant credit (commercial discretion); pricing (fees and charges unless the complaint relates to the incorrect application of SBSA's fee structure); material disputes of fact that cannot be resolved on a balance of probabilities; disputes best suited to an alternative forum (such as a court of law due to complexity); corporate and investment banking related disputes; and offshore banking services and solutions unless the dispute is escalated by the FAIS Ombud's office.

[1] Previously the Ombudsman for Banking Services (OBS), which amalgamated with the other voluntary ombudsman schemes on 1 March 2024.

Complaints management metrics 2024	PPB SA	BCB SA
Year-on-year complaint volumes (%)	**Down by 6%**	**Down by 7%**
Average complaint resolution time	**3.5 days**	**3.6 days**
Complaints resolved within service level agreement (%)	**94%**	**94%**

Resolutions per product (%) SBSA and industry



	Business loan	Business transactional account	Credit card	Current account	Estates and trusts	Home loan	Insurance	Personal loan	Savings account	Savings and investments	Vehicle finance	Total
SBSA in favour of the customer	100.00[1]	25.00	24.42	20.23	39.13	17.78	50.00	20.41	20.00	0.00	12.50	**20.70**
SBSA in favour of the bank	0.00	75.00	75.58	79.77	60.87	82.22	50.00	79.59	80	100.00	87.50	**79.30**
Industry in favour of the customer	20.00	20.31	24.86	21.75	42.70	15.11	15.38	19.19	26.10	26.53	10.26	**21.62**
Industry in favour of the bank	80.00	79.69	75.14	78.25	57.30	84.89	84.62	80.81	73.90	73.47	89.74	**78.38**

1 This metric relates to a single case.

Other disputes

The CDA also dealt with 95 formal complaints via the FAIS Ombud, and 229 complaints via other regulators and customers. SBSA paid customers R4.7 million as a result of these disputes.

Complaints taken to the Ombud

In 2024, we paid R6 million to PPB customers and R2.1 million to BCB customers as a result of OBS/NFO disputes. 48% of PPB and 40% of BCB cases were about current accounts, and mainly related to fraud issues.

The high proportion of complaints closed by the Ombud in favour of SBSA demonstrates the fair treatment of customers prior to escalations to the Ombud.

	2022	2023	2024
Number of complaints filed with the ombud PPB SA	1 385 down 33%	1 311 down 5%	**1 066 down 19%**
Number of complaints filed with the ombud BCB SA	111	145	**164**
% of overall complaints among SA's top five banks	19	18	**20**
% of complaints closed by the NFO in favour of SBSA	74	77	**79**

Preventing market abuse

The group seeks to maintain the highest standards of professional conduct when undertaking financial market transactions, communicating with market participants and handling confidential information. Our market abuse control framework aims to ensure that the group and our employees support the orderly, fair and transparent functioning of the financial market, encourage its integrity and contribute to the enhancement of financial stability in the markets within which we operate.

The framework aims to ensure that there are adequate and effective controls in place to prevent, manage and/or mitigate market abuse risk. Market abuse includes insider trading, unlawful publication of inside information, prohibited trading practices and publishing of false, misleading or deceptive statements, promises and/or market forecasts.

Employee responsibilities

- When undertaking financial market transactions, communicating with market participants or handling confidential information, employees must consider whether their conduct, or the conduct of other parties, could amount to any actual or potential instances of market abuse.
- Employees must be aware of and adhere to all market abuse related laws and regulations that apply within the jurisdictions in which they are located, act or transact or where they facilitate transactions on behalf of others.
- Any employee who reasonably suspects that conduct could lead to or has led to possible market abuse or non-compliance with this policy, must timeously notify the group market abuse surveillance compliance function, or the group's anonymous **anonymous whistleblowing reporting channel.**✓
- Employees must complete mandatory training on the market abuse policy and related policies.

Incidents of non-compliance with the market abuse policy are investigated by the group market abuse surveillance compliance function with the assistance of group forensic services, operational risk and other relevant functions. Failure to adhere to the policy may lead to disciplinary action and possible dismissal.

Incidents

On 8 January 2024 South Africa's Competition Appeal Court upheld Standard Bank's appeal and dismissed the Competition Commission's complaint of currency manipulation. The court accepted Standard Bank's evidence that it had not been party to an international conspiracy to manipulate trading in the USD/ZAR currency pair and stated that the case against Standard Bank 'does not get out of the legal starting blocks'. The Competition Commission has applied to the Constitutional Court to hear an appeal. SBG has opposed this appeal and a hearing date is awaited.

Preventing conflicts of interest

A conflict of interest arises in any activity or transaction to which any group entity is a party, or for which any group entity provides services, where:

- The interests of the group and our client conflict or are incompatible
- The personal interests of an employee or agent of the group conflict or are incompatible with those of our client
- The personal interests of an employee or agent of the group conflict or are incompatible with those of the group.

Our conflicts of interest control framework ensures that conflict of interest risk is adequately managed. The framework provides for processes, procedures and mechanisms to identify, prevent and manage conflicts of interest to:

- Ensure the fair treatment of clients
- Maintain a sound financial environment
- Prevent the misuse of need-to-know information
- Protect the good reputation of Standard Bank Group and the industry.

We take all reasonable steps to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of clients. Measures include appropriate and prior disclosure to our clients, subject to applicable confidentiality constraints, and disclosure of the steps taken to mitigate such conflicts. The group has implemented relevant policies and procedures under the framework, including the **conflicts of interest policy** which aims to ensure that the group and all our employees comply with the applicable statutory and regulatory obligations by ensuring that all reasonable steps have been taken to prevent or fairly manage potential conflicts of interest and mitigate the effect that such conflicts could have on our clients and the group. The policy reflects the minimum requirements that need to be adhered to, to ensure that all reasonable steps are taken to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of our clients.

Employee and third-party responsibilities

- All employees, consultants, contractors, suppliers, other associated persons and other third parties must always act honestly and with integrity, must be alert to potential conflicts of interest and must fairly manage all conflicts of interest.
- All employees must:
  - Comply with the group outside business interests (OBI) policy
  - Obtain approval before entering into an OBI, and declare any OBI held by themselves or their related parties
  - Promptly report any concerns about a potential conflict of interest to the relevant compliance functions
  - Complete annual mandatory training on the conflicts of interest policy and related policies.
- All employees and board members must report their outside business interests and personal account trading details every year. Designated independent service providers must report their personal account trading details every year. This information is tracked and reported along with compliance training data. We require a 100% completion rate for declaration of outside business interests and personal account trading.
- Conflict of interest breaches largely relate to non-compliance with policy requirements in respect of Outside Business Interests, Personal Account Trading and Gifts and Entertainment. These are managed in country as and when they occur, and consequence management is adopted as appropriate.

Combatting financial crime

Group risk management and compliance programme

The group's programmes to combat financial crime are designed and managed by group anti-financial crime (GAFC) and are implemented in all jurisdictions where the group has business operations.

The functions of GAFC include oversight of the group's measures in respect of:

- Anti-money laundering (AML), counter-terrorist financing (CTF), counter proliferation financing (CPF)
- Forensic investigations into allegations of fraud and misconduct, which includes matters relating to conflicts of interest, bribery, corruption, employee misconduct/dishonesty, as well as issues involving third parties, such as credit/debit card, home loans, insurance and vehicle asset finance cases
- Prevention of the facilitation of tax evasion.

Every country of operation and business unit is responsible for the implementation and maintenance of a risk management and compliance programme (RMCP) in accordance with the group's policies and standards and in line with South Africa's Financial Intelligence Centre (FIC) Act. The RMCP describes the measures that need to be taken to ensure that money laundering, terrorist financing and proliferation financing risks are effectively mitigated. The SBG board is accountable for ensuring compliance with the group RMCP.

Employees take individual responsibility for acting to combat financial crime in all its forms. They must report concerns or incidents internally using appropriate channels, including the group's **anonymous whistleblowing reporting channel**✓. We report suspicious and unusual transactions to the relevant authorities in accordance with local regulatory requirements.

Training

The group requires all employees, board members and contractors to undertake mandatory annual compliance training to ensure awareness of our anti-financial crime policies and processes.

Our goal is to empower all parties with the knowledge to recognise risks, make informed decisions and timeously report any suspicious activity using the appropriate channels.

Target group	Type of training	Frequency of training
All employees and contractors: compliance training	Mandatory compliance training, incorporating behavioural science and scenario-based learning, and assessments to check understanding and competency, including training on regulatory requirements and group policies and processes in relation to AML/CTF, ABC, anti-fraud and prevention of tax evasion. Targeted training is provided when necessary to address specific issues and empower employees operating in areas with a higher risk of being targeted by criminal elements.	**Annual**
Employees: role-specific training	Areas assessed as higher risk receive specialised training. Examples include targeted AML/CTF training for teams in trade finance and in relation to vulnerabilities associated with NPOs/NGOs, and specialised role-specific training in relation to ABC, fraud and tax evasion.	**Annual**
Board members (group and country-level)	Specialised training, online or in-person, including mandatory training on regulatory requirements and group policies and processes in relation to anti-financial crime ABC and anti-fraud.	**Annual**
Third parties	Specific categories of third parties receive mandatory compliance training and, where applicable, role-specific training according to the service they provide and potential associated compliance risk. Third-parties are required to complete anti-financial crime training.	**As required**

We aim to maintain a **minimum 95% completion rate for mandatory training**. We use a dashboard to monitor real-time compliance training completion across all business units. This information is tracked as a risk and conduct KPI. We use data analysis and feedback to continually improve our training and identify areas needing further attention. We also review the outcomes of regulatory inspections to identify and implement improvements to risk management and compliance programmes.

Percentage of group employees completing compliance training in 2024

- **99%** AML/CTF training
- **99%** Anti-bribery and corruption training
- **99%** Role-specific AML training
- **99%** Role-specific tax evasion training
- **8 926** independent service providers undertook training on the Standard Bank independent service provider training portal.

Group financial sanctions, CTF and CPF policy

Our AML, CTF and CPF framework and policies align with FATF Recommendations and statutory and regulatory obligations in all our countries of operation.

Our framework, policies and processes ensure that:

- All reasonable measures are taken to ensure that risks arising from money laundering, terrorist financing, proliferation financing and contravention of financial sanctions are well understood, mitigated, and proactively managed.
- Appropriate levels of client due diligence are applied to mitigate risks effectively. Client identification and verification, and periodic reviews to ensure that client details remain current and accurate, are carried out in accordance with the risk-based approach to compliance. Our client due diligence measures include the requirement to identify and verify the ultimate beneficial owner of all corporate clients, as well as the requirement to have a full understanding of the ownership and control structure of legal entities such as trusts and partnerships.
- We protect the group's reputation and integrity by taking all reasonable measures to prevent the use of its products and services for money laundering and terrorist financing purposes, or for the circumvention of financial sanctions.
- Our client due diligence procedures include screening for sanctioned individuals and entities, and known or suspected terrorists placed on lists issued by applicable competent authorities, e.g. the Office of Foreign Assets Control (OFAC) and the UN.
- We have policies and procedures in place to ensure that all clients that are high risk from an AML/CTF perspective are identified as part of our onboarding processes, including foreign politically exposed persons (PEPs) and local PEPs with adverse media. These clients are subject to enhanced due diligence, and establishment of these relationships is signed off by senior management.
- It is the responsibility of all employees to report suspicious and unusual transactions using group reporting processes and tools, as appropriate.
- We detect, investigate and report suspicious activity and all other reportable transactions to the competent authorities in each jurisdiction of operation.
- As per legislative requirements, we retain all relevant documents for a minimum of five years.
- Our external auditors review our money laundering and terrorist financing risk management processes annually.

AML/CTF legislation is continually evolving. Our operations align their AML/CTF risk management and compliance programmes to these changes as they occur. In support of the responses and actions taken by various governments following grey-listing by the FATF, we continue to monitor FATF activities across SBG jurisdictions and implement applicable enhancement actions.

South African authorities continue to focus on addressing the outstanding action items identified by the Financial Action Task Force to be removed from the FATF greylist. South Africa is now deemed to have addressed or largely addressed 20 of the 22 action items in its Action Plan, leaving two items to be addressed in the next reporting period that runs from March 2025 to June 2025. This would enable South Africa to be considered for delisting from the greylist in October 2025.

Industry initiatives

SBG is part of the steering committee of the South African Anti-Money Laundering Integrated Taskforce (SAMLIT), a public private partnership between accountable institutions, the Financial Intelligence Centre (FIC) and law enforcement authorities. We contribute to the expert working groups on Illegal Wildlife Trafficking, Modern Slavery and Human Trafficking, and Terrorist Financing and Corruption. We chair the expert working group on Narcotics. We also participate in several targeted operations groups, which focus on specific operational matters.

Risk management in relation to third parties

All external third parties performing services on the group's behalf must comply with the group's anti-financial crime policies. Third parties are required to complete AML/CTF training and comply with all AML/CTF requirements.

Account closures

Banks are required by national and international laws to take steps to prevent themselves from being used for the purposes of money laundering, terrorist financing or other unlawful activities. This requires banks to take a risk-based approach to customer due diligence prior to establishing a new relationship with a customer, to conduct enhanced due diligence on high-risk customers such as politically exposed persons, to conduct ongoing monitoring of these customers' transactions to understand the source and application of funds, and to report suspicious transactions to the FIC. Banks are required to have policies, procedures and risk assessment tools in place to govern the closing of a customer's bank account or the exiting of a customer relationship.

SBG continues to ensure that we conduct our business in a way that is not prejudicial against anyone based on their political, racial, and/or any other inclination or affiliation. SBG entities follow lawful and fair processes when determining whether to terminate a banking relationship.

Incidents

In 2024, an administrative sanction of R13 million was levied against The Standard Bank South Africa Limited by the Prudential Authority, after an inspection conducted by the authority in 2022. SBSA fully cooperated with the inspection by the SARB and took immediate remedial action to ensure that it meets all the regulatory requirements set down by the Prudential Authority. The bulk of the findings in respect of which the financial penalty was imposed, relate to the administration of system-generated alerts in 2019, and the submission of regulatory reports within the required deadlines. SBSA has fully remediated the concerns through a comprehensive remediation programme.

It is important to note that these administrative sanctions in no way imply that Standard Bank has been found guilty of facilitating transactions for the purpose of money laundering or terrorist financing.

The bank is committed to transparency in its operations and regularly reports to regulatory authorities. This includes submitting suspicious transaction reports and other required disclosures to the Financial Intelligence Centre and the Prudential Authority. SBSA remains committed to maintaining robust anti-money laundering and counter-terrorist financing controls that protect the integrity of South Africa's financial system.

Anti-bribery and corruption policy

We conduct business with integrity, transparency and openness, and in compliance with applicable laws and our group values and code of ethics and conduct. The group has a zero-tolerance approach to bribery and corruption. We ensure that an anti-bribery and corruption culture is maintained.

We establish and maintain reasonable and proportionate measures to prevent bribery and corruption, and to detect, report, monitor and respond appropriately to any incidents that may occur. We manage our bribery and corruption risk in accordance with local and international statutory and regulatory requirements, while benchmarking our frameworks against global best-practice guidance, such as the OECD's Guidance for Multinational Enterprises, the ISO 37001 International Standard, and guidance issued by the UN and the World Bank.

Our ABC policy applies to all entities and employees of the group, and third parties acting on behalf of the group. It may be supplemented in a local jurisdiction or business area where more stringent legislative or regulatory requirements apply. We provide minimum requirements in respect of ABC controls, including but not limited to aspects such as gifts, entertainment, donations and procurement.

As per the ABC policy:

- All employees are required to adhere to group policies and procedures, and all regulatory requirements to prevent bribery and corruption.
- Every employee must confirm, as part of a survey, that they understand how the ABC policy applies to their roles and responsibilities.
- Employees are required to report any requests for bribes or facilitation payments. Reporting channels include line managers, group forensic services and the group's anonymous **anonymous whistleblowing reporting channel.**✓
  We allow for anonymous reporting. We prohibit victimisation and protect anyone who makes a report in good faith from suffering prejudice.
- Pre-employment screening is conducted prior to the appointment of any employee.
- The giving or receiving of bribes, and the making of facilitation payments by any associated person, is prohibited[1].
- We provide guidance to employees regarding the appropriate response to payments extorted under duress.
- Funding to charitable causes and sponsorships is governed by strict criteria to ensure that such contributions are not used inappropriately by the bank, our employees or third parties to obtain a business advantage.
- We do not provide funding to political parties, except indirectly, through the Democracy Support Programme (which provides funding to South Africa's Independent Electoral Council).
- We monitor the effectiveness of the ABC controls on an ongoing basis, and continually improve the effectiveness of the ABC compliance programme.

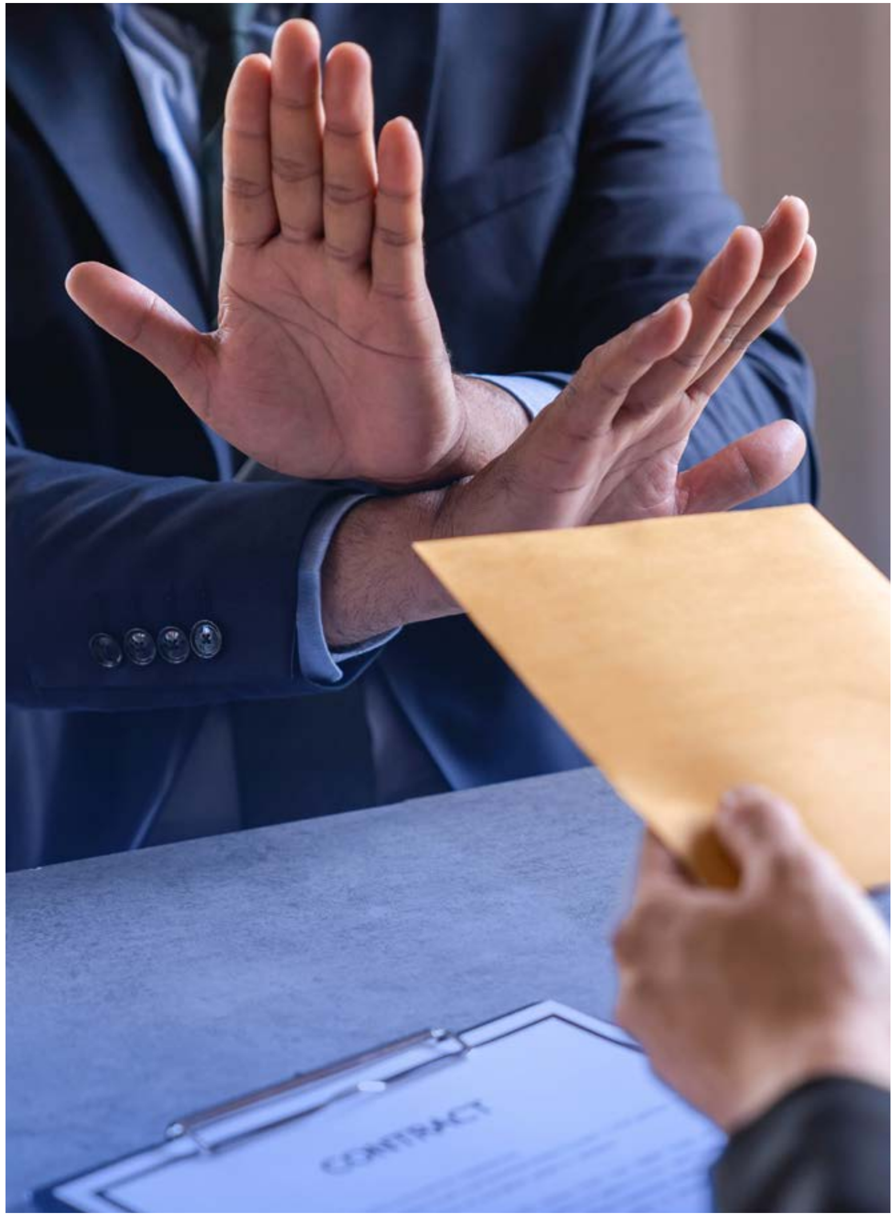
The board is responsible for ensuring compliance with the ABC programme. We conduct periodic ABC risk assessments. All business units and subsidiaries of the group are within scope, with a focus on areas that are perceived to be higher risk. The outcomes of risk assessments, including action plans detailing areas and controls that need to be enhanced, are shared with the board.

