

Absa Group Limited

Third-party Code of Ethics



Your story matters



Contents



Introduction

The Third-party Code of Ethics (“the Code”) has been developed to ensure that Absa Group Limited’s (“our”) values and ethical standards are clearly articulated to and supported by our third-party providers.

The Code determines the ethical values, standards, principles and guidelines that bind our third-party providers in all their dealings with us, and it intends to offer a harmonised approach to responsible sourcing while effectively managing risks and opportunities.

As a leading Pan-African financial services institution, we understand that we need to lead by example in the way that we do business. We seek to reinforce our business integrity by striving to improve the service that we provide and by making responsible decisions in how we manage our business and the social and environmental impacts of what we do to help individuals, communities, businesses and economies progress and grow.

As a founding signatory of the Principles for Responsible Banking under the United Nations (UN) Environment Programme’s Finance Initiative, we believe that only in an inclusive society founded on human dignity, equality and the sustainable use of natural resources can our clients, customers and businesses thrive. This is why we have committed to using our products, services and relationships, including those with our third-party providers, to support and accelerate the fundamental changes needed in our economies to achieve shared prosperity for both current and future generations.

We comply with applicable laws and regulatory requirements in the various jurisdictions in which we operate and require our third-party providers to do the same. In instances where the standards outlined in this document differ from local laws and customs, third-party providers are to adhere to the higher level of compliance.

We seek mutually beneficial relationships with third-party providers based on merit. We provide competitive bidding opportunities to a diverse base of qualifying third-party providers, ensuring fair and equal treatment during selection as guided by our Third-party Policy and its supporting standards. We also require third-party providers to conduct themselves in a way that avoids conflict of interest, while promoting fair competition and avoiding anti-competitive practices. We honour commitments made to third-party providers by complying with the terms of our contracts.

The Code itself is the first step in the development of a constructive engagement between third-party providers and us. The provisions outlined in the Code will be periodically updated to reflect changes in laws, regulations, policies and standards.



1. Environmental management

In fulfilling our environmental responsibilities, we comply with applicable environmental legislation as well as the standards and operating procedures in the countries in which we operate. We integrate environmental considerations and implications into our business decisions and lending evaluations by using risk-based criteria embedded in our internal policies and processes. We collaborate to improve environmental performance and use sustainable practices in property design and management.



We require our third-party providers to join us in similar environmental efforts, including:

Environmental management

Implementing environmental management policies/systems as appropriate in their businesses to support compliance with local government regulations and to strive towards best practices.

Environmental impact management

Aligning with best-practice activities, including the setting of environmental targets, reducing operational environmental impacts and disclosing information to demonstrate environmental performance.

2. Human rights

In line with our purpose of empowering Africa's tomorrow, together ... one story at a time, and with our aspiration to be a financial services group that is globally respected and of which Africa can be proud, we are committed to respecting and upholding human rights in all our operations.

We seek to operate in accordance with the Universal Declaration of Human Rights and the associated International Bill of Human Rights, and take account of other internationally accepted human rights standards, including the UN Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises, the Convention on the Elimination of all Forms of Discrimination Against Women and the International Labour Organisation Core Conventions and Treaties.

Our commitment to upholding these rights is firmly entrenched in our Absa Way Code of Ethics Policy and Reputational Risk Policy. It is also demonstrated in our lending practices, as documented in our Environmental and Social Risk Standard for Lending, Group Sustainability and Citizenship policies, and human resources policies and standards.

We support human rights through our value chain by insisting on behaviours and practices that align with our own standards and policies, with specific consideration for health and safety, freely chosen employment, avoidance of child labour, reasonable working hours, fair wages and benefits, freedom of association, and diversity and inclusion.

This is enabled by rigorous due diligence before entering into relationships with key third-party providers, to avoid adverse human rights impact.



