



**BANK OF INDUSTRY**

*...transforming Nigeria's industrial sector.*

**ANTI-BRIBERY  
AND  
CORRUPTION  
POLICY**

Doc. No: BOI/PM/ABCP/300

Revision No: 1

Prepared by: Internal Control and Compliance Division

Reviewed by: EMC

Approved by: Board of Directors

Last Review Date: 20/02/2020

**ANTI-BRIBERY  
AND  
CORRUPTION  
POLICY**

1	20/02/2020	Policy Manual Review	Internal Control and Compliance Division	EMC	Board of Directors
<b>Revision</b>	<b>Date</b>	<b>Purpose</b>	<b>Prepared by</b>	<b>Checked by</b>	<b>Approved by</b>



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**CONFIDENTIALITY STATEMENT**

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### **ANTI-BRIBERY AND ANTI-CORRUPTION STATEMENT**

Bank of Industry (BOI) Limited is committed to full compliance with the spirit and letters of the Anti-Bribery and Corruption (ABC) Laws, applicable Regulations, International Standards and best practices.

The Bank shall relate with customers whose sources of wealth and purpose of transactions can reasonably be established to be legitimate.

Ethical and legal considerations shall guide every commercial decision. Employees of the Bank and third parties shall fully understand and be guided by these standards.

The Bank shall take all reasonable care to prevent its products and services from being used for the purpose of Bribery, Corruption or for perpetration of other crimes.

The Bank shall co-operate with the Regulatory Authorities and maintain the highest ethical standards to advance the interest of all its stakeholders in the conduct of its business.

**Managing Director/Chief Executive Officer**



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## **1.0 INTRODUCTION**

### **1.1 PREAMBLE**

The anti-bribery and corruption policy sets out BOI's procedures to guide the conducts of its business and to prevent acts likely to compromise its operations.

This policy provides guidance on acceptable behaviour to which all staff and related parties of the Bank must adhere to. The policy is designed to identify prohibited activities as well as provide guidance in the face of uncertainties.

### **1.2 BOI'S VISION**

To be Africa's leading Development Finance Institution operating under global best practices.

### **1.3 BOI'S MISSION**

To transform Nigeria's industrial sector by providing financial and business support services to enterprises.

### **1.4 BOI'S MANDATE**

Providing financial assistance for the establishment of large, medium and small companies as well as expansion, diversification and modernization of existing enterprises and rehabilitation of ailing industries.

### **1.5 BOI'S CORE VALUES**

- (i) Service.
- (ii) Professionalism.
- (iii) Passion.
- (iv) Integrity.
- (v) Resourcefulness.



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- (vi) Innovation
- (vii) Team Spirit.

### **1.6 GENERAL PROVISIONS**

This document contains the Anti-Bribery and Corruption policy of the Bank of Industry Limited (hereafter referred to as "BOI" or the "Bank").

BOI's ABC Policy is designed to ensure that there are appropriate systems in place to prevent, promptly detect and report cases or activities of Bribery and Corruption within the Bank. All the Bank's employees shall be familiar with and make use of the information contained in this Policy.

The defined procedures, processes, and controls contained herein which are risk-based shall be strictly adhered to in the conduct of the Bank's businesses. In the event that any section is to be amended due to change in regulation, law, or for pure business reasons, Internal Control and Compliance shall evaluate the associated risk and if deemed necessary effect the changes by making the necessary addendum. Changes occasioned by regulations shall be recommended to the Board for approval.

### **1.7 REVIEW OF ABC POLICY**

The review of this document will be necessitated by changes in applicable laws, regulations, policies and the environment.

### **1.8 APPLICATION OF THE POLICY**

The Policy shall apply to the Board, Management, Staff, consultants, contractors and their family members (stakeholders) as will be appropriately contained in the terms of service to all parties.



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The policy extends across all the Bank's relationship with customers, all transactions including occasional transactions and those not involving movement of funds such as advisory services, financial activities of staff and directors and any other party with whom the Bank does business. Where uncertainties and ambiguity exists, the Chief Compliance Officer will provide professional guidance.

### **1.9 OBJECTIVES**

The Policy is designed to identify, prevent and minimize the likely occurrence of cases of Bribery and Corruption in the conduct of the Bank's businesses. The Policy seeks to institutionalize a uniform understanding among the Stakeholders of the essence of corruption actions, their forms and manifestations, in order to prevent circumstances that may potentially violate the requirements of anti-corruption legislation and other applicable laws.