Risk management in relation to third parties

- Risk-based due diligence is conducted prior to the appointment of any third-party.
- We inform third parties of our ABC policy requirements.
- We provide ABC training to third parties using a risk based approach.
- Contractual clauses require adherence to relevant anti-corruption legislation by third parties and provide the group with contractual remedies should corrupt activity be detected.
- Third parties can report any concerns or incidents via relationship managers or the **anonymous whistleblowing reporting channel**✓.

Incidents

The group has not been subjected to any kind of legislative or regulatory sanction for bribery and corruption infringements during the last five years.



1 Facilitation payments are usually relatively small payments made to facilitate or expedite routine action by public officials, to which the payer of the facilitation payment has a legal or other entitlement, for example, the issuing of a required permit or licence.

Anti-fraud policy

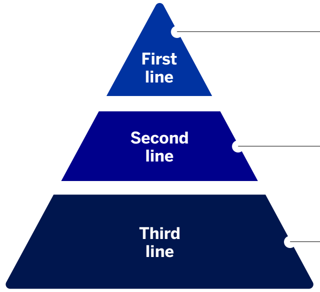
Fraud is defined as unlawful and intentional misrepresentation committed to secure an unfair or unlawful gain. We have zero tolerance for internal and external fraud.

All business units, legal entities and group functions must adopt and implement the fraud risk governance standard and the group anti-fraud policy, including relevant procedures, methodologies and controls, which are fit for purpose to minimise the risk of fraud and must demonstrate active management of fraud risk, through risk and reporting measures.

An always secure environment is a top priority for the group. We continue to invest and prioritise anti-fraud initiatives, including:

- Continuous enhancement of our proactive fraud detection and prevention technologies and capabilities
- Strong authentication methods
- Ongoing awareness-raising for clients and employees through various communication platforms
- A 24/7 fraud reporting platform.

We subscribe to a three lines of defence model in the fight against fraud:



First line: Business is responsible for day-to-day fraud prevention and detection.

Second line: Group risk provides independent oversight, guidance and support to the first line.

Third line: Internal audit monitors and evaluates the group's readiness to manage fraud risks effectively.

All employees and associated persons must report all attempted, suspected and actual fraud. Reporting channels include line managers, the fraud lines, the **anonymous whistleblowing reporting channel✓** or the incentivised FraudStop platform. Employees reporting fraud in good faith are protected from victimisation or suffering any form of prejudice.

Industry initiatives

We collaborate in the fight against fraud by subscribing to and participating in various industry bodies. We share anonymised data with industry risk partners to support the collective detection and proactive prevention of fraud risk incidents and aid in law enforcement. Partners with whom we collaborate include:

- The South African Banking Risk Information Centre (SABRIC)
- The Insurance Crime Bureau (ICB)
- The South African Fraud Prevention Services (SAFPS)
- The International Banking Security Association (IBSA)
- The Association for Certified Fraud Examiners (ACFE).

Risk management in relation to third parties

With the evolution of banking and the move away from traditional distribution channels, third parties play a vital role in the group's daily activities. Our robust third-party risk management programme includes the enhanced due diligence of third parties' fraud risk posture. Third parties are responsible for raising concerns and reporting all attempted, suspected and actual fraud via the reporting channels.

Incidents

The Southern African Fraud Prevention Service 2024 fraud statistics show a 32% increase in reported fraud incidents compared to 2023. Across the industry, banking fraud contributed to 45% of these incidents, followed by the microfinance sector at 19% and retail at 14%. SBG's risk policies, frameworks and governance, supported by digitised reporting mechanisms, ensure up to date fraud incident reporting to internal risk committees, external regulatory bodies and to relevant police authorities. We remain committed to increasing fraud awareness among our customers, through channels including in-app messages, Internet banking banners, emails, social media, and shopping mall activations. These efforts empower clients with essential information to stay safe while banking. Consumers can also keep up to date on the latest scams on the Standard Bank's Bank Security Centre Scams page or the South African Fraud Prevent Services scams awareness pages.

Prevention of the facilitation of tax evasion (PFTE) policy

The group has a zero-tolerance approach to the facilitation of tax evasion. Our PFTE policy ensures that reasonable procedures to prevent the facilitation of tax evasion are in place. The SBG board is ultimately accountable for ensuring compliance with the group's PFTE policy and processes.

We conduct periodic risk assessments, monitor the relevant controls and institute appropriate responses to the outcomes of monitoring processes. All allegations of facilitation of tax evasion are investigated and actioned. We raise awareness of our facilitation of tax evasion policy and processes with our employees, clients, suppliers and service providers through explicit clauses in relevant agreements. The bank’s employees are not permitted to provide tax advice. Employees undergo compliance training on our PFTE policies and processes.

All employees are required to:

Identify transactions considered as higher risk for tax evasion and refer these to the corporate offences team (within group financial crime compliance) and group tax for consideration.

Report suspicion of the facilitation of tax evasion to group forensic services. Concerns can also be reported via the group’s anonymous **whistleblowing reporting channel**✓.

File a suspicious transaction report (or suspicious activity report) where tax evasion or the facilitation of tax evasion is suspected or identified.

Risk management in relation to associated persons

- Risk-based due diligence is conducted prior to the appointment of any third party.
- Specific contractual clauses regulate adherence to relevant tax legislation by third parties of the group and provide the group with contractual remedies should such activity be detected.

Incidents

The group has not been subjected to any investigation or regulatory sanction for facilitation of tax evasion during the past five years.

Procurement and third-party relationships

The group procures a wide range of third parties to provide goods and services. Significant outsourcing engagements include cash handling services, premises-related services and mobile network providers.

Procurement policy

Standard Bank's procurement policy is based on the group's code of ethics and conduct, and the principles of value optimisation, fair and effective competition, accountability, sustainability and risk management. It provides guidance on the sourcing and selection of suppliers and ensures that procurement processes are conducted in line with sound corporate governance principles. We strive to procure goods and services that minimise negative impacts on the environment and communities and protect the health and safety of workers. In line with our commitment to drive business growth and job creation, we encourage and promote procurement from local suppliers, while ensuring alignment with group standards of quality, sustainability and commerciality. We are progressing on integrating ESG considerations into our procurement processes, in line with the group's sustainability objectives and emerging regulatory requirements.

IT spend constitutes 37% of the group's annual procurement spend. Our IT partners demonstrate a strong focus on responsible innovation to ensure ethical and inclusive deployment of technology. Our largest IT third parties are committed to becoming carbon negative, water positive and zero waste. They monitor and report on their environmental and social impact, including their efforts to reduce scope 1, 2 and 3 emissions, design for circularity to minimise waste, reducing water use and replenishing more water than they consume in their datacentre operations. These commitments align with SBG's sustainability goals.

Enterprise and supplier development

In South Africa, we actively support the participation of black-owned SMEs (BSMEs) in our value chain, through our enterprise and supplier development programme. Support includes:

Access to finance

funding solutions to support BSMEs to deliver on existing contracts and grow their businesses. This includes credit facilities at preferential rates, our provincial government purchase order solution (for SMEs with provincial government contracts), solutions for small-scale black farmers, supplier development loans for SMEs in SBSA's value chain, and grant funding.

Access to business development

including business management skills and technical training. We provide mentorship and coaching tailored to individual business needs, and bespoke development initiatives for suppliers to meet contract deliverables, including relevant certification.

Access to markets

including procurement opportunities in our value chain. Our preferential procurement policy provides guidelines and governance for supplier selection during procurement. We support enterprise development participants to graduate to supplier development and access preferential procurement and set-aside opportunities. We also enable access to broader opportunities through strategic partnerships with our first and second tier suppliers.

We are committed to supporting SMEs through strategic spending, with significant annual budget allocations for EMEs and QSEs. Our efforts to foster a diverse and inclusive supplier base include ensuring that our supplier panels require full B-BBEE compliance, and include supplier development programme participants, small enterprises and new businesses.

We are actively working to support the development of the IT skills that we will need in the future, partnering with BSMES to build a sustainable pipeline of suppliers to meet our strategic requirements. We have selected a range of SMEs to participate in a skills development programme during 2025. Participants will be included in SBG's IT Academy.

Enterprise development in 2024 (SBSA)	
ESD participants	**2 114 536 Black women-owned 179 youth-owned**
New active business banking accounts	**467**
ED disbursements	**R137 million**
Number of jobs created and supported	**3 263**

Examples of programmes: Basali Development Programme; Ryze Development Programme (Kopano); GPG Township Development Programme; Agribusiness Transformation Programme (FS); Western Cape Accelerator Programme; Standard Bank and GIBS Youth Business Programme; Future Families/Co-Space Programme; SIL Masterclasses, Roofing and Waterproofing Academy; Salesforce Launchpad Regional initiatives (SEDA partnerships, Business Awards, township stores rebranding), Sebenza Development Programme.

Supplier development in 2024 (SBSA)	
Participants	**132**
Participants with active contracts with SBSA	**67%**
Procurement spend with supplier development participants	**R723 million**
Growth in procurement spend with supplier development participants	**20%**
Credit facilities extended to SD participants	**R192.9 million**
Supplier Development jobs created	**6 313**
Number of supplier development participants receiving business development support	**132**
Supplier Development B-BBEE Score	**4.76 out of 7 points + 2 out of 4 bonus points for job creation and graduation from ED to SD**
Enterprise Development B-BBEE Score	**3 out of 3 points, with 0.13 bonus points for job creation and the use of black fund managers**

Enterprise and Supplier Development Qualifying criteria:

51% or more black owned (South African, African, Coloured, Indian, SA-Chinese) with a valid B-BBEE certificate	Trading within South Africa and the majority shareholder is a black South African citizen	EME or QSE i.e. total annual revenue <R50 million	Supplier Development: An active supplier on Standard Bank's supply base, with current spend allocated by SBSA (Tier 1) or a supplier to a supplier of SBSA (Tier 2)

Preferential procurement (SBSA and Liberty)

	Number of suppliers	Rand value	% of TMPS
2024 TMPS	**26 970**	**R30 billion**	**100**
B-BBEE compliant suppliers	**16 744**	**R26 billion**	**87**
Black-owned suppliers	**7 445**	**R11 billion**	**37**
Black women-owned suppliers	**3 368**	**R8 billion**	**27**
Exempt micro enterprises	**14 037**	**R4 billion**	**13**
Qualifying small enterprises	**1 174**	**R4 billion**	**13**
Preferential Procurement B-BBEE Score[1]	**19 (15 + 4 bonus points)**		

1 This element of the scorecard measures weighted preferential procurement spend for seven categories: B-BBEE compliant suppliers, black women-owned suppliers, black-owned suppliers, exempt micro enterprises, qualifying small enterprises, black-owned designated group and black-owned professional service providers.

Third-party risk management

Our third-party risk management framework incorporates regulatory requirements, internal policies and the group code of ethics and conduct. It ensures a consistent standardised approach to third-party risk management across the group. The group supplier risk committee reviews third-party reputational risk matters relating to ethics, conduct, conflicts of interest, anticompetitive behaviour, human rights and bribery and corruption.

We require all third parties to follow responsible environmental and social practices, relevant to their sector or the products and services supplied. All suppliers, consultants and contractors to the group are required to comply with all applicable environmental and social legislation and to follow internationally accepted environmental and social practices as these apply to their sector and to the goods or services supplied.

We require all third parties to acknowledge **SBG's third-party code of conduct**, which is based on the group code of ethics and conduct, or to attest that their company has a code of conduct aligned to the SBG requirements. The code aims to ensure that all third parties who engage with the group are aware of our minimum requirements and governing principles in relation to ethical conduct. The code requires all our third parties to respect basic human rights, promote the health and safety of workers and establish a clean and safe working environment. This includes:

- Ensuring all health and safety laws and regulations are adhered to in the workplace
- Ensuring vulnerable categories of workers, such as migrant workers, are protected
- Regulating working hours
- Paying appropriate wages
- Not allowing forced labour, child labour or discrimination
- Respecting everyone's freedom of association.

We engage third parties on an ongoing basis to actively manage potential risks and third-party performance. All third parties are required to comply with our anti-financial crime requirements. Protection of information is included in all aspects of our third-party risk management framework. Data protection and data privacy clauses are included in contract agreements with third parties. Where third parties provide digital solutions, they must ensure security requirements are met, in line with the cyber resilience standard. Contracts also include a 'Right to Audit' clause, allowing for periodic assessments of the third parties. Disciplinary or legal action may be taken against any third parties who do not comply with group information risk and cyber risk policies.

We strive to ensure that the products and services we procure minimise the risk of social or environmental harm. Our risk assessment process includes determination of whether a third party will provide a service that potentially risks harming the health and safety of persons, or directly impacting or harming the natural environment. If such risks may be present, the third-party:

- Is required to complete a detailed risk assessment and due diligence process, which assesses potential social and environmental risks and impact
- May, depending on type risk identified, be asked to provide evidence of the policies and practices they have in place to mitigate such risks. The nature of information required is dependent on the nature of the risk, the type of product or service and the type of relationship.

Our group-wide digital solution provides automated real time due diligence on third parties. We undertake daily screening of third parties for adverse matters, with a focus on human rights, environmental issues, corruption, fraud and money laundering. Relevant employees have received training on the system, including the onboarding process for third parties.

We are working toward leveraging additional continuous monitoring tools to better understand and identify ESG risks associated to our third parties and their supply chains. We aim to ensure we can continuously manage, monitor and mitigate these risks by providing our third parties with the necessary support to achieve their sustainability goals and support the achievement of SBG's sustainability goals. We are enhancing our third-party risk questionnaire to support this commitment. This includes assessment of risks arising from climate change as they relate to third parties' operational activities. We are committed to understanding our third parties' climate and sustainability progress, and to supporting them to reduce their GHG emissions.

Our third-party contracts specify that Standard Bank may, by notice, immediately terminate an agreement if we determine that the third-party has acted dishonestly or in bad faith in respect of the agreement; has engaged in any activity which may negatively affect our reputation; has offered, promised or made any gift or bribe to solicit any favour; is involved with any prohibited activity; or has made any intentional or negligent misrepresentation to Standard Bank.

Engagement with third parties on ESG issues

SBG's target to achieve net-zero for our operational (scope 1 and 2) emissions by 2040 depends in part on emissions reduction by key suppliers and service providers. We are engaging with critical third parties, including those who supply and maintain electricity, diesel, real estate and data centre operations for SBG, to assess opportunities to reduce their emissions and ensure that climate-related data is accessible as needed. Our focus is on the countries that we have identified as most critical to deliver on the group's net-zero targets, namely South Africa, Nigeria, Mozambique, Botswana, Namibia, Zimbabwe and Angola. Initiatives include improving data, reducing energy consumption, and expanding renewable generation.

Tax

Governance

Standard Bank is committed to high standards of governance, full compliance with the spirit and letter of tax laws and full disclosure to tax authorities in terms of our statutory obligations.

Our group board is ultimately responsible for the group's tax matters and governance, including oversight of reporting on income, tax expenses, the management of tax risk and setting the group's tax risk profile.

This responsibility is delegated to the group audit committee, which is responsible for approving the group's tax strategy which directs our approach to tax matters. The group audit committee receives regular updates on the group's tax position. Our tax strategy is updated and approved by the group audit committee at least every second year, to ensure we respond effectively to any changes to group strategy.

The group chief finance & value management officer (CFVO) and the group head of tax, with support from the tax function, are responsible for executing the mandate from the board. The tax governance standard sets out the roles and responsibilities of the tax function and other business and support areas in the group to ensure that corporate governance, compliance and tax risk management requirements are met.

The group tax governance standard and supplementary group tax policies are localised and approved at the various subsidiary boards and/or the internal financial control committees across the group. The supplementary tax policies deal with specific aspects of tax risk such as transfer pricing, indirect taxes, withholding taxes, remuneration-related taxes and client tax reporting. The group's tax governance standard, and all other tax policies/standards are updated at least every second year to ensure alignment with the group's tax strategy and regulatory changes.

Standard operating procedures (SOPs) ensure that our approach to tax is well embedded and compliance obligations are effectively monitored. The SOPs are continuously updated to respond to changes in the business or applicable legislation. They are approved and attested by the CFVO of each country, on a quarterly, biannual and/or annual basis to ensure compliance. All tax governance documents are available through a central repository to relevant employees.

Our tax strategy is designed to provide transparency and support our business strategy and is aligned with our corporate vision and values as set out in our Code of Ethics and Conduct. We support only bona fide commercial transactions with a business purpose and economic substance.

The group contributes significantly to government revenues by way of corporate income taxes and indirect taxes such as value-added tax (VAT). We also collect other taxes such as withholding tax and employees' tax on behalf of revenue authorities and assist tax authorities with tax administration, tax collection processes and by obtaining independent verification of third-party data as well as reducing tax fraud.

We play an instrumental role in the development and growth in the economies in which we operate. This is reflected in the compensation and benefits we provide our employees, dividends paid to our shareholders and investments we make in our communities.

Our approach to taxation

We commit to the following **fundamental principles**, as contained in our tax strategy:

Compliance

We are committed to ethical outcomes and accurate, transparent and timely compliance with the tax laws of the countries where we operate.

Clients

We embrace the Standard Bank strategy which focuses on client centricity and ensure that all client tax reporting to tax authorities and to clients are accurate, complete, timely and in a user-friendly format to comply with all regulations across the group.

Shareholder value

We maximise sustainable shareholder value by undertaking legitimate and responsible tax optimisation in line with the spirit and purpose of, and complying with all relevant laws, rules and regulations.

Tax planning

We only engage in transactions that have commercial and economic substance and do not carry the prospect of material reputational risk.

Cross-border related party transactions

We apply the OECD transfer pricing guidelines for purposes of ensuring compliance with the arm's length principle. This requires that related parties agree to transact under the same terms and conditions which would have been agreed between non-related entities for comparable uncontrolled transactions.

Tax advice

We do not provide tax advice to clients or counterparties.