“We support human
rights through our
value chain”

2. Human rights *continued*

We welcome relationships with our third-party providers as opportunities to improve and evolve practices with respect to human rights. These behaviours and practices specifically consider the following:

Occupational health and safety

Providing a safe and hygienic work environment through proactive management and controls that minimise health and safety risks and support accident prevention for all personnel, based on knowledge of the industry and related legislation. Our contractor management guidelines support these efforts by guiding activities when products and services are delivered on our premises.

Freely chosen employment

Ensuring that all work is completed voluntarily and without slavery, servitude, forced or compulsory labour and human trafficking.

Avoidance of child labour

Children must not be employed. All labour practices must comply with the minimum age for work and prioritise the mandatory schooling age.

Working hours

Ensuring that all workers are entitled to work and are paid for a minimum level of working hours as governed by the respective employee contracts, that working hours are not excessive and that maximum working hours comply with national laws.

Wages and benefits

Being responsible for employee compensation and paying

fair wages. All employees are to be paid a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher. Any overtime should be voluntary and compensated appropriately.

Employee freedom of association

Respecting the rights of workers to exercise freedom of association and collective bargaining. Where the right to freedom of association and collective bargaining is restricted under law, third-party providers will not hinder the development of alternative means to inform/consult with employees.

Avoidance of discrimination and harassment

Promoting a workplace free from discrimination, harassment (sexual, physical, mental or emotional), victimisation or any other form of inappropriate behaviour or abuse on any grounds, including but not limited to age, disability, ethnic origin, gender, gender identity, nationality, marital status, parental status, physical appearance, political convictions, pregnancy, race, religious beliefs, sexual orientation, social origin or status, economic status, union affiliation or employment status.

Grievances

Implementing formal mechanisms that allow employee grievances regarding human and labour rights violations to be properly filed, addressed and resolved without fear of perceived or actual retaliation.

The Absa Human Rights statement can be found at https://www.absa.africa/wp-content/uploads/2022/09/Absa_Human_Right_Statement.pdf



3. Diversity and inclusion



We use fair and objective employment practices to ensure that all employees are recruited, employed and upskilled based on merit, qualifications, skills and competency to do the job, and not on personal bias or prejudice. We achieve this by dealing fairly and ethically and we do not tolerate any form of discrimination, bullying or harassment in the workplace.

Inclusion forms an integral part of our overall strategy. It is led by Absa executive members and championed by a group of senior leaders from across our businesses and geographic locations.

We are dedicated to creating an inclusive environment where everyone's perspective is valued. We achieve this by cultivating a working environment in which the unique talents of each employee are fully utilised and respected.

These achievements are supported through a series of internal policies, programmes and colleague support networks, and are underpinned by our five key pillars that form the structural foundation for progress, namely:

- **Gender;**
- **Multi-generationalism;**
- **Disability;**
- **Multiculturalism; and**
- **LGBTQ+ inclusivity.**

We take action if we observe inappropriate or unacceptable behaviour. Our third-party providers must align with us to achieve excellence in equality, diversity and inclusion through, among other things:

Workplace inclusion and development

Actively demonstrating commitment by documenting an approach to equality, diversity and inclusion through all aspects of workplace operations and management.

Inclusive supply chain management

Our inclusive procurement practices and supply chain development programmes provide entrepreneurs with access to business opportunities, to address the challenges that they may experience.

Our third-party providers must, as appropriate, drive active management of downstream supply chains as part of their commitment so that the principles of diversity and inclusion are encouraged. As part of this active management, our third-party providers must utilise and develop diverse businesses such as ownership-diverse or emerging small and medium enterprises.

4. Society

We recognise the impact that our procurement practices may have on local society. Our third-party providers must avoid decisions that may have a negative social or economic impact on society. They are also encouraged to establish initiatives designed to foster local development and prompt payment.



5. Product and service responsibilities

We are committed to delivering products and services that are responsibly sourced, produced and delivered to our customers, clients and employees. Our value chain partners must be aligned to support this commitment through:

Customer-focused accessibility and inclusion

Embedding relevant standards, innovation and best practice to deliver inclusive products and services for our customers and stakeholders. Encouraging third-party providers to demonstrate commitment and the ability to support our aim to deliver products and services that meet the needs of our diverse customers and stakeholders, including the needs of people with disabilities.