Key objectives of the anti-corruption policy of the Bank includes the following:

- (i) Establishment of anti-corruption principles and rules for the Bank;
- (ii) Creation of effective mechanisms, procedures, controls and other measures aimed at preventing corruption and minimizing the risks of involving the Stakeholders in corrupt activities;
- (iii) Integration of anti-bribery and corruption principles into strategic and operational management at all levels of the Bank's activities;
- (iv) Formation of common understanding of the Policy by Stakeholders of the Bank;
- (v) Drawing attention of Stakeholders of the Bank to the Policy;



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## **1.10 SCOPE**

The Policy focuses primarily on Anti-Bribery and Corruption issues. It shall take cognisance of the provisions of relevant laws and regulations as may be enacted from time to time.

## **1.11 POLICY OWNERSHIP**

- (i) The overall ownership of this document rests with the Board of Directors.
- (ii) The custodian of the Policy and day to day implementation rests with the Chief Compliance Officer (CCO).

## **2.0 BRIBERY AND CORRUPTION**

### **2.1 DEFINITION OF BRIBERY AND CORRUPTION**

#### **2.1.1 BRIBERY**

Bribery is defined by the Black's Law Dictionary as the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty.

The bribe is the gift bestowed to influence the recipient's conduct. It may be any money, good, right in action, property, preferment, privilege, emolument, object of value, advantage, or merely a promise or undertaking to induce or influence the action, vote, or influence of a person in an official or public capacity.

It involves promising, offering, giving, accepting or soliciting gratification or something of value to/from someone who has influence or is otherwise employed in business (such as managers, buyers, other employees, representatives or journalists) or in government or public enterprises (such as politicians, public officers, other public officials or employees of public bodies or enterprises) in order to induce or obtain a private or commercial advantage or to influence decision making illegally.





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Section 2 of the Corrupt Practices and Other Related Offences Act No 5, Laws of the Federation of Nigeria 2000, defined Gratification as:

- (i) Money, donation, gift, loan, fee, reward, valuable security, property or interest in property of any description whether movable or immovable, or any other similar advantage, given or promised to any person with intent to influence such a person in the performance or non-performance of his duties.
- (ii) Any office, dignity, employment, contract of empowerment, or services and any agreement to give employment or render services in any capacity'
- (iii) Any payment, release, discharge or liquidation of any loan, obligation or other liability whether in whole or in part;
- (iv) Any valuable consideration of any kind , any discount, commission, rebate, bonus, deduction or percentage:
- (v) Any forbearance to demand any money or money's worth or valuable thing
- (vi) Any other service or favor of any description, such as protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not, already instituted and including the exercise or the of forbearance from the exercise of any rights or any official power or duty; and
- (vii) Any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the proceeding paragraphs.

### **2.1.2 CORRUPTION**

The Black's Law Dictionary defines corruption as "the act of doing something with an intent to give some advantage inconsistent with official duty and the rights of others, a fiduciary or official use of a station or office to procure some benefit either personally or for someone else, contrary to the rights of others...an impairment of integrity, virtue or moral principles; especially impairment of a public official's duty by bribery."

It is a vicious and fraudulent intention to evade the prohibitions of the law. An act of an official or fiduciary person who unlawfully and wrongfully uses his station or character to procure some benefit for himself or for another person, contrary to duty and the rights of others. It involves 'the illegal use of entrusted power or position of authority for private



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gain, and a form of dishonesty or criminal offence which includes embezzlement, extortion, kickbacks, facilitation payment and many more, on different scales.

### **2.2 FORMS OF BRIBERY AND CORRUPTION**

Bribery and Corruption can take any or combination of the following forms:

- (i) When a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly; or
- (ii) When a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately.
- (iii) it does not matter whether the bribe is given or received directly or through a third party; or for the benefit of the recipient or some other person.
- (iv) Bribe is often perceived only as cash gifts, however bribery and corruption includes but is not limited to the following:
  - (a) money (or cash equivalent such as shares);
  - (b) unreasonable gifts, entertainment or hospitality;
  - (c) kickbacks (i.e. payments of a portion of a contract made to an employee or contractor in return for a business favour or advantage);
  - (d) unwarranted rebates or excessive commissions
  - (e) agents or marketing agents;
  - (f) unwarranted allowances or expenses;
  - (g) "facilitation" payments/payments made to perform their normal job more quickly and/or priorities a particular customer;
  - (h) political/charitable contributions;
  - (i) uncompensated use of company services or facilities; or
  - (j) anything else of value that may induce advantage.