Prevention of the facilitation of tax evasion

The group has no tolerance for any of our employees or any person or entity acting on our behalf to be involved in or implicated in any way in bribery or any corrupt practice, including the facilitation of tax evasion.

Tax havens

The group operates in jurisdictions that may be defined as tax havens for commercial and not tax reasons. Our commercial operations in low tax jurisdictions (Isle of Man, Jersey and Mauritius) have substance and are subject to controlled foreign company legislation that is applicable in South Africa.

Identifying, managing and monitoring tax risks

We manage our tax risks by:

- Evaluating compliance with our tax risk control framework by performing tax risk self-assessments every second year, following a risk-based approach. Any material shortcomings and required actions are reported to the group audit committee
- Using tax compliance trackers that indicate late or non-filing of tax returns and/or late or non-payment of taxes
- Ensuring tax compliance reviews form part of all internal audit reviews where appropriate. Any material operational tax risk is tracked at the relevant IFC committee and/or managed as part of the non-financial risk taxonomy under the enterprise risk management framework to ensure shortcomings are timeously resolved
- Providing continuous tax and VAT training and guidance to business
- Ensuring employees in the tax function have the required skills and qualifications
- Obtaining external tax opinions from senior counsel or an external tax adviser where the tax treatment of a transaction is uncertain or applying for an advanced tax ruling from the tax authorities
- Monitoring adherence to the SOPs and relevant CFVO attestations and reporting any shortcomings to the internal financial control committee and other relevant risk committees
- Ensuring tax function review of any new product, business venture, operating model change, process or procedure, or significant changes thereto, and of any transaction affecting the legal entity structure of the group to ensure compliance with all tax regulations
- Continuously reviewing and enhancing our tax systems, control environment and processes
- Supporting business to deal with any client queries relating to client tax reporting as well as engaging directly with clients to solve tax reporting concerns
- Reporting material non-financial risk tax matters to the group's risk management team for evaluation and monitoring, to resolve any shortcomings.

Engaging with tax and regulatory authorities

We are committed to fostering transparent, constructive and cooperative relationships based on open and honest disclosure and building mutual trust wherever possible.

- We engage in full, open and early dialogue with tax authorities on a regular basis to discuss relevant tax matters and to achieve certainty, where possible, over tax positions.
- We attend tax authority and National Treasury/regulator workshops to engage on policy and technical amendments.
- We submit comments and recommend tax proposals and/or policy changes aimed at enabling conducive tax environments via in-country banking associations and other relevant industry forums.
- Where disputes occur, we manage these professionally.
- We support the fundamental principles underlying multilateral moves toward greater transparency.
- We partner with tax authorities to find solutions that assist our clients and the group to make tax compliance easier.

2024 highlights

- We participated in the ASISA regulatory workgroup, ASISA product tax workgroup and chaired the ASISA tax administration workgroup, helping to ensure the workability of two-pot retirement savings legislation introduced by National Treasury and SARS
- We engaged on the retention of fund members' rights, a reasonable implementation date, an appropriate value of seed capital (to preserve fund benefits) and SARS data requirements for tax directive changes. This led to a smooth transition for fund members, retirement funds and administrators, enabling seamless implementation across the group
- South Africa has legislated the Global Minimum Tax regime, effective for years of assessment beginning on or after 1 January 2024. SBG will submit the required return within the 18-month period allowed by the legislation
- The Standard Bank Offshore tax function engaged with the Isle of Man and the Jersey National Treasuries on the modelling and drafting of domestic Pillar 2 (Global Minimum Tax) legislation, approved for implementation from 1 January 2025
- We continue to engage with SARS on tax technology, focusing on collaboration between SARS and the banking industry on the use of Application Programming Interface (API), robotics and potential synergies regarding how technology is released and updated via the SARS e-filing platform
- We continue to participate in engagements between BASA and National Treasury regarding changes to income tax legislation to ensure alignment of the tax treatment of capital regulatory notes. This includes engagement on Flac instruments (unsecured subordinated debt instruments), to ensure that larger banks can absorb losses and be recapitalised without the need for taxpayer-funded bailout. The SARB issued a Draft Prudential Standard on Flac with the phase-in period proposed to commence on 1 January 2025.

Insights into our group-wide tax contributions

We file an annual Country-by-Country Reporting (CbCR) return to the SARS. Owing to the large number of legal entities in the group, here we provide a summary of this information at a regional level. Regions comprise:

- South Africa
- West Africa: Angola, Democratic Republic of Congo (DRC), Ghana, Côte d'Ivoire and Nigeria
- East Africa: Kenya, South Sudan, Tanzania and Uganda
- South and Central: Botswana, Eswatini, Lesotho, Malawi, Mauritius, Mozambique, Namibia, Zambia and Zimbabwe
- Offshore and International: China, Isle of Man, Jersey, United Arab Emirates, United Kingdom, and the United States of America.

Taxes paid/incurred

(taxes that are charged to the company's profit and loss account)

Tax paid/incurred by region (Rm)

Total value R21 590 million

	2024
South Africa	**11 462**
West Africa	**1 793**
East Africa	**3 353**
South & Central Africa	**4 325**
Offshore and International	**657**

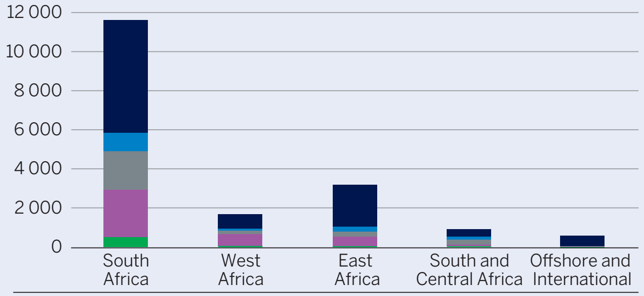
Tax paid/incurred by tax type (Rm)

Total value R21 590 million

	2024
Corporate tax[1]	**13 957**
Withholding tax[2]	**2 050**
Indirect tax[3]	**3 791**
Payroll tax[3]	**1 069**
Other tax[3]	**723**

Tax paid/incurred by region by tax type (Rm)

Total value R21 590 million



	South Africa	West Africa	East Africa	South and Central Africa	Offshore and International
Corporate tax[1]	6 927	1 139	2 366	2 903	622
Withholding tax[2]	869	129	335	717	–
Indirect tax[3]	2 572	309	320	567	23
Payroll tax[3]	457	189	296	115	12
Other tax[3]	637	27	36	23	–

Taxes collected

(taxes that the company collects and administers on behalf of the government that do not impact profit and loss)

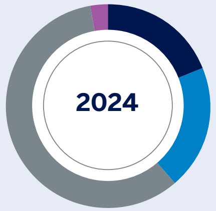
Tax collected by region (Rm)

Total value R30 490 million

	2024
South Africa	**20 100**
West Africa	**2 548**
East Africa	**2 333**
South & Central Africa	**4 380**
Offshore and International	**1 129**

Tax collected by tax type (Rm)

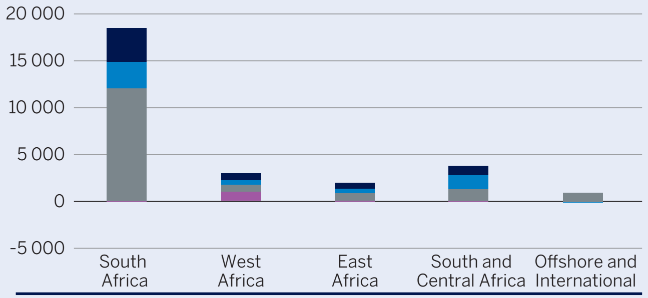
Total value R30 490 million



	2024
Withholding tax	**5 774**
Indirect tax	**6 064**
Payroll tax	**17 844**
Other tax	**808**

Tax collected by region by tax type (Rm)

Total value R30 490 million



	South Africa	West Africa	East Africa	South and Central Africa	Offshore and International
Withholding tax	3 100	695	875	1 104	–
Indirect tax	3 184	445	480	1 982	(27)
Payroll tax	13 816	639	949	1 284	1 156
Other tax	–	769	29	10	–

1 Taxes paid.
2 Taxes incurred (taxes that are charged to the company's profit and loss account).
3 These taxes are presented on an accrual basis.

Country-by-Country Reporting information

SARS is responsible for implementation of the CbCR Standard for Multinational Enterprises (MNEs) in South Africa. Each 'ultimate parent entity' of a MNE group that is resident for tax purposes in South Africa must file a CbCR return with SARS if the total consolidated group revenue amounts to R10 billion or more for the previous Reporting Fiscal Year.

Standard Bank Group Limited is the ultimate holding company of the Standard Bank Group and has filed an annual CbCR return since 2016. We are fully compliant and transparent in our annual CbCR obligations. In the **2023 financial year return**, the group provided relevant CbCR information pertaining to **251** legal entities (including Liberty). Due to the large number of entities in the group, a pragmatic approach is followed in terms of our disclosure in this report to provide stakeholders with relevant subsidiary information at a regional level. Our commercial operations in low tax jurisdictions (Isle of Man, Jersey and Mauritius) are purposefully positioned to serve our customers and are subject to controlled foreign company legislation that is applicable in South Africa.

Standard Bank Group predominantly subscribes to the OECD based interpretations for CbCR metrics. Accordingly, CbCR does not fully correlate to our annual financial statements prepared on an IFRS basis. Revenue for the group thus comprises net interest income (NII) and non-interest revenue (NIR). Revenues reflected below are split between related party revenues and unrelated party revenues, implying an unavoidable duplication relevant to related party revenue reporting.[1]

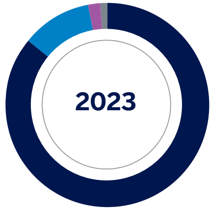
Revenue calculations exclude payments received from other constituent entities that are treated as dividends in the payor's tax jurisdiction, in accordance with OECD guidance.

1 This metric provides a useful insight into the movement of money between legal entities within a particular jurisdiction. However revenues earned from a third-party in one jurisdiction (classified as unrelated party revenues) may in turn be used to make a payment in the form of a 'revenue-share' to a related party in another jurisdiction. Such revenues will, in turn, be reported within the classification of related party revenues in the recipient jurisdiction. This related party revenue is not incremental but represents the same flow that has already been accounted for in the first country's unrelated party revenue. Further information is available on request.

The information that follows reflects our 2023 financial year information, which is aligned to the latest submission made to SARS.

Primary activities in relation to unrelated party revenue

(Rm)



	million	2023
Regulated financial services	244 419	86%
Other	30 827	11%
Insurance	6 006	2%
Holding shares or other equity instrument	2 454	1%

Legal entities by region

	million	2023
South Africa	125	50%
South and Central Africa	44	17%
Offshore and International	31	12%
East Africa	27	11%
West Africa	24	10%

Number of employees by region[1]

	million	2023
South Africa	34 569	68%
South and Central Africa	6 862	13%
West Africa	4 930	10%
East Africa	3 829	8%
Offshore and International	677	1%

Third-party revenue by region

(Rm)

	million	2023
South Africa	191 783	67%
South and Central Africa	28 455	10%
Offshore and International	24 346	9%
West Africa	23 450	8%
East Africa	15 988	6%

[1] The number of employees include the number of full-time equivalent employees at the end of the year and excludes all non-permanent contractors, brokers, agents and financial advisers.

Intra-group transactions by region[2]

(Rm)

	million	2023
South Africa	8 040	52%
South and Central Africa	2 480	16%
Offshore and International	2 372	16%
West Africa	2 075	14%
East Africa	264	2%

Profit (loss) before income tax by region

(Rm)

	million	2023
South Africa	24 451	37%
South and Central Africa	16 425	24%
West Africa	11 251	17%
Offshore and International	8 073	12%
East Africa	6 494	10%

Tangible assets other than cash and cash equivalents by region

(Rm)

	million	2023
South Africa	28 731	76%
South and Central Africa	3 987	11%
West Africa	3 105	8%
East Africa	1 181	3%
Offshore and International	581	2%

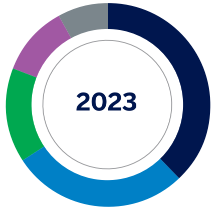
Income tax paid on a cash basis by region

(Rm)

	million	2023
South Africa	7 849	53%
South and Central Africa	3 137	21%
East Africa	1 927	13%
West Africa	1 586	11%
Offshore and International	278	2%

Income tax accrued by region

(Rm)



	million	2023
South Africa	5 804	38%
South and Central Africa	4 200	28%
West Africa	2 362	15%
East Africa	1 698	11%
Offshore and International	1 252	8%

2 Owing to the reporting of revenue being based on net interest income and non-interest revenue, in some cases it is possible that revenue from related parties may reflect a negative number (i.e. the interest expense/non-interest expense from transactions with related parties may have been greater than the interest income/non-interest income from transactions with such related parties). To accurately depict the level of related party activity, absolute values have been used for the region(s) with a negative total related party revenue. As a result, the total related party revenue depicted here will not be the same as that reported in the CbCR return.

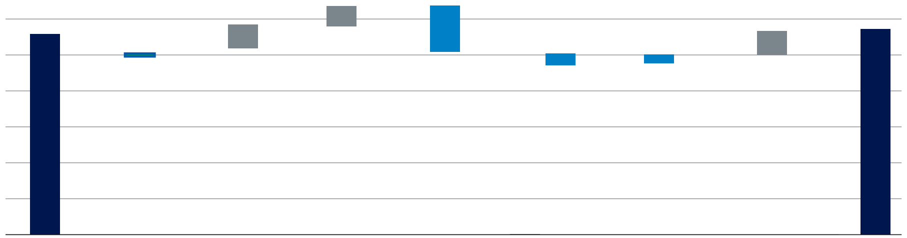
Effective tax rate reconciliation

The graphs below represent the reconciliation between the corporate income tax accrued on profit/loss and the tax due if the statutory tax rate is applied to profit/loss before tax.

The effective tax rate represents the total direct tax accrued in the income statement as a percentage of net profit before direct tax. The total direct tax accrued in the income statement comprises current and deferred tax, and, as a result, cash taxes paid is not a representation of the total direct tax expense. The effective tax rate will differ from the statutory tax rate when tax legislation deems certain income and expenses non-taxable or non-deductible when calculating the tax expense or credit for the entity.

Effective tax rate reconciliation

South Africa (%)

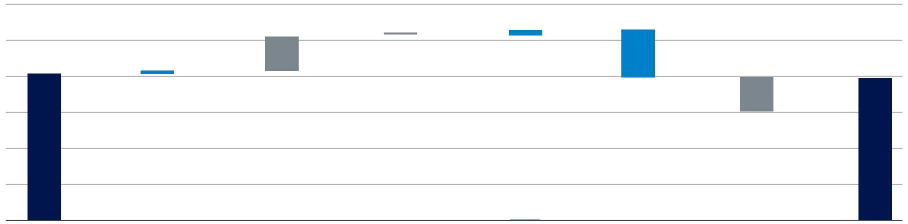


Statutory tax rate	Prior year tax	Capital gains tax[1]	Foreign tax and withholding tax	Non-taxable dividend income	Non-taxable interest – government bonds and other	Other non-taxable income	Non-deductible expense and other	Effective tax rate
27.0	0.5	3.5	3.0	6.6	1.4	0.8	3.4	27.6

[1] Capital gains tax (CGT) primarily attributable to Liberty's policyholder tax funds, as a result of the fair value adjustments (both realised and unrealised) of certain equities and bonds subject to CGT.

Effective tax rate reconciliation

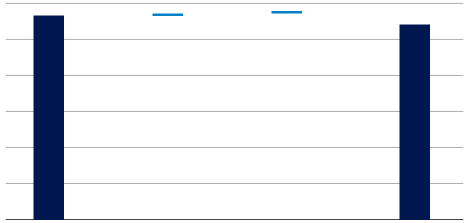
South and Central Africa (%)



Statutory tax rate	Prior year tax	Foreign tax and withholding tax	Change in tax rate	Non-taxable dividend income	Non-taxable interest - government bonds and other	Non-deductible expenses and other	Effective tax rate
27.6	1.3	5.0	0.1	1.2	7.5	4.9	27.6

Effective tax rate reconciliation

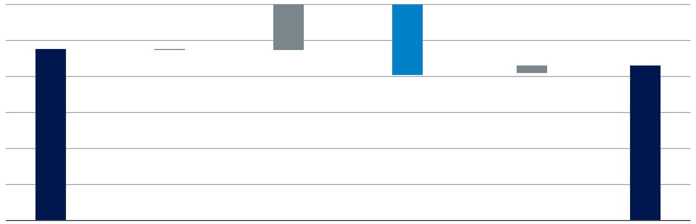
International and offshore (%)



Statutory tax rate	Change in tax rate	Other non-taxable	Effective tax rate income
10.3	0.3	0.1	9.9

Effective tax rate reconciliation

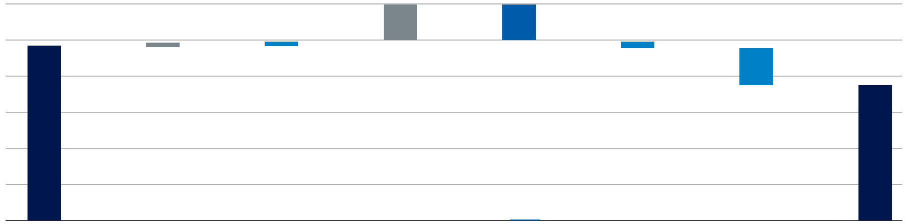
East Africa (%)



Statutory tax rate	Prior year tax	Foreign tax and withholding tax	Non-taxable interest – government bonds and other	Non-deductible expense and other	Effective tax rate
30.0	0.2	4.6	8.2	1.7	28.3

Effective tax rate reconciliation

West Africa (%)



Statutory tax rate	Prior year tax	Non-taxable dividend income	Foreign tax and withholding tax[1]	Non-taxable interest – government bonds and other	Other non-taxable income	Other[2]	Effective tax rate
30.4	0.1	0.1	10.8	10.8	0.7	3.5	26.2

1 Increase in foreign and withholding taxes in Africa regions, which includes the impact of windfall tax levy in Nigeria.
2 Comprising mainly of the full utilisation of the previously unrecognised assessed tax losses in Nigeria.