Legal and safety compliance

Ensuring that products and services are designed, produced and distributed in such a manner as to comply with laws, regulations and voluntary codes throughout their life cycle. All products supplied to us must meet the minimum standards of the jurisdiction in which they will be supplied, along with relevant safety information, where applicable.

Avoidance of disputed products and services

Demonstrating avoidance of the sale, use, marketing and communication (including the advertising, promotion and sponsorship) of disputed products or services, as defined by regulations and voluntary codes.

Fair dealing with customers

Designing and controlling sales and performance incentives in such a manner as to comply with regulations, voluntary codes and our incentive principles and standards, as well as to provide transparency and offer safeguards to prevent moral hazard and conduct risk that could negatively affect customers.



6. Extending our values and behaviours



We are a truly African brand, inspired by the people we serve. Our purpose is to empower Africa's tomorrow, together ... one story at a time. The Absa Way Code of Ethics Policy outlines our values and expected behaviours when engaging with our fellow employees, customers, clients, shareholders, governments, regulators, business partners, third parties, competitors and the broader community.

What does our purpose of empowering Africa's tomorrow, together ... one story at a time mean?

We are committed to being a truly purpose led organisation, one that makes a meaningful, positive contribution to the world around us and places our purpose at the heart of everything we do. Our purpose statement reflects the following core principles:

- **Empowering:** As a financial institution we are dedicated to empowering and enabling those we serve. This includes investing in our colleagues, uplifting our communities and enabling our clients' ambitions. Empowerment is an active, ongoing commitment, one that shapes every moment of our partnership journey. Through imagination, energy, passion and innovative thinking, we unlock new possibilities. Our focus on empowerment ensures that we continue to invest in people and their capabilities, to help them thrive.
- **Africa:** Africa is our heartbeat. We take pride in our Pan African presence and are deeply committed to contributing to the continent we call home. With more than a century of heritage on African soil, we care for, invest in and protect this home that inspires our sense of belonging and warmth. Africa is not just where we operate; it is a core part of who we are.

- **Tomorrow:** While we honour our rich heritage, we also embrace the responsibility of shaping a better tomorrow for our colleagues, clients and communities. We recognise that every action today influences the future we collectively build. With resilience and a long term mindset, through both good times and challenging ones, we deliver on our commitments. We see ourselves as stewards of a more sustainable world, who act with the awareness that tomorrow holds the hopes of future generations spanning from the next day to decades ahead.
- **Together:** We strive to be a trusted, caring partner to all our stakeholders. We value diversity and inclusivity, recognising that they strengthen us and unlock the full potential of every individual. Collaboration lies at our core. We hold ourselves and one another accountable, knowing that our collective efforts create better outcomes. By listening to diverse perspectives and making informed choices, we bring our strategic ambitions to life. We are, and always will be, stronger together.
- **One story at a time:** We believe that every story matters. Like building a masterpiece brick by brick, we progress through meaningful human connections, no matter how big or small. Storytelling is woven into our African heritage and it binds us. We see you, we hear you and your story inspires us to act with purpose and remain grounded in what truly matters. This philosophy is reinforced through our brand and business positioning: **"Your story matters"**.

If our purpose is our north star, our values are the guiding light that defines how we operate. They guide how we collaborate, the respect we show one another and the shared purpose that unites us.

6. Extending our values and behaviours *continued*

Our values are:

- **Trust:** We believe in ourselves and one another.
- **Resourceful:** We innovate for our colleagues, clients and communities.
- **Stewardship:** We take actions today that sustain our tomorrow.
- **Inclusion:** We are stronger together.
- **Courage:** We show up as our authentic selves to own our story.

How we behave is instrumental to achieving the highest standards of performance, adding value for our customers and clients, and meeting our regulatory obligations. Over and above the behaviours that bring our values to life, we have a set of behaviours that guide the Absa Way Code of Ethics Policy.