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- (v) Employees of the Bank are prohibited from performing or engaging in any of the bribery and corrupt activities listed above.

### **2.3 BRIBERY RED FLAGS / PROHIBITIONS**

In most circumstances, common sense will determine when a bribe is being offered. However, the policy prohibits the following:

- (i) Unusually large payments or provision of any other benefit over and above the cost of the services being performed, for example payment of commission when no significant service has been rendered, a lavish gift, a kickback or a contribution to a charity or political organization.
- (ii) Payment for services to someone other than the service provider.
- (iii) Receiving unreasonable and unjustifiable hospitality or gifts that could cause embarrassment to the person or the organisation when disclosed.
- (iv) Payment or other benefit being offered or received to induce or reward favourable treatment, to undermine an impartial decision making process or to persuade someone to do something that would not be in the proper performance of their job.
- (v) Dealing with individuals / organisations with poor reputation or affiliations with non-reputable organisations.
- (vi) Cash payments or any payment with no paper / electronic trail to deliberately bypass normal internal control systems.

### **3.0 THE IMPORTANCE OF ANTI-BRIBERY AND CORRUPTION POLICY TO BANK OF INDUSTRY**

**3.1** Bank of Industry considers violation(s) of its anti-bribery and anti-corruption rules a grave offence as bribery and corruption could:

- (i) Negatively impact social, economic and environmental development;



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- (ii) Undermine societal trust;
- (iii) Divert resources to improper purposes;
- (iv) Lead to a distortion of the economy, environmental mismanagement and state failures;
- (v) Undermine labour standards; and
- (vi) Restrict access to basic human rights.

**3.2** Any involvement in bribery or corruption is contrary to our values and mandate.

**3.3** Bribery and corruption can cause serious damage to the reputation of Bank of Industry, which may result in declining trust of business partners and, ultimately, loss of business.

Bank of Industry, therefore, expects all Stakeholders to adhere to this Policy. Non-compliance and/or involvement in bribery or corruption, will result in disciplinary action that may lead to dismissal and could result in criminal prosecution.

#### **4.0 ANTI-BRIBERY AND CORRUPTION MEASURES**

**4.1** Anti-Bribery and Corruption measures involves the activities of the Board, Management and Staff of the Bank within their powers, related to the following:

- (i) Intolerance to corrupt manifestations in any form;
- (ii) Corporate and social responsibility in the field of corruption combating;
- (iii) Prevention of corrupt practices;
- (iv) Fighting corruption — identification, prevention, restraint, disclosure and investigation of corrupt practices;
- (v) Mitigation and/or remediation of the consequences of corrupt practices.
- (vi) Prosecution of those involved in corrupt practices.



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- 4.2** To efficiently identify, assess and mitigate corruption risks in the Bank, the following approaches shall be used:
- (i) Obtaining the declared information on incomes, expenses, property and property obligations of certain categories of persons, their spouses and minor children. The above information shall be deemed confidential unless otherwise stipulated by legislation;
  - (ii) Assessing and processing any incoming information on intentions and facts of corruption offenses or any cases of inducing employees to commit a corruption offense;
  - (iii) Establishing the rules for handling gifts and hospitality expenses;
  - (iv) Establishing the procedure for assessing and disclosing information, so as to prevent conflicts of interest, including potential ones;
  - (v) Maintaining full and credible records and documenting all payments performed by the bank;
  - (vi) Establishing procedures for assessing, analysing and selecting counterparties of the bank, as well as rules for interaction with them;
  - (vii) Bringing the rules and requirements of this policy to the attention of all employees of the bank;
  - (viii) Regular training of employees;
  - (ix) Engagement with law enforcement agencies for investigation and possible prosecution of offenders;

### **5.0 ANTI-BRIBERY AND ANTI-CORRUPTION MEASURES IN RELATIONS WITH COUNTERPARTIES**

- 5.1** Requirements of this Policy shall be taken into account when the Bank enters into contractual or other business relations with individuals and legal entities.



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- 5.2** The Bank shall expect from Stakeholders compliance with relevant anti-bribery and corruption laws and regulations.
- 5.3** The Bank takes reasonable steps to mitigate the risk of breach of the applicable anti-corruption legislation. In this regard, the Bank:
- (i) Carries out requisite due diligence on potential counterparties.
  - (ii) Informs potential counterparts about the principles and requirements of the Bank in the field of anti-corruption set forth in the Policy and by posting information on the website of the Bank.
  - (iii) Takes into account the willingness of potential counterparties to comply with the principles and requirements in the field of combating corruption, and to provide mutual assistance to prevent corruption practices in their activities.