4

DATA SECURITY, PRIVACY, CYBERSECURITY AND RELIABILITY OF DIGITAL CHANNELS

INFORMATION SECURITY, DATA PRIVACY AND CYBERSECURITY | RELIABILITY OF DIGITAL CHANNELS

Information security, data privacy and cybersecurity

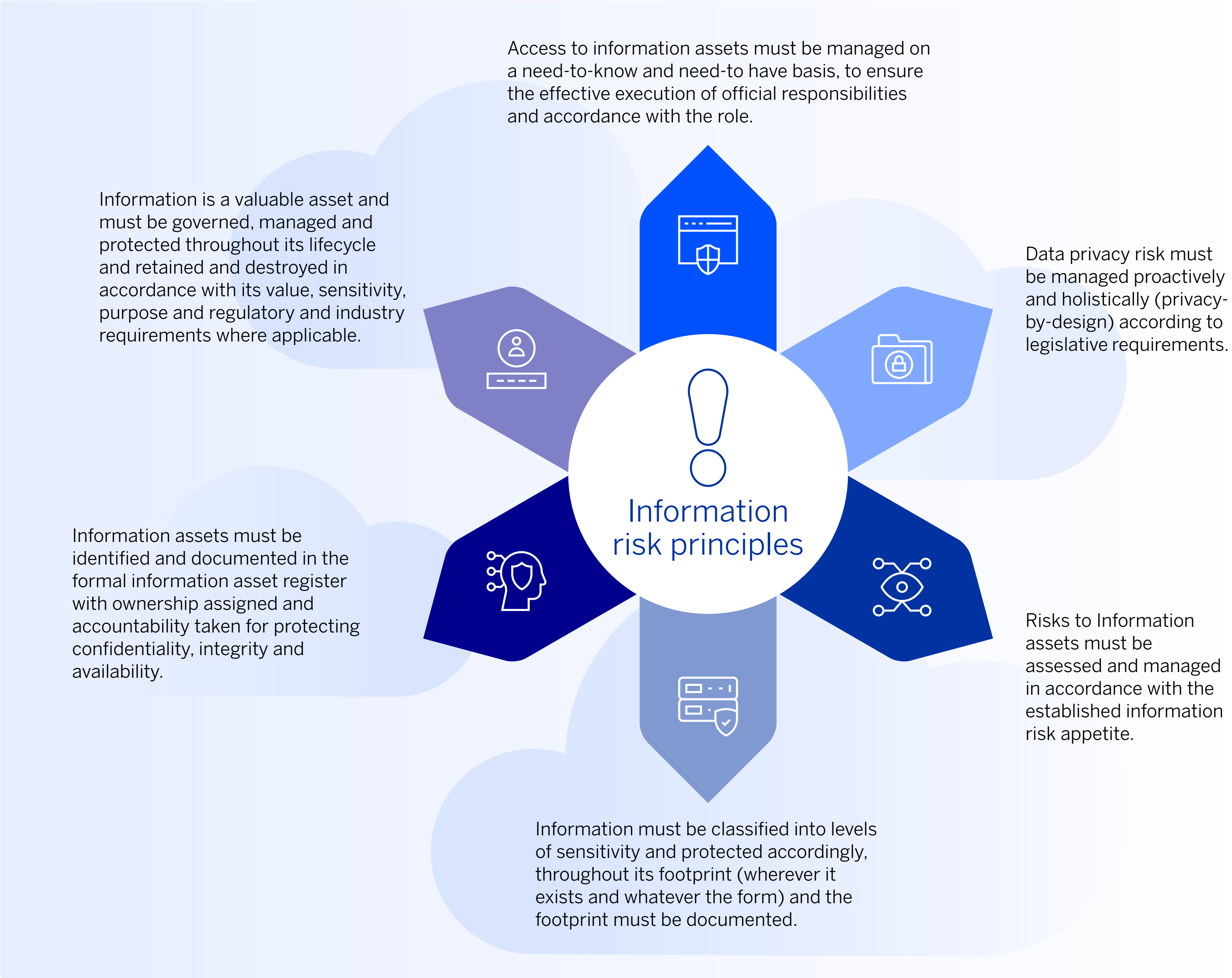
Our ability to do business depends on the integrity of the group's data and information assets and the protection of client privacy. We invest in people, processes, technology and organisational controls to safeguard our information assets.

This requires effective management of information risk, cyber risk, data privacy, technology risk and third-party risk.

- We protect the personal information of all our data subjects including our clients, third parties and employees.
- We prioritise data privacy rights as a fundamental human right and apply robust processes to give protection to this right.
- We promote a culture of accountability, where all employees understand and commit to their information risk management responsibilities.
- We do not share confidential or sensitive information with unauthorised people or competitors.
- We have zero tolerance for unlawful information processing activities.
- We ensure acceptable risk exposure from our third parties by assessing their compliance with group minimum requirements.

Definitions

Information risk:	Data privacy risk:	Cyber risk:
Risk of accidental or intentional unauthorised use, access, modification, disclosure, dissemination or destruction of information resources, which would compromise the confidentiality, integrity and availability of information and which would potentially harm the business.	Risk of accidental or intentional compromise and/or unlawful processing of personally identifiable information at any point during its lifecycle, which would potentially cause harm to the business and/or data subject.	Risk of an attacker infiltrating bank's systems, attack on internet facing services, infection by malicious code/ malware for financial gain, either direct (through cash out attacks) or indirect (through stolen/ compromised data or extortion).



Data privacy principles

We are committed to protecting the personal information of clients, third parties and employees. We apply robust processes to give effect to the right to privacy. Our data privacy approach incorporates the requirements of all relevant privacy legislation and regulation and industry standards and codes across our countries of operation.

This includes:

- General Data Protection Regulation (GDPR)
- South Africa's Protection of Personal Information Act (POPIA)
- Data Privacy and Promotion of Access to Information Act (PAIA)
- The Code of Banking Practice.

Legislative and regulative requirements per jurisdiction are identified and embedded into applicable risk management processes.

We adhere to the following **principles** when processing personal information:

- Privacy is top of mind in all our business activities and projects and remains our responsibility.
- We always keep our customers informed and ensure they know what personal information we need, and why we need it.
- We do not process customers' personal information beyond the purpose for which we originally collected it.
- We only collect the personal information that we need, we collect it lawfully and process it based on the lawful grounds provided by legislation.
- We empower and enable our customers to access and update their personal information at any time. Requests from data subjects to amend or delete their personal information may be made via our customer service channels or directly to the information officer.
- We treat the personal information we collect through our various channels as private and confidential. Our privacy statement and cookie notice apply when using these channels.

The Standard Bank Group privacy statement addresses the requirements of the various jurisdictions in which we operate. **The SBSA privacy statement** incorporates national legislative and regulatory requirements. Both statements provide clarity for data subjects (including clients, prospective clients and third parties) in terms of how we use, respect and treat personal information; and how they may exercise their rights in relation to their personal information.

Governance

SBG BOARD

Group information technology board committee

- Oversees technology strategy, information security and cybersecurity capabilities
- Ensures prudent and reasonable steps are taken to govern technology and information in line with the King IV principles
- Receives quarterly updates from management committees on the group's technology landscape, skills and capabilities, system stability and resilience, digitisation strategy, technology risk, information risk and cyber risk
- Obtains independent assurance of the group's cyber resilience controls through internal and external audits
- Mandates biannual assessments of the cyber strategy by global cybersecurity experts. The most recent assessment was concluded in March 2024.

Management committees

(receive monthly reports from business, report quarterly to the board)

Group Technology Executive Committee

- Technology Architecture Governance Committee
- Group Technology Risk and Compliance Committee
  - Group Logical Access Management Committee
  - Cyber Risk Strategy Committee
  - Group Patch Steering Committee

Group Risk Oversight Committee

- Group Non-Financial Risk Committee
  - Information Risk Steering Committee

SBG code of ethics and conduct requires all employees to protect the confidentiality of client information, protect group intellectual property and disclose information on intellectual property to relevant parties on a need-to-know basis only.

Enterprise-wide risk management framework incorporates cyber and information risk types as material risks to be managed.

Data Governance Framework guides the implementation of data governance including governance of data management in the group.

Information risk governance standard sets out minimum group requirements for information risk management, including data privacy risk. Ensures a holistic approach to managing information risk and between interconnected risk types, including cyber risk and technology risk.

Cyber resilience standard defines roles and responsibilities for managing cyber risk, enabling the organisation to prepare for, respond to, and recover from any possible cyber threats or attacks and enables accurate measurement and reporting of the status of cybersecurity controls.

Information risk policy sets out principles and minimum requirements to manage risk to all types of information assets, in all formats, owned by or entrusted to the group throughout the information lifecycle. It applies to all employees and third parties.

Group data privacy operating standard provides uniformity across the group in terms of the treatment of personal data and rules applicable to processing of personal data across all jurisdictions. It also applies to the processing of all personal data relating to prospective, existing and former data subjects and deals with the protection of personal data throughout its lifecycle.

The group information risk governance standard and cyber resilience standard are aligned with international best practice, including the International Organization for Standardization (ISO) 27000 series; ISO 27018 and 29100; National Institute of Standards and Technology (NIST) Privacy Framework; King IV Report on Corporate Governance; Information Security Forum (ISF) Standard of Good Practice (SoGP) for Information Security; Payment Card Industry Data Security Standard; Data Administration Management Association Data Management Body Of Knowledge; The Bank for International Settlements' Committee on Payments and Market Infrastructures and the International Organization of Securities Commissions (CPMI-IOSCO) Guidelines for Cyber Resilience, the regulator Joint Standard on Cybersecurity and Cyber Resilience.

We recognise our responsibility to uphold the highest standards of data privacy to respect the privacy rights of all Standard Bank Group employees. Our **employee privacy statement** applies to all employees and is available to all employees through the group's intranet.

It describes:

- Categories of personally identifiable information, and why and how we collect it
- Where we keep this information, how we keep it secure and how long we keep it
- Whether and under what circumstances we disclose it to any third parties
- Employee rights in respect of their personal data.

Roles and responsibilities

All employees are required to:

- Protect information and comply with relevant policies, including the information risk policy, acceptable use of information assets policy and cyber resilience standard
- Lawfully process personal information as documented in country-specific privacy statements
- Complete mandatory compliance training, including mandatory information security and mandatory biennial cybersecurity awareness training
- Use group information assets, including mobile devices, appropriately and responsibly
- Ensure data privacy is incorporated into how we design and run our core business processes
- Attest to having read and understood the group acceptable use of information assets policy and other applicable policies every time they log in to their Standard Bank computer. Attestation includes confirmation that non compliance with group policies may result in disciplinary action, including termination of employment
- Report security violations and non-compliance with group policies
- Report any information risk or cybersecurity concerns.

The SBG intranet and our risk management chatbot provide direct links to relevant policies. Employees can also access support via the risk chatbot, which is able to answer various questions related to information risk and data privacy. All employees have access to a ‘report phishing’ function in Microsoft Outlook, which they are regularly reminded to use if they receive a suspicious email.

Disciplinary or legal action may be taken against any employee who does not comply with group information risk policies and cyber resilience standards. Where such non-compliance constitutes gross misconduct, it may result in dismissal.

Standard Bank employs approximately **4 600** people in group technology. **328** employees are in dedicated cybersecurity roles. Security skills are continuously developed to keep up with the latest technology trends, tools and techniques used by attackers. We contribute to the larger security community by participating in industry cyber risk forums, extending our cyber risk management experience to our partners, service providers and third parties, and supporting internal and industry-led security skills development initiatives to improve the shortfall of cybersecurity skills across the continent.

Key roles and responsibilities

Group information security: Uphold a culture of security across the group, fulfil regulatory requirements, provide a robust control environment centred on maintaining our clients’ trust in our digital platforms.

Group information risk: Determine, enable and improve the governance of information risk, provide subject matter guidance, oversight, assurance and reporting to enable the protection of SBG information assets by empowering conscious risk taking. Enable data privacy risk management in line with applicable regulatory requirements. Ensure availability of information risk related training and awareness.

Group technology: Ensure policy principles are embedded in technology and technical solutions and infrastructure for internal and external systems and associated security controls enable and gives effect to these principles.

Information security officers: Ensure consistent implementation of cyber resilience and data protection capabilities across the technology landscape.

Group data privacy officer: Sets group’s approach to data privacy; monitors implementation of group privacy operating standard in line with regulatory frameworks; provides a consistent standard for management of lawful grounds to process personally identifiable information and data subject rights management; enables training on group-wide data privacy matters.

Data privacy officers in jurisdictions and legal entities: Ensure alignment to group approach to data privacy; support and maintain the data regulatory universe; identify compliance obligations and integrate into existing frameworks, policies and procedures; report data privacy breaches in line with regulatory requirements; engage with data privacy relevant regulators and industry bodies and ensure implementation of group consent management and data subject rights management requirements.

Group chief information security officer (CISO): Creates, measures and monitor the cybersecurity strategy and programme, and reports regularly to board through relevant committees.

Each of the **four business units has a dedicated CISO** who take direction from the group CISO.

Business units, legal entities and group functions: Ensure compliance with the relevant frameworks and policies, ensure execution of documented training and awareness plans, ensure employees and third parties acknowledge and comply with the relevant requirements, ensure data privacy-by-design and data privacy-by-default are incorporated into the group’s initiatives, products, services and technology, ensure protection of information throughout its lifecycle, by following a risk-based approach, ensure information is processed and stored in accordance with regulatory and policy requirements, ensure information retention periods are developed and maintained, manage and report on significant information risk and control weaknesses, including information incidents.

Training

We conduct regular awareness raising and training. Communication channels include email, video clips, and masterclasses and workshops in which we address specific business needs. Courses on topics such as information risk management, data privacy and card payment data protection are available to all employees on our employee training platform and are required training for specific roles. Information and cyber-related learning paths are also available to employees.

All employees must complete annual mandatory compliance training on information security and biannual cybersecurity awareness training.

INFORMATION, PRIVACY AND CYBERSECURITY TRAINING COMPLETED DURING 2024

	% of group employees
Mock phishing simulations	100
Data privacy 101	95
Data privacy awareness	100
Cyber risk training	86
Keep it secret keep it safe	99
Protection personal information	98

Continuous monitoring and improvement

We continue to invest in improved capabilities to predict, prevent, detect and respond to cyber incidents. We gather cyber threat intelligence, which is shared across the group to enable risk mitigation and inform improvements to the cyber resilience programme.

The cyber resilience programme employs a **continuous testing and monitoring** strategy to stress test security capabilities.

TESTING INCLUDES:

People testing

Monthly awareness campaigns for employees on the latest threats and risks. As part of the continuous testing approach, employees receive mock phishing emails at least once a year. All employees are required to complete mandatory cybersecurity awareness training every two years.

Technology testing

External vulnerability assessments of our digital footprint, red team assessments of the network and penetration testing of our systems.

Response testing

Cyber-incident response simulations, table top exercises and disaster recovery testing.

Monitoring includes using machine learning and data analytics to continuously measure the effectiveness of controls across the group. These measures provide a near real-time view of the cyber risk profile and have been incorporated into the group value metrics.

Internal audit conducts information and cyber risk reviews annually to test security and vulnerability of systems and processes affecting user data. Compliance monitoring conducts reviews on data privacy. External auditors assess our IT infrastructure and information security management systems annually as part of the combined assurance audit of the group's financial results.

The group has pursued certification of specific technology infrastructure where it is regulated. These are re-audited periodically to maintain the certification.

These include:

- ISO27001 certification for the Shared Africa Regions Core Banking Platform
- ISO27001 certifications for Core Banking for Uganda, Nigeria and Ghana
- PCI-DSS certifications for Ghana, Nigeria, Namibia and South Africa.

Risk management in relation to third parties

We proactively manage third-party risk.

- Third parties are onboarded through a rigorous process designed to assess the third-party across various risk dimensions. Information risk third-party questionnaires (TPQs) are designed to evidence obligations and due care relating to information risk and data privacy regulatory requirements.
- Group procurement ensures that protection of information is included in all aspects of the procurement value chain.
- The third-party risk management team ensures that protection of information is included in all aspects and drives implementation of the third-party risk management framework.
- Data protection, data privacy and cybersecurity clauses are included in contract agreements with third parties. Contracts also include a right to audit clause, allowing for periodic assessments of the third parties.
- Where third parties provide digital solutions, the third party must ensure security requirements are met, in line with the cyber resilience standard.
- Legal action may be taken against any third-party that does not comply with group information risk and cyber risk policies.

Reporting and escalation of incidents and breaches

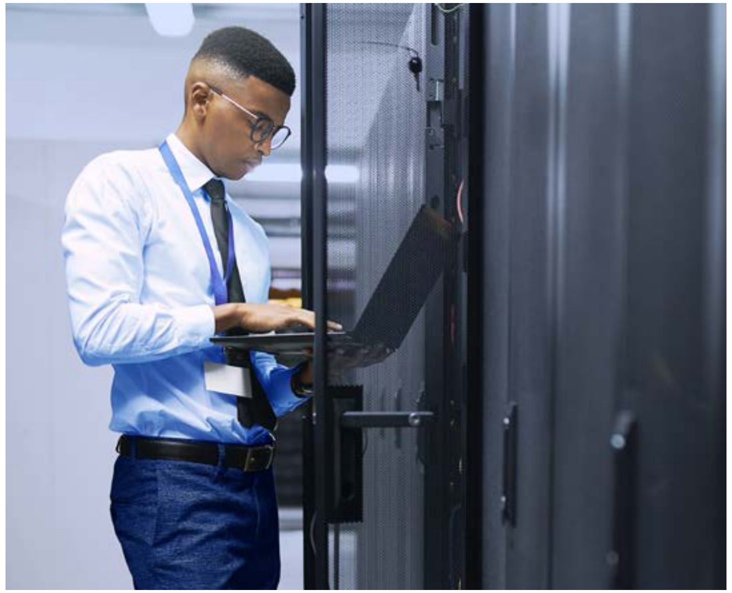
All information risk incidents must be reported, escalated and handled in accordance with relevant group policies.

The group non-financial risk management policy requires that all operational risk incidents must be identified and reported within stipulated time frames and recorded in the risk marketplace (RMP). All employees are responsible for reporting level 1 and 2 operational risk incidents as soon as possible and at least within 48 hours after the incident has been identified. Other incidents must be reported within 30 days of discovery. Incidents are centrally recorded in the RMP system to enable root cause analysis, reporting and appropriate closure.

Data privacy officers are responsible for ensuring that data privacy breaches are reported to regulators in a timely manner and in accordance with regulatory requirements (in South Africa breaches are reported in line with POPIA).

The Information Regulator (or similar regulating body) and data subjects are notified in instances where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by an unauthorised person.

Cyber incidents are coordinated by a **central cybersecurity team**. A cybersecurity incident response team (CSIRT) is convened, which includes representatives from business, risk and technology. We have business continuity processes in place for all business areas, including their IT systems. These are tested at least annually. Cyber incident response playbooks are in place for all common cyber incidents. The group maintains dedicated cyber insurance cover for additional protection against common cyber threats.



2024 metrics

Client impacting cyber incidents

0

2023: 0 | 2022: 0

Material Level 1 information incidents or data privacy breaches

1

2023: 0 | 2022: 1

Privacy complaints (SBSA)

200

2023: 245 | 2022: 155

Four complaints were reported to the regulator. No regulatory fines or penalties were issued due to information incidents.

In November, a Standard Bank employee, who had authorised access to specific client data, copied some of this data to an unprotected personal device. The data copied included limited personal and/or financial information of a limited number of clients in South Africa. It did not include client passwords and PINs. In line with the Protection of Personal Information (POPI) Act, we communicated with the impacted clients and notified the appropriate regulatory authorities. No systems were compromised. An investigation was conducted and disciplinary steps were undertaken.

In Eswatini an enforcement notice was issued for breach of personal identifiable information.