We expect our employees to:

- Act ethically and with integrity;
- Act with due skill, care and diligence;
- Be open and cooperative with regulators;
- Treat customers fairly;
- Observe standards of market conduct;
- Respect one another professionally, including our diversity; and
- Remember our communities in day-to-day business.

Our third-party providers are expected to collaborate with us in achieving these goals by ensuring that all their employees, contractors and subcontractors who interact with our personnel, clients and customers on our behalf demonstrate these values and behaviours. Where appropriate, third-party providers are to communicate the information contained in the Absa Way Code of Ethics Policy to their employees to help them reflect and demonstrate the Absa Values in their interactions with our employees, clients and customers.

Third-party personnel should be aware of rules and restrictions that regulate interaction with our employees and must not cause non-compliance with laws and policies, specifically:

Anti-bribery and anti-corruption

We are committed to conducting our activities without any form of bribery or corruption. We adopt a zero-tolerance approach to any acts of bribery or corruption perpetrated by our employees, third-party providers and others with whom we do business or who act on our behalf.

Any suspicions of or attempts at bribery, corruption, or suspected or actual breaches of the Absa Anti-bribery and Anti-corruption Policy, must be reported. The whistleblowing and contact detail sections in this document explain the relevant process.

Competition/Anti-trust law

We are committed to complying with competition/anti-trust laws in all the jurisdictions in which we operate, as set out in our Competition Law Policy.

Gifts and entertainment

We do not offer, accept or solicit gifts or entertainment inappropriately as an incentive or means of influencing actions or opinions that amount to or create the impression of bribery. If a third party wants to offer an Absa employee a gift or entertainment, the employee will be guided our Gifts and Entertainment Standard, which outlines what is and is not acceptable.

Conflicts of interest

In line with regulations and ethical responsibility, we have policies and controls that manage conflicts of interest and takes appropriate measures to properly identify and manage potential conflicts. Absa employees are required to seek approval for outside business affiliations, including those with third parties. Our third-party providers are obligated to support our conduct risk initiatives and notify us of any known or perceived conflicts of interest.

Fraud

We have zero tolerance for fraud and other dishonest actions. As our defences become more robust, fraudsters are increasingly targeting customers, third-party providers and employees directly. Our third-party providers must support our organisation's efforts to combat fraud by being vigilant, maintaining processes and procedures that have built-in fraud controls and taking proactive steps to report incidents.

7. Raising concerns (whistleblowing)

We expect everyone to speak up if they believe that something is not right – such as misconduct, fraud or illegal activity – or if they feel that our standards are not being met. All stakeholders should act in good faith by only reporting information that they reasonably believe to be true.

We prohibit malicious and false reporting.

Concerns raised are taken seriously, treated sensitively and, where appropriate, investigated independently. No person will be treated less favourably or discriminated or retaliated against because they have raised a concern.

We expect our third-party providers to make their employees aware of how to blow the whistle and strongly encourage their employees to raise concerns regarding or to blow the whistle on inappropriate conduct by us or our employees. Third-party providers must inform their employees that they will not be subjected to retaliation by their employer, us or our employees as a result of raising a concern and that if they are retaliated against, this should be reported to us.

Third-party providers are required to adopt appropriate internal procedures if they do not already have a process that assists workers (employees and subcontractors) with concerns to blow the whistle internally on relevant matters.