## **6.0 KEY ROLES AND FUNCTIONS WITHIN THE ANTI-BRIBERY AND CORRUPTION POLICY**

### **6.1 BOARD OF DIRECTORS**

- (i) Approves the Policy;
- (ii) Bears responsibility to ensure that the Bank's business complies with relevant laws and legislations as well as this policy;
- (iii) Implements the principles of uncompromising attitude to any forms and manifestations of corruption at all levels;
- (iv) Monitors compliance to the policy, including the provision of efficient and prompt resolution of matters.

### **6.2 STAFF OF THE INTERNAL CONTROL AND COMPLIANCE GROUP**

- (i) Identify activities and business processes with a high level of corruption risks and take measures to minimize the risk;



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- (ii) Develop methodology for tackling corruption and take part in the implementation of anti-corruption procedures and measures in the bank;
- (iii) Notify the internal audit and investigation group of identified corrupt practices by the bank employees;
- (iv) Initiate, take part in carrying out official checks and investigations in the field of combating corruption,
- (v) Submit to the board strategy and compliance committee of the bank the cases that are subject to review by such committee.
- (vi) Develop recommendations to the bank's management for eliminating causes and conditions enabling corrupt practices by the bank employees.

### **6.3 STAFF OF THE INTERNAL AUDIT AND INVESTIGATION GROUP**

- (i) Prepare and conduct review of process aimed at preventing corrupt practices by Stakeholders;
- (ii) Review documents relating to the Bank's procurement procedures;
- (iii) Initiate and carry out investigations of alleged corrupt practices;
- (iv) Engage with law enforcement agencies in matters relating to Anti-Corruption issues;
- (v) Undertake measures to protect the Bank's employees from the influence of third parties whose acts aim at organizing corruption schemes and practices in the Bank;
- (vi) Cooperate with the Compliance Division to identify information on the intentions to commit or facts of committing corruption acts by the Bank's employees;

### **6.4 ALL BANK EMPLOYEES**

- (i) Interact with the Bank's Compliance Division on all issues of bribery and corruption;



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- (ii) Strictly abide by the requirements of relevant laws and regulations, as well as best practices in the conduct of the Bank's businesses;
- (iii) Refrain from committing acts and taking decisions that could lead to bribery and corruption offenses;
- (iv) Inform the Compliance Unit about each case of violation of this Policy known to or potential or identified by them and/or report via the "Whistleblowing Hotline";
- (v) In case of any doubt with respect to the permissibility of certain actions or other matters relating to the provisions of this Policy, apply to the immediate supervisor and/or to the Compliance Unit for clarifications;
- (vi) Regardless of their position, all employees of the Bank shall be responsible for complying with the principles and requirements herein, as well as for the acts (omissions to act) of subordinates violating these principles and requirements.
- (vii) If, upon results of an internal investigation, the Employees are found guilty of violation of the requirements of this Policy; they may be subjected to disciplinary action.

### **7.0 RULES FOR HANDLING GIFTS AND HOSPITALITY EXPENSES**

The Bank defines the main objectives of regulation, rules and restrictions in the field of receiving / providing gifts and services in the course of business communication related to the performance of official duties by employees and the Bank's Guidelines, including lists and criteria for permitted and unauthorized gifts, as well as the reasons for their acceptance /donation. Any prohibited gifts shall be declined / returned to the giver at the time of their delivery. The Bank establishes special rules and restrictions with regard to interaction with counterparties as well as with regard to receipt of gifts by Stakeholders of the Bank.





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- (i) Providing / receiving gifts should under no circumstance be a hidden reward nor an attempt to influence the recipient for an illegal purpose, or other actions that may have a negative impact on the reputation of the Board, Management and Staff and/or the Bank as a whole.
- (ii) Gifts are not allowed to family members, relatives or other persons close to employees of the Bank, in connection with the conducting of any actions (omission to act) by such employee related to their functional and official duties in the Bank.
- (iii) While assessing the possibility of obtaining / giving a gift, each employee should be guided by the following principles:
  - (a) No possibility to influence the objectivity of decisions and / or the emergence of obligations from the employee of the Bank, the counterparty, the client, the partner of the Bank in connection with the receipt / provision of the gift;
  - (b) The reasonableness of the cost / value of the gift;
  - (c) Participation in entertainment and social events, accessible to all employees, regardless of their title and position held in the Bank, is allowed.
  - (d) Absence or presence in the prohibited list.