Investigations

The group differentiates between information incidents and data privacy breaches in support of our external regulatory reporting obligations. The impact of incidents and breaches are assessed against a materiality matrix as part of our broader non-financial risk management framework. We investigate all reported incidents of privacy infringements and loss of client data. Client complaints are addressed swiftly, with a focus on giving the best possible service to our clients. If an information incident or data privacy breach occurs at a third-party supplier or service provider, Standard Bank will act to ensure that the impact on our clients is mitigated.

Reliability of digital channels

We are dedicated to delivering exceptional value to our clients and stakeholders by enhancing efficiency, productivity, automation and standardisation across our operations. The stability, security and speed of our IT systems is fundamental to our ability fulfil our purpose, execute our strategy and foster trust with our clients.

Our modernisation initiatives, such as service and application decoupling, have reduced system downtime and the extent and impact of system outages. Our investment in cloud infrastructure has enhanced business agility and our ability to release products and features faster, while bolstering system resilience and reducing our technology carbon emissions footprint.

We continue to:

- Improve the reliability of the group's critical processes and services
- Maintain our strong security posture by driving key initiatives focused on access management, cyber hygiene, third party devices, network and endpoint security
- Implement advanced level observability (the ability to measure a system's current state based on the data it generates)
- Streamline processes for real-time decision-making and production oversight
- Use a risk sensitive approach to change management, baseline service availability and performance levels
- Interrogate the root causes of incidents, implementing effective mitigation and ensuring no repeat causes
- Work with our strategic third-party partners on system health reviews
- Use our strategic partnership with ICBC to identify and implement opportunities to improve system reliability
- Sustain a culture of basic brilliance, especially on execution in technology.

We experienced no significant outages in 2024, with 29 successive months of month-end technology stability. Positive trends on the industry stability tracker (Downdetector) indicated improved stability performance relative to our industry peers in South Africa. This good progress is further highlighted by a marked improvement in cumulative downtime for critical incidents.

When outages are experienced, we ensure communication is effectively directed to impacted customers. This includes two-way communication on SBG mobile, in-platform communications via internet banking and the mobile app, clear communication of alternative channels should one or more channels experience difficulties and information about available helplines.

Our response and recovery times have significantly improved since early 2022. Our average mean time to repair following an outage is 3.45 hours.

Core elements of our approach to strengthening system stability and security include recognition that we are one united team, bringing together a wealth of diverse experience and skills; a focus on transparency and open communication; a commitment to escalate any issues rapidly to ensure fast recovery; and a strong sense of accountability and pride in our work.

Complementing these efforts is our investment in talent development, including specialised training programs in platform technology and generative AI. Initiatives such as the annual UniHack and Technology Hackathon inspire innovation and strengthen our internal capabilities.

5

OUR PEOPLE

DIVERSITY AND INCLUSION | SKILLS DEVELOPMENT AND ADAPTING TO EVOLVING NEEDS
EMPLOYEE ENGAGEMENT | OCCUPATIONAL HEALTH AND SAFETY

Standard Bank employs over 54 000 people across the group. We assess our performance in relation to our employee engagement value driver using four sets of metrics.

Workforce diversity

African representation at senior management level in South Africa

30%✓

Target: 32% by 2024

Women in leadership: Executive and senior management

42%✓

Target: 42.5% by 2024

Employment engagement

Employee net promoter score

+48

Target: +48

Employment retention

Employee voluntary turnover

4.5%✓

Acceptable range: <8%

Employees by type of employment contract

	2023		2024	
Total	54 176		**54 115**	
Permanent	50 451	(93%)	**50 316**	**(93%)**
Non-permanent	3 725	(7%)	**3 799**	**(7%)**

Diversity and inclusion

Our diversity is an inherent strength. We celebrate that our employees represent 73 nationalities. We actively leverage our people's different perspectives and experiences to provide better solutions for our clients and to serve our local communities with purpose and relevance.

We strive to provide a work environment in which all our people feel a strong sense of belonging, are enabled to realise their full potential and can bring their whole selves to work. Our people policies and practices reflect our commitment to diversity, equity and inclusion.

Diversity and inclusion strategies in our countries of operation are tailored to balance group and local priorities.

- All countries focus on promoting gender equality.
- In South Africa and Namibia, our strategies and goals align with local employment equity requirements.
- Inclusion of people who are living with disabilities has progressed from a societal expectation to a legal mandate in several of our countries of operation with associated representation targets. We continue our efforts to adapt our workplace practices to ensure an inclusive work environment in which people's special needs can be reasonably accommodated.

DIVERSITY OF PERMANENT WORKFORCE

	2020	2021	2022	2023	2024[1]
Total	44 450	43 608	44 002	45 299	**50 316**
Gender					
Male	18 895 42.5%	18 515 42.5%	18 775 43%	19 297 43%	**21 462** **43%**
Female	25 555 57.5%	25 093 57.5%	25 227 57%	26 002 57%	**28 854** **57%**
Region					
South Africa	29 581 66.5%	28 956 66%	28 871 66%	29 712 66%	**33 648** **67%**
Africa Regions	14 247 32%	14 035 32%	14 486 33%	14 879 33%	**15 937** **32%**
International	622 1.4%	617 1.4%	645 1.5%	708 1.6%	**731** **1%**
Age (%)					
20-29	16.5	14	13	13	**11**
30-39	47	47	47.5	45	**44**
40-49	25	27	28	29	**31**
50-59	10	11	11	11.5	**13**
60 and over	1.2	1.3	1.3	1.3	**1**

Distribution of nationalities

64% of SBG employees are South African, 8% are Nigerian, and 4% are Ugandan. The remaining 24% include Namibians, Kenyans, Mozambicans and Ghanaians (3% each), Malawians, Zambians, Zimbabweans and Basotho (1.5% each), Angolans, Batswana and Tanzanians (1% each) and 3% from our other countries of operation in Africa and our international hubs.

NON-PERMANENT WORKFORCE

	2024	
Gender		
Male	**1 672**	**44%**
Female	**2 127**	**56%**
Region		
South Africa	**1 323**	**35%**
Africa Regions	**2 448**	**64%**
International	**28**	**1%**

[1] 2024 data includes Liberty. Data for previous years excludes Liberty. Liberty employees comprise 10% of SBG's workforce. The inclusion of Liberty data in 2024 has not resulted in material changes to percentages per demographic category.

Pay equity

We believe strongly in the principle of equal pay for work of equal value. Our policy framework ensures that employees doing similar jobs at the same level are paid equitably. Our focus on pay equity is an entrenched business practice and is a factor influencing remuneration decisions during the annual remuneration review and when appointments and promotions take place. Since 2019, we have conducted an annual multivariate regression analysis on employee pay, to identify any gaps between the remuneration of female versus male employees on a like-for-like basis. This analysis includes both fixed and variable elements of remuneration. Our gender pay equity analysis in 2024 again affirmed that we pay women and men fairly and that there are no systemic issues of gender pay discrimination at a group or country level.

For South African employees, we also submit an annual analysis of income differentials by race and gender to the Department of Employment and Labour. This analysis further supports that our holistic approach to pay equity produces fair outcomes.

2024 awards

We aim to continually enhance our remuneration disclosures in line with shareholder requirements and evolving local and global reporting standards. The South African Reward Association recently awarded SBG the prestigious **2024 Remuneration Report Award**. This award recognises organisations for the alignment of their remuneration reporting and disclosure with the key principles of the King IV governance guidelines which exemplify fair, responsible and transparent policies and practices.

Gender

We are committed to supporting gender equality and empowerment of all women and girls. We aim to ensure full and effective participation of women across our global workforce and providing equal opportunities for representation all levels of decision-making. We have targets for the representation of women on our boards and in senior leadership and provide regular updates to the board on progress.

Senior leadership

- Women represent **42%✓ of executive and senior management**.
  - Women hold 35% of executive positions and 44% of senior manager positions.
- In South Africa, our largest country of operation, women comprise 43% of executive and senior management. Black women comprise 29.1%✓ of senior management.
- In Africa Regions and Offshore, women account for **5.3%✓** of chief executive positions.
- Women comprise 48% of total management positions (junior, middle, senior and executive management); 49% of revenue-generating functions, and 33% of technology-related functions.
- Measured against the 2023 McKinsey Women in the Workplace study, we continue to compare favourably with global averages for representation of women in executive and senior management positions.

Developing female leaders

We make a significant investment in leadership development for current and future leaders. In 2024, **59%** of participants in our various leadership programmes were women. **56%** of those promoted across the group in 2024 were women, as were **49%** of new hires.

We offer tailored development programmes for women at business unit and country level. These include targeted personal development initiatives, leadership development opportunities and bespoke programmes, designed to support women with high potential to become future SBG leaders. We also provide women with networking, skills development and mentoring opportunities to build their leadership capabilities. Our approach to succession has a deliberate focus on gender. Women comprise **45% of successors** in our talent pool for key leadership roles across the group.

Our board

- In December 2024, women represented 35.7%✓ of SBG board members. Rose Ogega joined the board on 1 January 2025. We have now met our target for 40% female representation on the board. We will continue to support female board representation through our approach to board succession planning.
- Our board is chaired by a woman, as are four of the board sub-committees.

% OF WOMEN AT VARIOUS LEVELS

	SBG Board	Executive and senior management	Middle management	Junior management	General staff
2024	**35.7✓**	**42.0✓**	**46.7**	**52.8**	**63.4**
2023	28.6	41.5	46.6	53.6	63.4
2022	31.3	40.8	46.2	52.5	63.5
2021	33.3	39.6	45.6	52.2	63.9
2020	35.3	38.7	45.3	52.0	63.5

We recognise the importance of supporting and empowering both men and women to contribute to the creation of equitable and inclusive workplaces, homes and communities, creating a network of allies on gender equity. Our allyship programme provides male employees with a platform to contribute to the solution.

During 2024, we facilitated several employee dialogues focusing on empowering men and women to promote equity and inclusion across all areas of our lives and challenging traditional gender norms and stereotypes that limit opportunities for both men and women.

2024 awards

In 2024, Standard Bank PPB CEO, Funeka Montjane, won the Woman of Substance Award. The award celebrates female leaders who have made significant contributions to the chartered accounting profession and uplifted others as they rise in the business, social, and economic landscapes of South Africa.

"By empowering excellence and inspiring change in her own career and the banking industry at large, Funeka embodies the AWCA's mission to identify, nurture, and lead. Her achievements reflect the broader impact of the AWCA in driving excellence and change within the profession and society at large."

Buhle Hanise
AWCA President

Disability

We are committed to increasing the representation of people living with disabilities in our workforce and providing reasonable accommodation for them to thrive in the workplace. We continue to raise awareness of our disability declaration process to ensure that we are providing the appropriate tools and reasonable accommodation to enable our people to be fully productive and included. Where applicable, we cater for individual needs such as assistive equipment, specialised software and improved accessibility of our learning platforms for those with visual impairments. We actively work to remove attitudinal barriers that may prevent the full inclusion of people with disabilities through awareness and learning initiatives for our people and leaders.

In South Africa, we include targets for the representation of persons with disabilities in our employment equity plans across all business areas, and continuously engage persons with disabilities through the SBSA Disability Network. We aim to continually increase inclusion through recruitment as well as encouraging employees living with disabilities to declare these. Our efforts to encourage employee declarations has seen a 22% increase in the number of our SBSA employees registered as people living with disabilities.

In Africa Regions we have achieved a year-on-year increase in the recruitment of persons with disabilities, although the numbers remain small. Emphasis will be placed on understanding the barriers to ensuring improved representation by persons with disabilities as part of our refreshed Group Diversity and Inclusion strategy.

Under-represented population groups

All our countries of operation endeavour to ensure that our employee base is representative of the local population. Country-specific policy and regulatory requirements, context and local nuances inform our country level diversity and inclusion plans and areas of focus. This alignment with country-level priorities also strengthens our employer brand.

Our Employment Equity plans in South Africa and Namibia drive our efforts to improve the representation of under-represented population groups.

- In South Africa, we have employment equity targets as required by legislation. We have achieved some targets and continue to make steady progress on others, including increasing the representation of African people at senior management level. We submitted our new five-year Employment Equity Plan to the Department of Employment and Labour, reflecting our targets to increase the representation of underrepresented groups. Our **SBSA annual integrated review** provides detail on performance against targets.
- Namibia has achieved equitable representation against targets for previously disadvantaged senior managers.

Specific ethnic and tribal dynamics are considerations in some of our countries of operation. Some countries prioritise the inclusion of historically marginalised populations, such as the Creole in Mauritius, Basarwa in Botswana, and various minority tribes in Kenya.

Diverse Identities

We value the diversity of identities, including those of the LGBTQI+ community, as a vital part of fostering an inclusive and equitable workplace. We recognise that legal and cultural contexts vary across the countries where we operate, and we approach these differences with sensitivity and respect. Across all our markets, we are committed to creating work environments that are free of discrimination, where every employee feels valued and supported. Certain of our countries of operation have anti-homosexuality legislation in place. We remain committed to protecting the rights of our employees to be free from discrimination at their place of work, while complying with the local regulatory requirements in particular jurisdictions.

2024 awards

- Excellence in Women Empowerment Strategy Award, HR EXPO Africa, Nigeria
- Highly commendable rating for Diversity and Inclusion, International Investment awards, for Standard Bank offshore
- Outstanding commitment to the development and prosperity of Malawi Corporate Award, Men and Women Building Malawi category, from CEO Africa & Wealth Magazine.

Employee responsibilities

We respect the rights of our employees and endeavour to offer a safe and fair work environment for all. We have a zero tolerance approach to harassment and unfair discrimination. Our group policy on harassment including sexual harassment and unfair discrimination provides clear, non-negotiable principles and standards.

All employees are required to complete compulsory annual online training on harassment in the workplace (sexual and other). 99% of employees completed this training during the last cycle. We offer unconscious bias training, including tools and strategies to counter such bias, to managers and employees to encourage self-awareness.

Dealing with breaches

Employees can report any incidences of discrimination, harassment, sexual harassment or bullying to their line manager, people and culture representative, the group head of employee relations, or to the group's **anonymous whistleblowing reporting channel.**✓ All reported cases are taken seriously and dealt with promptly and respectfully. Victims of harassment and discrimination are provided with the necessary support, and we ensure that they are not in any way prejudiced or disadvantaged for laying a bona fide complaint. All employee grievances, regardless of their nature, are viewed in a serious light and are dealt with in a fair and consistent manner.

The group's grievance process allows employees to select whether they would prefer to approach their grievance informally or through a formal process. The formal process comprises multiple stages. The initial stage is addressed by the leader of the employee against whom the grievance has been laid, with the stages thereafter offering points of escalation. Where serious concerns are raised the group will examine whether the matter warrants external intervention. In these instances, we would engage one of a number of trusted and respected independent external investigators to assist with investigating and resolving the concerns in an objective, fair and unbiased manner.

We have robust disciplinary processes in place for employee transgressions with a preference to, where possible, follow corrective discipline. While we view misconduct in the most serious light, we are committed to running our disciplinary processes in a fair and consistent manner which respects the dignity and humanity of all employees involved.

Incidents

During 2024, 25 incidents of alleged discrimination were reported through the group's formal grievance processes. These were addressed in accordance with the group's policies and procedures.

Skills development and adapting to evolving needs

Developing our people is one of SBG's core values. In 2024, we invested more than **R900 million** in employee training, provision of training facilities and dedicated learning resources to create tailored content. On average, each employee spent **60 hours** on learning, which is in line with global benchmarks. Our learning and development strategy includes a multi-faceted approach to address the business demand for specific core banking, highly specialised and future-focused skills while also meeting the learning needs of our people to grow and thrive at work well into the future.

Self-directed learning	Our people spent 56% of their learning time on self-sourced learning. All employees have instant access to abundant learning opportunities through our learning experience platform, MyLearning. We guide our people to engage in relevant and topical learning through priority learning experiences which we socialise annually across the group.
Foundational enterprise-wide skills development	Each year, we undertake research into critical and high-demand skills and use these insights to refresh of our priority future skills curriculum. In 2024, we added ESG and AI/Gen AI learning pathways to our future skills curriculum. Our people completed over 34 000 future skills modules in 2024.
Fit-for-purpose learning to enhance core capabilities	Learning specialists work with each area to develop and implement bespoke learning programmes to build specific and technical skills. Some programmes include formal accredited qualifications.
Building skills for hard-to-fill jobs through academies	In 2024, we initiated the design of two new academies: A Relationship Management Academy and an ESG Academy, aligned to our SBG strategic objectives. Our existing academies matured against audit standards, and the Universal Banker Academy reached 'best in class' status. Academies include: Non-Financial Risk , Salesforce, Behavioural Economics, Data Science, Insurance BCM Relationship Management, CIB Analyst and Cloud Academies.

Average number of hours spent on learning per employee by

GENDER (GROUP)

Male	Female
58	62

POPULATION GROUP IN SA

Overall	White	African	Indian	Coloured
53	41	57	43	53

WORKFORCE LEVEL (GROUP)

Overall	Executive	Senior Manager	Middle Manager	Junior Manager	General staff
60	39	42	43	56	68

AGE (YEARS)[1]

<20	20–25	25–30	30–35	35–40	40–45	45–50	50–55	55–60	60–65
78	117	73	61	61	60	53	50	44	32

[1] The age-related learning metrics exclude Liberty.

Time spent learning per learning type (%)

Online self-directed	Virtual classroom	In-person classroom	Event-based
57	13	28	2

EXAMPLES OF LEARNING PROGRAMMES

ESG learning programme

Standard Bank commits to fostering sustainable and inclusive growth across Africa. Our ESG and Sustainability Learning Framework, launched in 2022, equips our employees with the knowledge and skills needed to embed sustainability principles and ESG risk management into all facets of our business and ensures that we are well-placed to serve our clients on their sustainability journeys.

Training type and target audience	Objective	Employees who completed training in 2024
Introductory		
▪ Accessible to all employees ▪ Self-paced on-line learning hosted on the Learning Experience Platform	▪ Enhances employees' awareness and understanding of sustainability and ESG risk management ▪ Includes the ESG Fundamentals pathway, as part of the Future Ready Skills Curriculum, with modules on climate risk, nature risk and sustainable finance	**6 000**
Intermediate		
▪ Client-facing roles ▪ Designed and developed in partnership with Euromoney	Develops understanding of sustainable solutions for clients, including: ▪ Certified sustainable finance training ▪ Renewable energy masterclasses for BCB relationship managers, to help them support clients to achieve energy security and to support relevant clients to gain renewable energy accreditation to access export markets ▪ Sustainability masterclasses tailored for teams such as credit risk	**100**
Advanced		
▪ Product, sector and country heads	▪ Includes the ESG Advanced Certificate programme, co-created and delivered in partnership with the University of Pretoria's Gordon Institute of Business Science and Cambridge Institute for Sustainable Leadership ▪ Capacitates employees to develop practical solutions with clients, partners and other stakeholders to drive sustainable growth	**66** (in addition to 20 employees who completed the pilot in 2023)
Specialist		
▪ Individuals in key roles	▪ Formal qualifications including Masters and PhD studies focused on sustainability and climate	**5**
Internal secondment programme		
▪ Applications are open to all employees ▪ Six-month secondments in sustainability teams in BUs and group risk	▪ Opportunity for selected employees to upskill themselves on various aspects of sustainability, sustainable finance, project finance and ESG risk management	**9**

2024 awards

An independent advisory panel of industry experts awarded Standard Bank a GIBS client award, in the category Responsible Organisations: Sustainable Practice, for the ESG and Sustainability Advanced Development Programme. SBG was recognised for our exceptional contribution to learning and development, achieved through our strong partnership with GIBS and our shared focus on improving responsible individual and organisational performance in South Africa and the broader African environment, through high-quality business and management education.

