

Type:	<i>Policy Summary</i>
Name:	Conduct Risk
Key search terms:	Client Risk/ Ethics/ Business Practice/ Conduct Risk Governance

## 1 Policy Statement

The Standard Bank Group's (the Group's) purpose is to drive Africa's growth. Achieving this purpose depends on our reputation as a trusted partner across Africa. Our Values and Code of Ethics and Conduct shape our organisational culture and guide our behaviours. They determine how we do business, as individuals and as an organisation. The group requires all employees, associated persons and third parties to act honestly and with integrity in all personal, business and client activities.

Conduct risk is defined as 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.

The Group has no tolerance for illegal, unethical or dishonest behaviour. We strive to meet clients' expectations for fair outcomes and market integrity by doing the right business the right way. It is expected that every employee will uphold the highest level of integrity and take accountability for their actions in line with our values and Code of Ethics and Conduct, thereby upholding the trust of our stakeholders.

## 2 Policy Scope

This policy applies to all employees, business units and corporate functions of the group and is supported by other policies and standards. This policy reflects the group's minimum

requirements and may be supplemented in a local jurisdictional business policy or procedure.

### **3 Purpose of the policy**

The purpose of the Conduct Risk policy is to articulate a standardised approach to manage Conduct Risk within the group

The policy ensures that we monitor and oversee conduct risk effectively; that conduct risk governance arrangements are in place; that roles and responsibilities are clear; and business is conducted in line with industry standards and relevant regulatory requirements. It sets out the requirements for the timely identification, reporting, escalation, and remediation when conduct risk is identified.

### **4 Roles and Responsibilities**

We manage conduct risk in accordance with our conduct risk management framework, which defines the group's conduct risk appetite and informs the approach to managing and mitigating misconduct. Business areas submit quarterly conduct dashboards to executive management. The dashboards include leading and lagging indicators and provide a balanced perspective of positive and negative culture indicators. The dashboards are also submitted quarterly to the social and ethics management committee and social and ethics board committee. Where deficiencies are identified, immediate remedial action is taken. We continue to identify metrics and mitigation measures to improve the responsiveness and effectiveness of conduct risk controls.