### **8.0 THE PROHIBITED LIST**

Board, Management and Staff must not accept/refuse any gift that:

- (i) Is money or is similar to money (e.g. Gift vouchers) or easily converted into money (e.g. Shares);
- (ii) Is a conflict of interest (real, potential or perceived) – e.g. Is offered by an external source with an interest in a decision that the Board, Management or Staff is likely to make or can influence, including in relation to:



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- (a) Procurement of goods or services;
  - (b) Tender processes;
  - (c) Awarding of a grant or sponsorship;
  - (d) Setting of policy;
  - (e) Enforcement, licensing or regulation; or
  - (f) Contracts.
- (iii) Could create a reasonable perception that it is offered to influence, or could influence, the judgement of the Board, Management or Staff (i.e. How they act, or fail to act, now or in the future);
- (iv) Could in any other way bring their integrity and impartiality, or that of Bank of Industry to disrepute; or
- (v) Is inconsistent with general Banking Code of Ethics.

Board, Management and Staff must not solicit gifts for themselves or anyone else, in any form. To do so may constitute misuse of their position, a breach of this policy and/or a breach of the relevant code of conduct and may result in disciplinary action. It may also constitute corruption and lead to criminal prosecution.

### **8.1 PROVIDING GIFT AND HOSPITALITY**

Gifts, benefits and hospitality may be provided to welcome guests, facilitate the development of business relationships, further BOI's business outcomes and to celebrate achievements. When deciding whether to provide gifts, benefits or hospitality and the type of gift, benefit or hospitality to provide, BOI's Board, Management and Staff will ensure that:



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- (i) any gift, benefit or hospitality is provided for a business reason in that it furthers the conduct of official business or other legitimate organisational goals, or promotes and supports Bank of Industry's objectives and priorities;
- (ii) that any costs are proportionate to the benefits obtained for Bank of Industry, and would be considered reasonable in terms of community expectations; and
- (iii) it does not raise an actual, potential or perceived conflict of interest.

### **9.0 GIVING TO CHARITY**

The Bank has developed a systematic approach to implementation of charitable activities, identification of the participants in the process and the main directions for the implementation of charitable activities.

**9.1** Charity is defined as voluntary activity for the disinterested (gratuitous or preferential) transfer of property to individuals or legal entities, including monetary funds, disinterested performance of work, provision of services, and other support. Charity does not provide for the provision of advertising services.

**9.2** In the process of charity, the following is implemented:

- (i) Control over the cost and expenses estimates for the Bank as a whole;
- (ii) Verification of the authenticity of information provided by legal entities that apply to the Bank for charitable assistance;
- (iii) Legal experts review of statutory documents submitted by legal entities that apply to the Bank for charitable assistance;
- (iv) Transfer of funds allocated in the course of charitable assistance by the Bank to a legal entity.
- (v) The decision to provide charitable assistance to organizations is made by the management of the Bank.



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## **ANTI-BRIBERY AND CORRUPTION POLICY**

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Reviewed by: EMC

Approved by: Board of Directors

Last Review Date: 20/02/2020

- (vi) The Bank should take measures to ensure that the receiver of the assistance is a bona fide Charity Fund or any other Non-profit organization, and that there were no reasons to assume that this fund or any other organization is managed directly or indirectly for deriving benefits in favour of an officer or a person closely related to him or her.

### **10.0 SPONSORSHIP ACTIVITIES**

The sponsor is the person who provided the funds or provided the means to organize and / or conduct a sport(s), cultural or any other event, to create and / or transmit a TV or radio broadcast, or to create and / or use a different result of creative activity in exchange for advertising services rendered to the sponsor.

The expediency of the Bank's participation in the sponsorship project is determined, subject to the analysis of the following parameters:

- (i) Conformity of the project with the Bank's image;
- (ii) Conformity of the project with the strategy of the Bank on sponsorship;
- (iii) Conformity of the cost of the sponsorship package to the advertising opportunities provided therein;
- (iv) Conformity of the target audience of the intended communication media to the target audience of the Bank;
- (v) Experience of cooperation with the organizer;
- (vi) Experience of participation in the previous project;
- (vii) The estimated number of sponsors.
- (viii) Sponsorship is carried out on the basis of a paid service contract - a sponsorship agreement.