Behavioural Economics Mastery Programme

This training programme was designed to upskill top talent with the skills required to analyse customer behaviour, understand the factors that influence customer decision-making, and solve pain points for customers to generate commercial returns for the business.

- Between 2020 and 2024, 110 employees and graduates from 15 countries participated in the programme.
- Programme participants implemented more than 500 projects applying behavioural economics. These projects generated additional business value of over R1 billion - ten times the return on our investment.
- 57% of programme participants have been promoted to more senior roles since completing the programme.

#FutureShift programme

- An innovative learning programme in our group operations team, designed to foster a forward-thinking approach to operations, emphasising innovation, problem solving and operational excellence and including practical application through workplace exercises
- 119 employees participated in the programme, and 96 employees completed the programme. They collectively generated R34.4 million in annualised benefits through the delivery of 28 action-based projects
- 93% of the impact survey sample group reported that the programme had a positive impact on their work performance. The same percentage reported that the programme influenced them to stay with SBG
- The programme won the Brandon Hall Silver award in the category of Competencies and Skills Development from the Brandon Hall Group.

International mobility

International mobility enables SBG to achieve our strategic goals, meet operational needs and develop talent across borders. This fosters a culture of employee growth, collaboration and innovation. Our international mobility framework supports short and long-term assignment opportunities, intra-group permanent transfers, cross-border remote working and the ICBC-SBG staff exchange programme. In 2024:

- 73 employees participated in international assignments, of which 53 are long-term assignments and 20 were short-term assignments. 64% of participants were male and 36% were female.
- We facilitated 32 intra-group permanent transfers
- We enabled 11 employees to work remotely from locations in the United Kingdom and United States
- Ten employees participated in the ICBC staff exchange programme, bringing to the number of assignees to 66 since the inception of this programme in 2017 (27 from SBG and 39 from ICBC).

Workforce return on investment[1]

2.7

Target: 2.5

1 The financial benefit to the group from investing in our employees, measured as value generated (using indicators such as increased productivity and reduced turnover) compared to the cost of training, development and other workforce initiatives.

Youth development

We have a 27-year track record of providing talented young people with their first opportunity to break into the job market, building a sustainable long-term talent pipeline in the process. We aim to attract and retain young people with scarce skills, who have the potential to become senior leaders.

We provide our young employees with exposure to global, regional and local opportunities to broaden their experience. For example:

- Six employees participated in the **One Young World Summit** in Montréal, Canada. The Summit aims to empower and develop young leaders from almost 200 countries to build a fair, sustainable future for all and to come together to confront the biggest challenges facing humanity. Focus areas in 2024 included indigenous communities, the climate and ecological crisis, AI, health equality and peace. 89 employees participated in a rigorous selection process.
- The **East Africa regional graduate trainee programme,** launched in 2023, sought to attract and develop scarce technology, actuarial and data science skills across East Africa, build a future ready workforce and strengthen our brand as an employer of choice. 73 graduate trainees worked in multi-national collaborative teams to solve real problems in Kenya, Malawi, Uganda and Tanzania. The programme concluded in 2024. 93% of the graduates are continuing their employment within the group.

We also partner with various stakeholders to **develop young talent through partnerships.** For example:

- We launched the Ngodwana Aquaponics Project in partnership with SAPPI in 2022, to promote youth job creation and food security. 28 young people (100% African, 46% female) from Elandshoek and neighbouring communities were hired to transform an open piece of land into an operational and profitable aquaponics farm and received training on how to convert their produce into high-end products in their own kitchen. In 2024, they opened a shop which sells their products.
- We partnered with three of our solar engineering, procurement and construction client companies to place 18 young people (100% African, 72% female) with electrical qualifications in a 12-month paid training and workplace experience programme, which included formal training in solar panel installation. A further 32 young people will join the initiative in 2025.

Skills development programmes for young people	Participants in 2024
Graduate programmes: Attracting graduates to build our scarce skills and leadership pipelines in five countries	**320** graduates, **203** in South Africa and **117** across Africa Regions **47%** female In SA, **65%** African
Internship programmes (South Africa): In specialised fields such as insurance, technology, actuarial science and Salesforce	**132** interns **52%** female In SA, **93%** African **53** interns who completed their programmes in 2024 were offered employment at SBG
Unemployed learnerships (South Africa): Learnerships for unemployed young people to gain work experience on a fixed term contract and the opportunity to complete their NQF 5 and 6 qualifications in banking, insurance, IT systems development and financial instruments	**402** learners **60%** female **93%** African **181** learners who completed their programmes in 2024 were offered employment at SBG
Employed learnerships (South Africa): Learnerships for our employees who want to obtain formal qualifications in banking, insurance, management, engineering, paralegal and wealth management.	**579** learners **68%** female **73%** African

2024 awards

The SA Graduate Employer's Association (SAGEA) named SBG the overall Aspirational Employer of Choice, and Employer of Choice in the Commercial and Retail Banking category. The awards are based on votes from young job hunters with confirmed job offers from 82 graduate employers in South Africa.

2024 awards

- SBG was again recognised as one of the *World's Best Employers* by Forbes. We ranked 18th out of 850 large multi-national and multi-jurisdictional organisations from over 50 countries. We ranked highest in Africa and second in the global Banking and Financial Services sector. The World's Best Employers are chosen each year by Forbes in partnership with Statista, based on an independent and anonymous survey conducted with over 300 000 employees world-wide.
- SBG was certified as a Global Leading Employer for 2024, an accolade awarded to the World's Top 1% of companies (approximately 850 companies). Leading Employers, based in Germany, is the world's only independent meta-study that considers more than 250 independent data sources to determine the top 1% of employers, across all sectors and regions. It is not a commissioned study, and it is not possible for companies to actively register for certification.
- We were also recognised at country level, receiving the Employer of Choice 2024 Award from the Employer Consultative Association of Malawi (ECAM), the Elite Employer award from Tempus Global Group in Mozambique, and Outstanding Employer Branding Award from HR People Magazine in Nigeria.

Leadership development and succession planning

Our leadership and management programmes support business performance and employee engagement. We have a robust talent management and succession planning approach that enables leaders to better understand the depth and diversity of their succession pools. We hold People Days at different levels, enabling cross-functional conversations and successor recommendations for key roles. Our chairman also hosts an annual Board People Day to give board members the opportunity to assess the adequacy of our successor pools for key roles.

We recognise the versatility in skills and experience of our talent pools and balance this with our successors' aspirations and preferences. Development plans for successors are tailored to prepare them for future roles. The maturity of our succession pipelines is evident in the career growth and internal movements in our key roles, and the increase in our coverage ratio and diversity representation from an Africa Regions and SA employment equity perspective.

In 2024, **16 909** employees took part in leadership and management development initiatives, of which **59%** were women. **62%** of our vacancies were filled by current employees, which is testament to our internal talent pipeline and the opportunity for our people to grow their careers with us.

Examples of our group and bespoke leadership development programmes

Group leadership development programmes	Participants in 2024
Senior manager programme: Enabling leaders to embrace change, build confidence and lead their teams by creating a shared purpose and enable innovation for the future	**192 participants** **50% female**
Middle manager programme: Building the necessary skills to lead and practice leadership behaviours that will enable enhanced performance	**284 participants** **53% female**
Junior manager programme: Building foundational management skills and capabilities	**294 participants** **54% female**
Team leader programme: Building participants' confidence in their leadership abilities	**207 participants** **55% female**
Management essentials programme: Developing people management skills	**111 participants** **51% female**
Bespoke leadership development programmes	
Blue Malkia Women in Leadership programme: ▪ Brings together women from across the business at various levels and provides them with the opportunity to connect and network with one another and with senior leaders ▪ Provides participants with insights on how to manage their personal networks and brand, how to show up professionally, benefit from leadership lessons from group leaders, and personal financial management tips	**169 participants** **100% female**
Chief executive Leadership conversation series (Africa Regions) ▪ Focuses on critical topics to drive strategy execution and growth	**22 country chief executives**
Future-Gen CFVO ▪ Equips our next generation of CFVOs with the skills, tools, and networks necessary to thrive in their future roles ▪ Includes theory, practical application and experiential learning	**17 participants** **41% female**
Ubora heads of internal audit programme ▪ Equips the next generation of executives with the skills and competencies to build deep technical expertise and be future ready	**50 heads of audit** **44% female**
Africa Ignite programme ▪ Includes focus on alignment with organisational purpose, emotional agility and resilience, trust and collaboration, and leading sustainably.	**54 participants** **100% female**

Group leadership development programmes	Participants in 2024
Additional programmes	
Coaching for Impact	**172 participants** **68% female**
Performance to Potential	**466 participants** **58% female**
Leading Performance	**99 participants** **37% female**

2024 awards

- CIB received the Gold Award of Excellence in the Best Leadership Development Programme category for the Standard Bank Servant Leadership programme, developed and implemented
in CIB Operations, from the Brandon Hall Group.
- Stanbic Bank Zimbabwe won the Excellence in Leadership and Management prize, awarded by the Zimbabwe Institute of Management in recognition of their contribution and dedication to developing and promoting best practices in leadership and management. This was in recognition of the Blue Excellence programme developed as a mini-MBA for informal leaders including union leaders.

2024 awards

- SBG was recognised as one of Time Magazine's *World's Best Companies.* The study uses three primary dimensions: employee satisfaction, revenue growth and sustainability/ESG. Employee satisfaction is assessed using survey data from 150 000 employees across 58 countries, looking at factors such as company image, atmosphere, working conditions, salary, and equality.
- SBG was among Newsweek's *World's Most Trustworthy Companies.* The assessment covers businesses in 23 different industries across 20 countries and is based on a survey of over 70 000 participants. Participants rated companies on employee, investor and customer trust. 230 000 evaluations of companies were submitted. This was supplemented with a social listening analysis.

Employee attraction and retention

Our talent acquisition strategies focus on ensuring we have the right people in the right roles to achieve our strategic objectives and remain competitive. We connect our employees to meaningful career and development opportunities while engaging and attracting external talent with complementary skills and capabilities.

Our digital platforms, including LinkedIn and our careers website, help position our employer brand effectively. An ecosystem of recruitment channels ensures a quality supply of candidates to meet business demands. We also welcome referrals from current employees.

We enhanced our employer brand positioning on external digital platforms with the WHY WAIT? campaign. The campaign reflects our purpose and growth aspirations, appealing to talent with a spirit of excellence. It builds on our positioning as an employer of choice in Africa, targeting key capabilities and priority roles. Over 50 000 people engaged with the content, sharing, and echoing positive sentiments about the SBG employer brand. In 2025, we will continue to support customised engagement with targeted audiences to attract the best talent in Africa.

A key component of retaining top talent is enabling personalised growth and development. Our Opportunity Marketplace creates an internal 'LinkedIn-like' experience, where employees across all countries can showcase their skills, experiences, and aspirations. Those with strong profiles benefit from AI-driven matching to vacant positions, mentors, and short-term project opportunities. The platform directly links to their My Learning profile, listing relevant learning content centred around their desired skills with one click. 22 000 employees engaged with the platform in 2024. Over 15 000 employees with strong profiles benefited from AI-driven opportunity matching, unlocking nearly 7 000 hours of capacity through short-term projects, without additional costs to the business.

Our average cost to hire was **R76 900** in 2024. South Africa accounted for **54%** of new hires, Africa Regions for **44%** and International for **2%**.

Hiring activity	Year	Number	% Male	% Female
Total number of new employee hires[1]	**2024**	**3 100**	**51**	**49**
	2023	4 741	47	53
	2022	4 134	51	49
	2021	2 328	52	48
Open positions filled by internal candidates (internal hires)	**2024**	**62%**	**43%**	**57%**
	2023	61%	39%	61%
Employees promoted, across all levels	**2024**	**7.5%**	**44%**	**56%**
	2023	**11%**	**42%**	**59%**

[1] 2024 figures include Liberty. Prior years exclude Liberty.

Workforce insights/people analytics

Our group-wide integrated people systems are based fully in the cloud, enabling a single view of the employee from a data and analytics perspective.

Our Meaningful Workforce Insights (MWI) solution provides an integrated view of advanced people analytics. All leaders have access to the full spectrum of people data in real-time, to help them make informed people management decisions. We provide training for leaders to ensure effective use of the platform for their needs.

Examples of how we use the solution across our people management practices and processes:

- Set and monitor employment equity and gender targets
- Track employee turnover trends and associated drivers of attrition
- Track learning activity and analyse trends to determine the impact of learning
- Analyse data on talent trends and succession bench-strength
- Obtain advanced insights about the key impact drivers of employee engagement levels
- Undertake strategic workforce planning to model future scenarios from a workforce perspective.

Over **6 800** leaders across the group used the MWI solution in 2024. More than **5 000** new analyses were generated, enabling forward-looking people management decision making.

Turnover

We have seen a decrease in our overall and voluntary turnover. Both remained well below the local financial services industry benchmarks of 15.6% and 9.9% respectively (REMChannel, June 2024) and the global banking sector benchmark for voluntary turnover of 11.2% (Visier, 2024).

GROUP TURNOVER (%)

	2020	2021	2022	2023	2024
Overall turnover	6.0	7.3	9.0	7.8	**7.2**
Voluntary turnover	3.0	4.2	6.0	5.0	**4.5**✓

TOTAL TURNOVER BY GENDER

	2020	2021	2022	2023	2024
Female	5.10	6.37	7.98	6.87	**6.64**
Male	7.11	8.62	10.4	9.12	**7.87**

VOLUNTARY TURNOVER BY GENDER

	2020	2021	2022	2023	2024
Female	2.45	3.54	4.95	4.23	**4.08**
Male	3.69	5.05	7.47	6.01	**5.10**

TOTAL TURNOVER BY REGION

	2020	2021	2022	2023	2024
South Africa	6.54	7.29	8.57	6.84	**6.93**
Africa regions	5.04	7.39	9.77	9.76	**7.55**
International	9.87	11.0	13.7	9.70	**9.81**

VOLUNTARY TURNOVER BY REGION

	2020	2021	2022	2023	2024
South Africa	2.84	3.87	5.22	3.97	**3.98**
Africa regions	3.14	4.66	7.42	6.92	**5.63**
International	5.83	7.92	11.5	7.16	**5.94**

TOTAL TURNOVER BY WORKFORCE LEVEL

	2020	2021	2022	2023	2024
Executive	5.98	8.05	7.76	8.36	**6.64**
Senior manager	6.23	7.78	9.04	6.96	**7.29**
Middle manager	7.58	9.81	10.4	8.84	**7.26**
Junior manager	5.98	8.51	9.97	8.39	**8.09**
General staff	5.62	6.49	8.55	7.54	**6.80**

VOLUNTARY TURNOVER BY WORKFORCE LEVEL

	2020	2021	2022	2023	2024
Executive	3.31	5.42	3.92	3.19	**2.78**
Senior manager	4.39	5.23	7.01	4.81	**4.61**
Middle manager	4.67	5.81	8.44	6.67	**5.14**
Junior manager	4.05	5.69	7.68	6.08	**6.27**
General staff	2.29	3.35	5.10	4.44	**3.89**

TOTAL TURNOVER BY AGE GROUP

	2020	2021	2022	2023	2024
Age: 20 – 29 years	6.25	7.54	10.7	9.01	**7.51**
Age: 30 – 39 years	5.68	6.70	9.00	7.90	**7.28**
Age: 40 – 49 years	5.0	6.52	7.25	6.00	**5.97**
Age: 50 – 59 years	6.07	8.46	7.86	7.25	**4.80**
Age: 60+	38.4	40.5	41.20	40.0	**43.60**

VOLUNTARY TURNOVER BY AGE GROUP

	2020	2021	2022	2023	2024
Age: 20 – 29 years	3.32	5.29	8.45	6.69	**5.71**
Age: 30 – 39 years	3.34	4.59	6.69	5.9	**5.13**
Age: 40 – 49 years	2.70	3.70	5.39	3.95	**4.26**
Age: 50 – 59 years	1.52	2.14	2.41	2.31	**1.95**
Age: 60+	1.02	2.06	1.40	2.23	**0.58**

Employee engagement

Employee engagement is one of the group's six value drivers. We aim to ensure that our people are deeply committed to our purpose, empowered to perform at their best, feel a strong sense of pride, are engaged in meaningful work and passionate about contributing to the group's success.

We deploy a range of group and area-specific employee listening initiatives on an ongoing basis, enabling our people to share their views about their work environment and top-of-mind matters, to ensure that we remain responsive to their evolving needs.

Our annual **'Are You a Fan'** group-wide survey measures the key drivers of employee engagement across the group. We use the eNPS as our headline engagement measure. The score ranges from -100 to +100 and is calculated by subtracting the percentage of detractors (scoring 0 to 6) from the percentage of promoters (scoring 9 to 10).

Employee participation rate: 93%

eNPS score
+48
2023: +48 | 2022: +42

- Remains the highest recorded result since the inception of the survey in 2018
- Includes whether employees would recommend SBG as a good place to work, and how they feel about working at SBG
- Well above the +11 eNPS benchmark for financial service providers in Africa.[1]

Organisational alignment score
91%
2023: 95 | 2022: 92

- This reflects our employees' deep pride in working for SBG and understanding their contribution to the broader SBG purpose.

Employee engagement score
77%
2023: 85 | 2022: 82

- The decline is largely due to the recalibration of our rating scale which now better enables us to identify the outliers that need most attention
- We measure several employee engagement sub-categories, including factors such as employee commitment, career growth and development, psychological safety, empowerment and effectiveness, wellbeing, teamwork and leadership effectiveness.

[1] Africa Advisory Group.

In 2024, the top scoring questions reflected:

- Employee pride in the organisation and a deep connection to our purpose
- Our ability to work in teams to achieve common goals
- Valuing and inviting different perspectives in teams
- Working effectively with other teams across business units and geographies
- Leader integrity.

Responses to open-ended questions reflected their experience of a supportive work environment.

Looking forward to 2025, we will focus attention on improvement in areas with scores below 70%.

These include ensuring that:

- Our people feel they have opportunities for growth and career advancement
- We are more mindful in showing appreciation for the contribution that people make
- We create an environment in which everyone feels heard when they voice their views.

Team insights

While individual responses are anonymised, we share the full survey results with employees, executives and the board. Leaders are responsible for analysing their team's results to assess what is working well and where there is room for improvement. This information is used to help shape their people strategies for the year ahead.

Employee segment insights

Results are analysed by various dimensions to identify trends and insights for specific employee segments. Comprehensive analyses are done from a geography, gender, age group and workforce level. In South Africa, we also assess results from a population group perspective.