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### **11.0 RELIGIOUS AND POLITICAL ACTIVITIES**

- 11.1** The Bank does not participate in the activities of political and religious organizations and does not finance their activities. Employees participating in political, religious or other public activities in their free time should act only as individuals and not Bank representatives.
- 11.2** Agitation for any political party or candidate is prohibited on the Bank's premises, and employees should not promote their religious views or beliefs.
- 11.3** Employees of the Bank shall not be allowed to give gifts, make contributions for political purposes, or organize entertaining events for political parties or candidates to political posts on behalf of the Bank.

### **12.0 CONFLICTS OF INTEREST**

- 12.1** Conflict of interest arises in a situation where the personal interest (direct or indirect) of the employee of the Bank influences or can affect the objective and impartial performance of his/her official duties, which may harm the rights and legitimate interests of the Bank, its subsidiaries, third parties or the Country. A conflict exists whether it is:
- **Real:** It currently exists;
  - **Potential:** It may arise, given the circumstances; or
  - **Perceived:** Members of the public could reasonably form the view that a conflict exists, or could arise, that may improperly influence the person's performance of their duty to the Bank, now or in the future.
- 12.2** In order to avoid, prevent and resolve conflicts of interest, the Bank's employees are required to:



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- (i) Disclose information about a conflict of interest or the likelihood of its occurrence, as soon as it becomes aware of it in accordance with the Bank's Conflict of Interest Policy;
- (ii) Undertake measures to prevent any possibility that gives rise to a conflict of interests;
- (iii) Minimize the risk of conflicts of interest in the performance of their functional duties.

**12.3** Prevention or resolution of a conflict of interests may involve the changing of the range of tasks and specific errands performed under official duties by the employee who is a party to the conflict of interests, and/or his or her rejection of the benefit which has given rise to the conflict of interests (for example, rejecting to cooperate with specific customers or counterparties of the Bank, rejecting to participate in a deal process, etc.). Should no means exist to resolve an existing conflict of interests, the interests of the Bank shall prevail over the interests of the employee of the Bank.

### **13.0 WHISTLEBLOWING**

**13.1** BOI's whistleblower email address, internal and external whistleblowing portal is a secure and confidential information channel designed for employees and other third parties, including clients and counterparties, to provide information about intentions or facts of corrupt practices against the Bank and/or its employees, clients, counterparties, allowing, inter alia, the transfer of information anonymously.

**13.2** An employee shall notify the Compliance Division of the Bank of any information or suspicions of potential corruption actions or omissions to act by other employees, counterparties or other entities interacting with the Bank. If the employee foresees a potential conflicts of interest or for any other reason whatsoever; he/she may, elect to



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address the matter to a higher-level supervisor within the Bank or preferably the Chief Compliance Officer (CCO), the Head of Internal Audit & Investigation, the Legal Adviser, the Managing Director or the Chairman of the Board.

**13.3** The Bank guarantees the observance of the confidentiality principle with respect to Whistleblowing. Verification of the information provided by the Whistleblower will be carried out within the timing established by the Bank's Whistleblowing Policy and the Whistleblower will not be sanctioned (dismissed, demoted, deprived of premiums, etc.) However, should the notification be made with ill intentions as deliberately false, for example, to smear someone or derive any preferences or avoid responsibility; relevant sanctions shall be applied to the Whistleblower according to the Bank's Whistleblowing Policy.

The Bank provides the following information channels for Whistleblowing:

- e-mail: [whistleblower@boi.ng](mailto:whistleblower@boi.ng)
- web-site: <https://www.boi.ng/whistle-blowing-report-form/>

### **14.0 AMENDMENT/REVIEW OF THE ANTI BRIBERY AND CORRUPTION POLICY**

Whenever there is a significant change in the operating environment of the bank, the Anti-Bribery and Corruption policy will be updated to the extent of the change. However, the Anti-Bribery and Corruption policy of the Bank shall be reviewed every three years.



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**ANTI-BRIBERY  
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**ACCEPTANCE AND ACKNOWLEDGEMENT**

I, \_\_\_\_\_ hereby acknowledge the receipt of the Anti-Bribery and Corruption Policy of the Bank of Industry Ltd.

I have read and fully understand the rules and regulations stated in the Policy. In accepting these conditions, rules and regulations, I promise to abide by them accordingly.

I also undertake to return the copy of the Anti-Bribery and Corruption Policy along with other properties of the Bank whenever I cease to be an employee of the Bank.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Email address: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_

Please detach this form, sign and return to the Human Resources Department.