Performance management

Our performance management framework ensures that our people have clarity about how they can perform at their best and be recognised for their contribution. Our performance philosophy, 'Perform to Grow', is underpinned by a growth mindset where our people can be challenged to continuously learn and grow in their careers.

Our approach is based on six key principles, one of which is that performance includes not just what we do, but how we do it. Our values-based behaviours form part of our performance rating descriptors. Performance reviews, continuous discussions and feedback formally include an evaluation of these behaviours and how they were demonstrated. Regular and constructive performance coaching conversations help drive personal improvement, growth and business contribution. Our performance approach runs annually.

Beginning of the year

- Agree on clearly defined and measurable individual and team goals based on the group's business strategy and priorities.

During the year

- Employees request feedback from their peers, managers and direct reports to obtain a multi-dimensional view of their performance
- Regular informal performance conversations between employees and line managers to review progress against goals
- An informal or formal mid-year performance conversation, including any necessary recalibration.

End of the year

- Year-end review includes a self-review and a formal performance conversation with the line manager
- Leadership teams in each business area hold People Days, to review and discuss overall performance and ratings, and strengths and development opportunities for team members in their peer groups. While no formal ranking takes place, these sessions reflect on relative performance for people in similar roles to ensure fairness and parity across the team and prevent any individual bias in performance ratings
- Line managers have final performance conversations with team members and confirm final performance rating for the year.

If an employee does not agree with their rating, they can follow a formal process for the rating to be reviewed to ensure a fair outcome.

The final outcomes of performance reviews help to inform decisions with respect to remuneration.

Our performance management approach is enabled by an advanced technology platform to support our people through their performance journey in an intuitive and agile way, including functionalities such as capturing goals, tracking conversations and outcomes, and enabling real-time feedback. Our reward and remuneration decisions and processes consider and promote desired behaviours and conduct as key part of the performance review process. Multi-faceted risk adjustment mechanisms are also embedded in all our incentive structures and decision-making. This includes forfeiture (malus) and clawback provisions.

Working conditions

Fair labour practices are at the core of our value proposition. Our employees have the right to equitable and just working conditions. The group employee relations governance framework provides for constructive employer-employee relationship practices.

Our framework is aligned to international and national regulations and obligations, our code of ethics and conduct and our commitment to ensuring fair employment practices in all our countries of operation. The framework provides a general set of employee relations operating principles, which are incorporated into the policies and procedures of group entities as applicable in their country of operation. We abide by the standards set out by the International Labour Organisation and specifically prohibit the use of child and forced labour within our policies.

The employee relations framework includes our commitment to ensuring:

- Protection of human rights, fair employment practices and the principles of non-discrimination
- The right to fair labour practices in the employment of people and throughout the duration of their employment with the group
- Freedom to express concerns arising in the workplace through established whistleblowing procedures without fear of retaliation or victimisation
- The right to a safe and healthy working environment and the expectation of decent work that is productive and delivers a fair income
- Protection against discrimination in employment and occupation, including recognition of the principle of equal remuneration for work of equal value
- Freedom of association and the freedom not to associate, including the right to collective organisation and representation. The observance of freedom of association provides for, among others:
  - Recognition of collective organisation for employees to form and join unions of their choice (or the right not to) and to exercise organisational rights (or the right not to) as provided for in terms of the relevant laws
  - Collective bargaining through representatives of choice for the purposes of reaching agreement on terms and conditions of employment in terms of the relevant laws and country level agreements. The structure and form of collective bargaining are determined by labour market factors within the country and captured in agreements between SBG and recognised unions.
- Freedom of association and/or collective bargaining is recognised in all countries of operation. We have recognised relationships with unions in 11 countries. There is no risk to worker's rights to exercise freedom of association or collective bargaining in any of our countries of operation in Africa.

In South Africa,
43% of our people belong to a trade union. **10 273 (62%)** of our general staff complement are recognised by the bank for the purposes of collective bargaining.

In Africa Regions,
38% of our employees belong to recognised trade unions for the purposes of collective bargaining.

(Note that these numbers exclude Liberty employees, who are not unionised).

Employee benefits

We recognise that workplace benefits need to be personalised and relevant to our different workforce segments to be able to attract, motivate and retain talented employees.

Our benefits portfolio needs to be adaptive to the evolving SBG context, where the shape and skills of the workforce are shifting in a differentiated manner across the multiple jurisdictions. Group benefits governance guidelines set out baseline minimum standards for benefit offerings to enable group standardisation. This ensures that we position SBG as a fair, equitable and competitive employer while allowing flexibility to ensure relevance, meaning and value at country level. Our approach includes:

- Optimising the use of benefits to encourage and support employees to perform to their full potential and thus provide sustainable and commercial value to the business
- Using data analytics, trends, benchmarks and scenarios to better to understand and meet the needs of the different workforce segments and enhance our employer value proposition
- Providing integrated people solutioning across markets to support the attraction, retention and wellbeing of employees.

In addition to core benefits applicable to all employees, individuals have options to take up voluntary benefits based on their particular needs and circumstances.

Core benefits

- Retirement benefits
- Medical cover/medical aid scheme
- Risk and income protection benefits
- Range of leave benefits including vacation leave, sick leave, parental leave and family responsibility/compassionate leave
- Learning benefits
- Wellness benefits

Non-core benefits

(optional non-compulsory or applicable to specific employee populations)

- Additional incapacity leave due to severe illness
- Life cover for spouses/partners, dread disease cover
- Sabbatical leave, study leave, additional vacation leave, leave accumulation and recognition leave
- Long-service awards
- Special discounted rates on banking and insurance products

Employees qualifying for share/option-linked awards

Employees at any level who receive an annual short-term incentive above R1.5 million (or local currency equivalent) are subject to mandatory deferral in share-linked awards. Key roles at managerial level and above qualify for discretionary deferred incentive awards. Both these awards are in the form of restricted share units.

Flexible working work arrangements

We aim to ensure a balance between flexibility for employees, internal operational requirements, effective ways of working and serving our clients with excellence. Our group flexible hybrid and remote working framework provides high-level minimum requirements for flexible working arrangements, while promoting the principle that the office is the primary place of work.

- Employees who can work flexibly due to the nature of their work, are required to be in the office for a minimum of three days per week.
- Business areas are enabled to implement the minimum standards in a way that works best for them in delivering client and commercial outcomes.
- Exceptions are made when a strong case is tabled.
- In rare cases, fully remote working is enabled.
- Where role requirements allow, employees may opt for flexible working hours, subject to manager discretion.
- In South Africa, where feasible, employees are able to switch from permanent full-time to part-time employment, with the relevant adjustments to their value proposition.

Parental leave

We ensure that our people can take leave to be there in the moments that matter, be it during the birth or adoption of a child or when something unforeseen happens. We aim to support all employees to balance the often-conflicting demands of work and home life as best we can. All full-time employees are entitled to parental leave. Arrangements for part-time employees differ according to country legislation.

- In South Africa, China, Isle of Man, Jersey, Malawi, Tanzania, UAE, USA and the UK we provide primary caregiver parental leave of **16+ weeks** on full pay for the primary caregiver, and two weeks for the secondary caregiver, for births and adoptions. South Africa and the UK provide the same benefit for surrogacy (commissioning parent) and legal guardianship. The Isle of Man and Jersey provide the same benefit for surrogacy (commissioning parent). This covers **68%** of our employee base.
- Arrangements in other countries differ according to local regulations. For example, up to **16 weeks** of paid maternity leave is offered in Angola, DRC, Eswatini, Ethiopia, Ivory Coast, Kenya, Lesotho, Mauritius, Namibia, Zambia and Zimbabwe, representing **13%** of our employee base.
- **Up to 12 weeks** of paid primary caregiver leave is offered in Botswana, Ghana, Mozambique, Nigeria, South Sudan and Uganda, covering **19%** of our employee base.
- Arrangements for paid parental leave for the secondary caregiver differ per country regulations, offering **2+ weeks** in nine countries and up to two weeks in 17 countries.

On their return to work, employees may require time to balance the demands of a new baby/child and the demands in their work environment. Where possible, flexible work arrangements are provided to ensure that employees are supported to adjust to their new responsibilities. When an employee returns to work after being on parental leave, they return on the same terms and conditions of employment as those they had enjoyed prior to parental leave.

We provide breastfeeding/lactation facilities in our wellbeing centres and some of our office spaces. Through our wellbeing providers, employees have telephonic access to nurses who are able to provide guidance, education, and support to lactating mothers. We offer medical cover/medical aid through a number of service providers in our various countries of operation to ensure fit-for-purpose benefits in line with country legislation. Additional support is provided by our independent counselling and advisory services, contracted in specific countries, including advice to ensure wellbeing during pregnancy, psycho-social support and postnatal medical advice (breastfeeding, neonatal care, etc.).

In 2024, **3 674** employees (**6.8%** of total employees) took parental leave, of whom **2 385** were women and **1 289** were men. Our retention rate for employees after returning from parental leave was **94%** for women and **93%** for men.

Employee wellbeing

We take a preventative and curative approach to holistic wellbeing. We offer a wide range of wellbeing benefits and treatment pathways to support and empower our employees.

Physical wellbeing

We recognise the risk posed by non-communicable diseases such as cardiovascular disease, cancer and chronic respiratory conditions, and prioritise preventative healthcare and proactive wellbeing. In collaboration with our local health insurers, onsite wellbeing centres and pharmacy networks, we provide access to and actively encourage preventative healthcare and health screening. This includes personal health assessments, HIV counselling and testing and vaccinations. Our female employees have access to pap smears and mammograms where applicable and male employees have access to prostrate screening for the early identification of cancer-related conditions. We drive awareness campaigns for specific health risks at a country level, such as cancer, malaria and cholera. We empower our people to manage identified health risks in a preventative manner, and to enrol in appropriate chronic disease management programmes where applicable.

A sedentary lifestyle creates potential risk for cardiovascular disease. We encourage our employees to incorporate movement into their normal daily activities and offer a range of options to our people including participation in SBG sport clubs and on-site gyms. Our partnerships with certain health insurers give employees access to discounted gym membership fees and digital health platforms.

In South Africa, we offer onsite health screening at our large campus offices, branches, onsite wellbeing centres, through the insurer's pharmacy network and a home-based screening programme. Employees are also encouraged to complete the insurer's online mental health assessment so that they be triaged to the right level of support and enrol on the insurer's mental healthcare programme. Our health insurer offers consultation with a dietitian and biokineticist for employees who are identified as medium to high risk of lifestyle disease during their personal health assessment.

6 911
employees accessed health screening

5 800
employees participated in HIV counselling and testing

4 223
employees completed a mental health assessment

Financial wellbeing

We continued to offer employees opportunities to strengthen their personal financial management capabilities and provided financial wellbeing coaching through the Employee Assistance Programme.

- Over **4 800** employees participated in financial literacy training.

Mental wellbeing

We provide proactive education and training on mental health awareness, stress management, building personal resilience, and dealing with change and work-life balance. Our People and Culture teams work with business areas where risk is identified, to develop appropriate solutions.

Employees are encouraged to access support when they require it. This includes help to develop coping skills and strategies to manage personal and work-related stress, and advice to help them strengthen their resilience, practice self-care and prioritise their health and wellbeing.

- Over **30 000** employees participated in mental health awareness and training sessions across the group.

In South Africa, we track the impact of mental health concerns on job performance and productivity through our employee wellbeing service provider.

- The proportion of mental health issues that had a severe to significant impact on job performance decreased from 80% in 2023 to 66% in 2024, indicating that our employees are accessing support at an early stage and are potentially better equipped with knowledge and skills to manage their mental health challenges.

Our Employee Assistance Programme offers confidential, personal support and information to our people and their immediate dependents at no cost.

- More than **10 000** employees across 18 countries accessed counselling and support in 2024.

Wellbeing literacy for leaders

Leaders play a critical role in creating the right conditions for their team members to thrive, including ensuring employee wellbeing. We continued to support leaders to strengthen their capability to engage in wellbeing check-ins and mental health conversations with their employees by offering access to wellbeing coaching and mental health training. Levels of employee participation in our wellbeing programmes are well above the benchmark for the financial services sector in Africa.

Sick absence management

Employee wellbeing is an important factor in the productivity and performance of an organisation. The group's sick absence management framework aims to identify and support employees with wellbeing matters that have the potential to impact their performance, attendance and productivity.

Average sick absence days per employee
2.6
(2.6 in 2023)

Average number of sick days per incident
2.9
(2.8 in 2023)

Absenteeism ratio[1]
1.5✓
(1.4 in 2023).

We track the percentage of employees we consider at risk as a result of sick absenteeism trends against specific industry-accepted risk indicators. This figure was **4.6%** of employees in 2024 (4.4% in 2023)[2].

1 Ratio of expected workdays that are lost to total absence days.
2 Note that the sick absenteeism metric excludes Liberty employees.

Occupational health and safety

Standard Bank's occupational health and safety (OHS) policy ensures the provision of a healthy and safe workplace for our employees, contractors, clients, visitors and other relevant individuals.

We comply with all applicable legislation, regulatory standards and supervisory requirements. We implement a range of programmes to keep our employees and visitors safe and maintain high standards of care in all our operations.

Governance

- At board level, the group social, ethics and sustainability committee provides oversight of the group's safety, health and environmental performance in relation to our own operations.
- At executive level, the group safety, health and environment risk oversight committee (SHEROC) provides oversight of all OHS and work environment-related matters.
- The group's OHS system and policy are designed to align with ISO 14001:2015 Environmental Management Systems and ISO 45001:2018 Occupational Health and Safety Management standards. SHEROC reviews the group's OHS system and policy every two years to ensure compliance with emerging regulations and global best practices and standards. Policy changes are approved by the group compliance committee.

South Africa

In **South Africa**, the SBSA chief executive holds ultimate responsibility for the safety of all employees, contractors and visitors to our premises, as mandated by the OHS Act 85 of 1993.

The SBSA CEO appoints OHS employer officials, who are tasked with establishing an OHS management structure, including health and safety committees for each site. Group SHE risk is responsible for the implementation of the OHS system and policy.

OHS employer officials appoint and ensure training for OHS employee officials, including health and safety representatives, first aiders, firefighters, evacuation wardens, and evacuation chair operators. SBSA has a collective agreement on OHS with SASBO, the primary trade union for South Africa's financial sector, which governs engagement of OHS employee officials regarding terms of office, removal from office, and related matters. We have refreshed the SBSA OHS minimum guidelines to ensure that we remain compliant with requirements in respect of OHS employee officials in the context of a hybrid work environment.

Health and safety committees meet at least quarterly at each site. Meetings provide a platform to discuss OHS matters and upcoming projects or events that may impact OHS. Employee health and safety representatives report back to management and OHS committee members during these mandatory meetings.

Africa Regions

Our legal entities in **Africa Regions** have their own governance structures and policies, based on national regulatory requirements and OHS standards. These must comply with national requirements or the group's minimum standards, whichever is more stringent.

Group SHE risk provides support to relevant teams and governance structures in legal entities, in areas such as:

- OHS advisory services
- Development of risk-based OHS strategies
- Establishment of appropriate governance structures
- Facilitation of incident management and emergency preparedness
- Tailored training programmes
- Site visits
- Compliance in projects and contractor management
- Collaborative engagement through regular sessions with OHS practitioners.

These initiatives help foster a safe working environment across the group's operations.

Employee responsibilities

Health and safety is everyone's responsibility.
We require all group employees to:

- Be aware of and understand the hazards and risks associated with their jobs and their work areas
- Take reasonable care for the health and safety of themselves and other persons who may be affected by their acts or omissions at the workplace and while working remotely
- Comply with all applicable health and safety policies and procedures and follow safe work procedures as defined for any hazardous task
- Comply with all instructions issued to prevent OHS risks and incidents, including participation in OHS programmes and initiatives and emergency evacuation exercises
- Complete mandatory OHS compliance training on our online learning platform every two years
- Promptly report any OHS hazards in their workplace
- Report any work-related injuries sustained or diseases contracted in the working environment to their supervisors or line management.

Training

- All employees can access relevant OHS information on the group's intranet
- We continuously engage with employees through structured awareness sessions, to ensure that they are well-versed in OHS principles and have the necessary information and knowledge to maintain a safe and compliant work environment
- We provide specialised training for employee OHS representatives, and firefighting, first-aid, emergency and evacuation wardens, which is provided by external service providers.

Course	Employees trained in 2023	Employees trained in 2024
Emergency Evacuation and Procedures	453	**380**
Fire Fight Foundation	510	**594**
First Aider	467	**410**
OHS Rep	364	**528**
Evacuation Chair	172	**370**

Third-party responsibilities

We use the group's third-party risk tool to assess OHS risks during the onboarding of third parties. We inform our service providers and contractors about their health and safety responsibilities and how their activities may impact our operations. OHS clauses are included in contracts as needed.

Support and emergency preparedness

- The group SHE risk management team undertakes regular support visits across the group's sites and campuses. **Eight support visits** were conducted in 2024.
- Emergency preparedness is essential for safeguarding our employees during unforeseen events. The group SHE risk management team, in collaboration with group physical security, local incident management teams and other relevant stakeholders, conduct regular evacuations and evacuation walkthroughs. These activities help employees familiarise themselves with exit routes, thereby enhancing their safety. We require a minimum of two evacuation drills to be conducted annually.
- The group's national emergency number can be used by any employee in South Africa to access medical assistance.

Monitoring

- Each business unit's OHS representative is required to conduct quarterly site inspections (unless a different schedule is agreed upon) to identify and mitigate potential risks.
- The group compliance monitoring team conducts OHS reviews. **Reviews were conducted at six of our main campus buildings in 2024.** Action items were identified, tracked and monitored for completion in collaboration with group SHE risk management and the impacted business areas.
- Each business area must report OHS metrics. OHS incidents are investigated by the relevant manager and OHS representatives, with guidance from SHE Risk. Information on incidents, injuries, and ill-health is collected at the group level and reviewed quarterly by SHEROC, which also reviews risk mitigation strategies.

	2023	2024
Evacuation walkthroughs	13	**28**
Evacuation drills	860	**1 092**
Facility inspections	6	**1**

Incidents

Standard Bank has a Letter of Good Standing and has remained in good standing with the Compensation Fund for occupational illnesses and injuries.

Year	2023	2024
Total no. of injuries (IOD) on duty	65	**110**
Total no. of occupational diseases	0	**2**
Total no. of contractor incidents	0	**18**
Total no. of IOD fatalities	0	**1***
Person days lost to injury	373	**458**
Medical treatment cases	26	**38**

* Employee Fatality.

Inspections

South Africa's Department of Employment and Labour conducts routine inspections at SBSA sites. In 2024, the department conducted 61 site inspections. These inspections assess compliance with regulatory requirements. Four minor contravention notices were issued and resolved.

We use a risk-based approach when conducting ergonomics assessments at our premises, in line with our continuous efforts to reduce the risk of injury or strain at work.

International standards

Standard Bank is subscribed to WELL at scale, the leading global programme that places people's health, wellbeing and safety at the forefront of business decision-making. We align with and undergo third-party verification of key strategies within the WELL Standard, the world's most comprehensive set of evidence-based steps to foster health and well-being in buildings, organisations and communities. 15 of SBG's real estate professionals are certified WELL Accredited Professionals, responsible for embedding the standard into SBG's day-to-day operations. We have adopted International Well Building Institute (IWBI) standards for indoor air quality. All our commercial offices, data centres and seven of our retail sites have GreenFlag certification[1].

[1] The GreenFlag Association is a third-party validation body approved by the South African National Accreditation System (SANAS) to assess and issue certification to facilities that meet stringent air quality standards, using levels of CO_2 as an indicator of indoor air quality. Facilities are continuously monitored for CO_2 and must perform above the acceptable levels of 800 parts per million (ppm).

Resource management – own operations

The group complies with all relevant environmental laws and regulations.

We recognise our responsibility to safeguard the environment by preventing pollution, reducing our energy, water, waste, and carbon footprints, and fostering the wellbeing of all those affected by our activities. We align with the highest standards of resource and environmental management, as outlined in our sustainable natural resource management policy.

We are working to decarbonise our own operations and ensure the resilience of our operations to physical and transition risk. We have set a target to achieve net zero for newly built facilities by 2030, and for existing facilities by 2040, across our countries of operation. In 2024, we expanded the scope of our emissions reporting and targets to include our Africa regions and Liberty portfolios, building on the significant progress achieved in South Africa. Our target follows a sector-based hybrid approach, aligning sector-specific emissions pathways with broader organisational reduction strategies, aiming to reduce emissions by 8% compared to the 2023 baseline for the group. Further details on our progress and future plans are available in our **Climate-related financial disclosures report**.

We are committed to:

Continual improvement of energy, water, waste and carbon performance	Effective data collection and continuous improvement of data quality to inform targets and track progress
Considering energy and water performance improvements in design and modification of new and existing facilities, equipment, systems and processes	Procurement and use of energy and water efficient products and services
Reporting on the effectiveness of the resource management system to relevant management committees	Communicating the importance of effectively managing resource consumption to our employees and other relevant stakeholders

Physical security

Standard Bank depends on an effective security management programme to protect our people, products, assets and reputation. We are committed to act within national laws and in a manner that respects human rights.

Standard Bank adopted a group physical security code of conduct and physical security policy in April 2024.

The code of conduct and policy affirm the group's responsibility to respect the human rights of all those affected by our business activities, including security personnel, clients, suppliers, visitors to our buildings and community members. We require all security personnel to operate in accordance with applicable laws and regulations, respect human rights, treat all people with respect and dignity and protect the interests of all stakeholders. We respect internationally recognised human rights, including the rights to freedom of expression, association, and peaceful assembly and the right to protection from arbitrary or unlawful interference with privacy or deprivation of property. We require all security personnel to treat all persons humanely and with respect for their dignity and privacy. We focus on prevention of incidents as a priority. Any breach of the code or policy must be reported via the incident reporting procedure.

Group physical security is responsible for implementing, maintaining and continuously improving security management, including creating awareness of security risks to people and property, conducting vulnerability and threat assessments of all work areas to identify, prioritise and manage security risks, and ensuring compliance with and continual improvement of security control mechanisms. We review our policies and performance on a regular basis to ensure appropriateness and effectiveness.

We require all security personnel, and all subcontractors or other parties carrying out security services under contract, to operate in accordance with the code and policy. We also ensure that all personnel performing security services are made aware, at induction, in their manual, and at ongoing professional training, of the PSIRA Code, and all other applicable international and relevant laws and standards.

6

CORPORATE SOCIAL INVESTMENT

CSI | FUNDING FOR CIVIL SOCIETY ORGANISATIONS AND SPONSORSHIPS | POLITICAL PARTY FUNDING

CORPORATE SOCIAL INVESTMENT

Standard Bank Group's CSI framework aligns with the group's focus on driving inclusive and sustainable economic development, and the group's positive impact value driver.

Our countries of operation are responsible for developing their CSI policies and plans within the group CSI framework, prioritising areas according to local need. Different countries have different focus areas and delivery models. In all cases, we work closely with government departments and other social partners to understand priority needs, and partner with local agencies and community organisations to ensure effective and sustainable delivery of our programmes.

Our CSI strategy incorporates:

Community development projects, in which we contract with NGO partners to undertake longer term interventions in line with our impact areas

Charitable donations on an ad hoc and responsive basis, including disaster relief and humanitarian relief

Employee community involvement and contributions, including donations and volunteering of time and skills.

Governance

Countries are responsible for developing appropriate governance structures, management structures and reporting processes, ensuring that CSI delivers shared value to the group and the communities within which we operate, and putting in place policies and processes to manage any potential conflicts of interest. Countries are required to report to group on their CSI programmes and spending. These reports are collated and submitted to the group social, ethics and sustainability committee.

Countries may choose to establish charitable entities, such as trusts or foundations, to deliver CSI programmes. The establishment of such entities must be approved by the group social, ethics and sustainability committee, and must align with group guidelines for establishment of such entities, and all relevant local regulatory requirements.

CSI spending

Our CSI budget is calculated by each country of operation as 1% of net profit after tax (NPAT) of the previous year. In South Africa, 0.6% of NPAT is allocated to CSI and 0.4% to consumer education. In 2024, we spent **R143 million on CSI in South Africa** and **R114.8 million on CSI in Africa Regions**.

In South Africa, our focus is on education programmes, and particularly on early childhood development (ECD). We also contribute to disaster and humanitarian relief as needed, and employee community involvement initiatives.

Many of our legal entities have made improving **access to quality education** a central pillar of their CSI strategies. Programmes include initiatives to promote digital literacy, initiatives to promote gender equality and encourage girls to pursue education and careers in STEM fields, school-level programmes to encourage and support entrepreneurship, scholarships for tertiary education, and the provision of laptops to learners. We also provide skills development and financial education for entrepreneurs and small business owners.

In countries such as Tanzania and Uganda, we focus on improving **access to quality healthcare**. Initiatives include financing new facilities and provision of equipment, and campaigns to encourage awareness and screening.

In several countries, we have partnered with governments and NGOs to promote the **conservation and restoration of the natural environment**. Programmes include large-scale tree planting initiatives, community engagements to encourage sustainable use of natural resources, and work with small-scale farmers to promote environmental conservation efforts.

Details of some of these programmes can be found in our **Report to society.**

We are committed to supporting our communities when they need us most. We partner with community-based organisations to provide disaster and humanitarian relief to impacted communities, in the aftermath of crisis events.

Funding for civil society organisations and sponsorships

Group guidelines govern the provision of funding to specific categories of external stakeholders. Membership contributions and charitable donations on behalf of the group may only be offered or given in accordance with the principles set out in various policies and/or guidelines relevant to the offering or giving of such payments. Guidelines are in place to guard against the risk that any contributions could be used inappropriately, by the bank, our employees or third parties to obtain business advantage. Policies for the funding of civil society organisations are determined at country level.

Funding for civil society organisations

In South Africa, the expanded democracy support programme guidelines govern the assessment of funding requests and the provision of financial support to civil society organisations. They ensure consistency in the assessment, management and outcomes of funding requests and compliance with applicable statutory and regulatory obligations and the group values and code of ethics and conduct, while guarding against the risk that such contributions be used inappropriately to obtain business advantage. The programme provides funding for organisations focused on promoting good governance and social justice, challenging corruption, advocating for protection of human rights, promoting dialogue and promoting independent journalism. Organisations are funded for a three-year period.

In 2024, we provided **R500 000 each to eight organisations**, totalling R4 million.

Political party funding

We do not provide funding directly to political parties in any of our countries of operation. In South Africa, our democracy support programme provides for the provision of funding directly to the Independent Electoral Commission (IEC), in line with arrangements provided for in the Political Party Funding Act 6 of 2018. The IEC distributes the funds it receives to all parties represented in parliament, based on a formula provided by the Act. Political parties receive no other financial support from SBG. Our democracy support programme is approved by the SBG board and reviewed every five years.

In 2024, we donated R5 million to the IEC.

Sponsorships

The group sponsorship policy governs all sponsorships undertaken by the group. We define sponsorship as a commercially viable investment of cash, product or in-kind support with a rights holder, for which the bank receives quantifiable commercial rights in return. Due diligence is carried out on rights holders prior to contracting to ensure entities are of impeccable integrity and reputationally sound. 2024 marked significant milestones for the group. The National Arts Festival celebrated its 50th anniversary, with Standard Bank proudly supporting it for 40 of those years. The Standard Bank Joy of Jazz celebrated its 25th year, continuing to showcase the finest South African jazz talent while welcoming global icons to share our stages.

At group level, we spent **R26.4 million** on sponsorships in 2024 (this excludes sponsorships managed by segment).

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APPENDICES

SELECTED POLICY SUMMARIES | ASSURANCE REPORT

APPENDICES

Selected policy summaries

Corporate citizenship	**Code of Ethics and Conduct** **Human rights statement** **Stakeholder engagement policy** **Expanded democracy support programme policy** **Sponsorship policy** **Corporate social investment policy**
Compliance	**Anti-bribery and corruption policy** **Conflict of interest policy** **Financial sanctions, counter terrorist financing (CTF) and counter proliferation financing (CPF) policy** **Money laundering and terrorist financing control policy** **Facilitation of tax evasion prevention policy** **Occupational health and safety policy**
People and culture	**Harassment: sexual and other** **Discrimination in the workplace policy** **Transformation policy**
Conduct risk	**Conduct risk policy**
Environmental and social risk	**Climate policy**
Information risk	**Information risk policy**

Assurance report

Independent Auditor's limited Assurance Report on the Selected Sustainability Information in Standard Bank Group Limited's Report to Society 2024, Sustainability Disclosures Report 2024 and Climate-Related Financial Disclosures Report 2024

To the Directors of Standard Bank Group Limited

We have undertaken a limited assurance engagement in respect of the selected sustainability information, as described below, and presented in the Report to Society 2024, Sustainability Disclosures Report 2024 and Climate-Related Financial Disclosures Report 2024 of Standard Bank Group Limited (the "Group", " SGB" or " you") (the "Reports") for the year ended 31 December 2024. This engagement was conducted by a multidisciplinary team including social, environmental and assurance specialists with relevant experience in sustainability reporting.

Subject Matter

We have been engaged to provide a limited assurance conclusion in our report on the following selected sustainability information, marked with a '✓' on the relevant pages in the Standard Bank Group Limited's Report to Society 2024 (SBG RTS), Sustainability Disclosures Report 2024 (SBG SD) and Climate-Related Financial Disclosures Report 2024 (SBG CR). The selected sustainability information described below have been prepared in accordance with the Company's reporting criteria that accompanies the sustainability information on the relevant pages of the Report (the accompanying reporting criteria).

Nr	Selected Sustainability Information	Unit of Measurement	Boundary	Report and Pages
1	Materiality assessment process aligned with double-materiality approach	Management assertion	SBG	SBG SD: Page 10
2	Verification of existence of independent whistleblowing reporting channel	Management assertion	SBG	SBG SD: Page 42 SBG SD: Page 49 SBG SD: Page 50 SBG SD: Page 55 SBG SD: Page 56 SBG SD: Page 58 SBG SD: Page 59 SBG SD: Page 60 SBG SD: Page 83

Nr	Selected Sustainability Information	Unit of Measurement	Boundary	Report and Pages
Employment				
3	African representation at senior management level in South Africa (executive and senior manager employees based in SA)	%	The Standard Bank of South Africa Limited (SBSA) and Liberty South African Operations (LSA)	SBG SD: Page 13 SBG SD: Page 16 SBG SD: Page 79
4	Percentage of black women in senior management	%	The Standard Bank of South Africa Limited (SBSA) and Liberty South African Operations (LSA)	SBG SD: Page 81
5	Employee voluntary turnover rate	%	SBG excluding Liberty Africa regions	SBG SD: Page 13 SBG SD: Page 16 SBG SD: Page 79 SBG SD: Page 91
6	Percentage of women in: Executive management & Senior management	%	SBG	SBG SD: Page 13 SBG SD: Page 16 SBG SD: Page 79 SBG SD: Page 81
Human Capital				
7	Percentage of women on the SBG board	%	SBG board only	SBG SD: Page 81
8	Percentage of women Chief Executive Officers in Africa Regions and Off-shore	%	SBG	SBG SD: Page 81
9	Absenteeism ratio – The ratio of expected workdays that are lost to total absence days	Ratio	SBG	SBG SD: Page 96

Nr	Selected Sustainability Information	Unit of Measurement	Boundary	Report and Pages
Financial Inclusion				
10	Number of affordable housing clients where the bank restructured accounts within the reporting period	#	SBSA	SBG RTS: Page 16
11	Total number of students who received funding by FEENIX in the reporting year	#	SBSA	SBG RTS: Page 13
Environmental, Sustainability and Climate Change mitigation and adoption				
12	Total number of Equator Principles projects that reached financial close within the reporting year	#	SBG	SBG SD: Page 43
13	Total carbon footprint for the reporting year	tCO_2e	SBG	SBG CR: Page 34
14	Total renewable energy produced/purchased	MWh	SBG	SBG CR: Page 35
Issuances under the SBG Sustainable Finance Framework				
15	For all bonds issued off the SBF and SFF: limited assurance on management of proceeds and allocation of proceeds as set out in the SFF	Management assertion	SBG	SBG SD: Page 31
16	For all bonds issued off the SBF and SFF: limited assurance on allocation of proceeds	% allocation per bond	SBG	SBG SD: Page 31
17	Mobilisation of Sustainable Finance: FY of reporting & Cumulative (FY2022 to FY of reporting)	ZAR billion	SBG	SBG SD: Page 13 SBG SD: Page 30 SBG CR: Page 4 SBG CR: Page 6 SBG CR: Page 9
18	Committed financing of and investment in Renewable Energy Power Plants: FY of reporting & Cumulative (FY2022 to FY of reporting)	ZAR billion	SBG	SBG SD: Page 13 SBG SD: Page 30 SBG RTS: Page 6 SBG RTS: Page 47 SBG RTS: Page 48 SBG CR: Page 10
19	Committed financing of and investment in Social Projects: FY of reporting	ZAR billion/ annum	SBG	SBG SD: Page 30

We refer to this information as the "selected sustainability information".

Your responsibilities

The Directors are responsible for the selection, preparation and presentation of the selected sustainability information in accordance with the accompanying reporting criteria as set out **here**. (the "Reporting Criteria").

This responsibility includes:

- the identification of stakeholders and stakeholder requirements, material issues, commitments with respect to sustainability performance, and
- the design, implementation and maintenance of internal control relevant to the preparation of the Reports that is free from material misstatement, whether due to fraud or error.

The Directors are also responsible for determining the appropriateness of the measurement and reporting criteria in view of the intended users of the selected sustainability information and for ensuring that those criteria are publicly available to the Reports users.

Inherent limitations

Non-financial performance information is subject to more inherent limitations than financial information, given the characteristics of the subject matter and the methods used for determining, calculating, sampling and estimating such information. The absence of a significant body of established practices on which to draw allows for the selection of different but acceptable measurement techniques which can result in materially different measurements and can impact comparability. Qualitative interpretations of relevance, materiality and the accuracy of data are subject to individual assumptions and judgements. The precision of different measurement techniques may also vary. Furthermore, the nature and methods used to determine such information, as well as the measurement criteria and the precision thereof, may change over time.

In particular, where the information relies on carbon and other emissions conversion factors derived by independent third parties, or internal laboratory results, our assurance work will not include examination of the derivation of those factors and other third party or laboratory information.

Our Independence and Quality Management

We have complied with the independence and other ethical requirements of the *Code of Professional Conduct for Registered Auditors*, issued by the Independent Regulatory Board for Auditors' (IRBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. The IRBA Code is consistent with the corresponding sections of the *International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards)*.

The firm applies the International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, which requires the firm to design, implement and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our responsibility

Our responsibility is to express a limited assurance conclusion on the selected sustainability information based on the procedures we have performed and the evidence we have obtained. We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements 3000 (Revised), *Assurance Engagements other than Audits or Reviews of Historical Financial Information* (ISAE 3000 (Revised)), and, in respect of greenhouse gas emissions, International Standard on Assurance Engagements 3410, *Assurance Engagements on Greenhouse Gas Statements* (ISAE 3410) issued by the International Auditing and Assurance Standards Board. These Standards require that we plan and perform our engagement to obtain limited assurance about whether the selected sustainability information are free from material misstatement.

A limited assurance engagement undertaken in accordance with ISAE 3000 (Revised), and ISAE 3410, involves assessing the suitability in the circumstances of the Company's use of its reporting criteria as the basis of preparation for the selected KPIs, assessing the risks of material misstatement of the selected sustainability information whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the selected sustainability information. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks. The procedures we performed were based on our professional judgement and included inquiries, observation of processes followed, inspection of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

Given the circumstances of the engagement, in performing the procedures listed above we:

- Interviewed management and senior executives to obtain an understanding of the internal control environment, risk assessment process and information systems relevant to the sustainability reporting process;
- Inspected documentation to corroborate the statements of management and senior executives in our interviews;
- Tested the processes and systems to generate, collate, aggregate, monitor and report the selected sustainability information;
- Performed a controls walkthrough of identified key controls;
- Inspected supporting documentation on a sample basis and performed analytical procedures to evaluate the data generation and reporting processes against the reporting criteria;
- Evaluated the reasonableness and appropriateness of significant estimates and judgements made by the directors in the preparation of the selected sustainability information; and
- Evaluated whether the selected sustainability information presented in the Reports are consistent with our overall knowledge and experience of sustainability management and performance at the Company.

The procedures performed in a limited assurance engagement vary in nature and timing, and are less in extent than for a reasonable assurance engagement. As a result the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether the Company's selected sustainability information have been prepared, in all material respects, in accordance with the accompanying Company's reporting criteria.

Limited Assurance Conclusion

Based on the procedures we have performed and the evidence we have obtained, and subject to the inherent limitations outlined elsewhere in this report, nothing has come to our attention that causes us to believe that the selected sustainability information as set out in the Subject Matter paragraph above for the year ended 31 December 2024 are not prepared, in all material respects, in accordance with the reporting criteria.

Other Matters

Our report includes the provision of limited assurance on:

- Materiality assessment process aligned with double-materiality approach; and
- Verification of existence of independent whistleblowing reporting channel.

We were previously not required to provide assurance on these selected sustainability information.

The maintenance and integrity of Standard Bank Group Limited's website is the responsibility of Standard Bank Group Limited directors. Our procedures did not involve consideration of these matters and, accordingly we accept no responsibility for any changes to either the information in the Reports or our independent assurance report that may have occurred since the initial date of presentation on Standard Bank Group Limited's website.

Restriction of liability

Our work has been undertaken to enable us to express a limited assurance conclusion on the selected sustainability information to the directors of the Company in accordance with the terms of our engagement, and for no other purpose. We do not accept or assume liability to any party other than the Company, for our work, for this report, or for the conclusion we have reached.

PricewaterhouseCoopers Inc.

PricewaterhouseCoopers Inc.

Director: Jameel Essop
Registered Auditor
PwC Johannesburg
4 Lisbon Lane Waterfall City
28 March 2025

Standard Bank

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