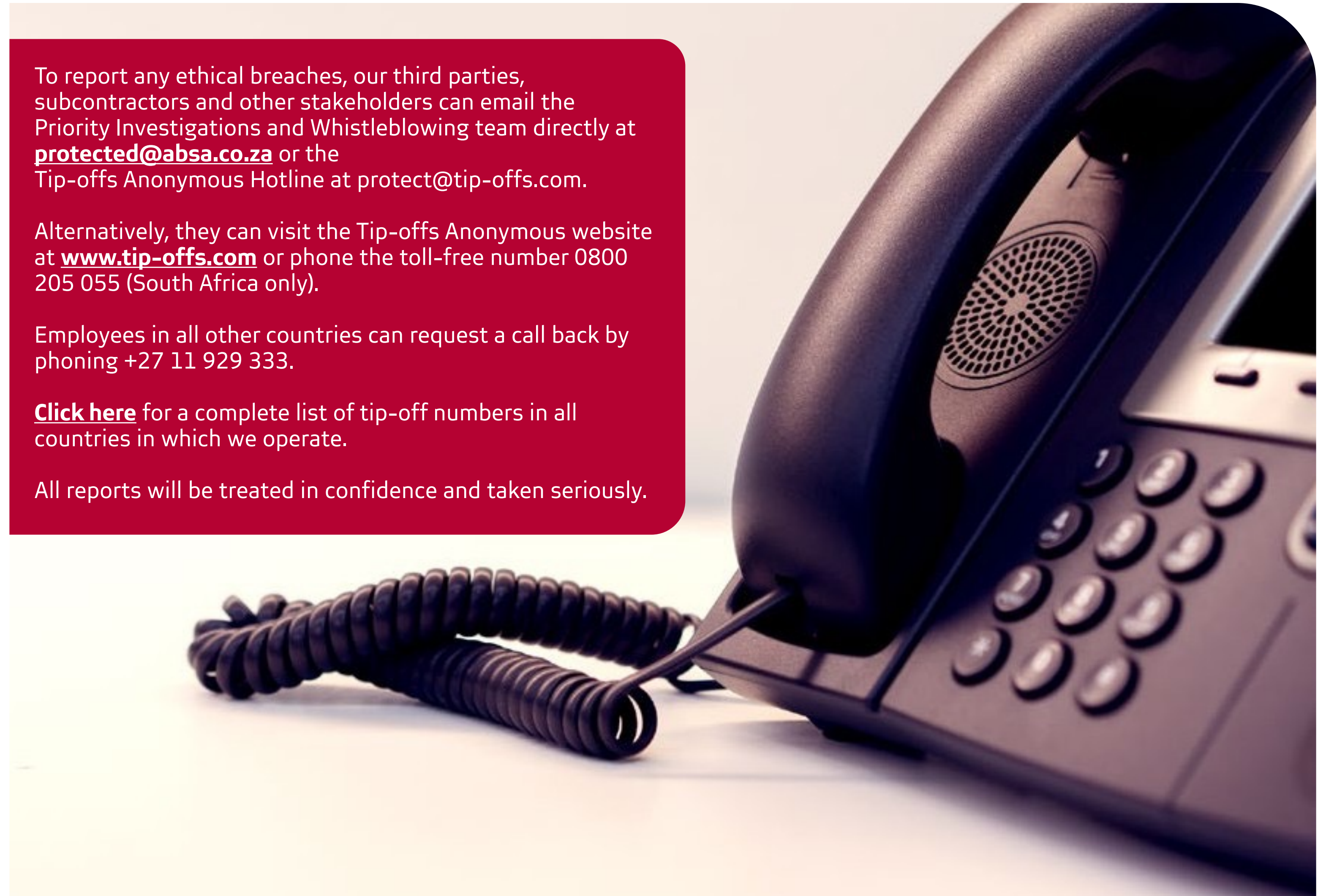
To report any ethical breaches, our third parties, subcontractors and other stakeholders can email the Priority Investigations and Whistleblowing team directly at protected@absa.co.za or the Tip-offs Anonymous Hotline at protect@tip-offs.com.

Alternatively, they can visit the Tip-offs Anonymous website at www.tip-offs.com or phone the toll-free number 0800 205 055 (South Africa only).

Employees in all other countries can request a call back by phoning +27 11 929 333.

Click here for a complete list of tip-off numbers in all countries in which we operate.

All reports will be treated in confidence and taken seriously.



8. Monitoring and due diligence



We have a responsibility to conduct appropriate due diligence before entering into relationships with third parties.

This includes, but is not limited to, reviewing copies of employment and health and safety policies, and undertaking due diligence with the aim to establish that none of our third-party providers have any association with activities linked to adverse media, human rights, financial crime, environmental breaches or other unethical practices.

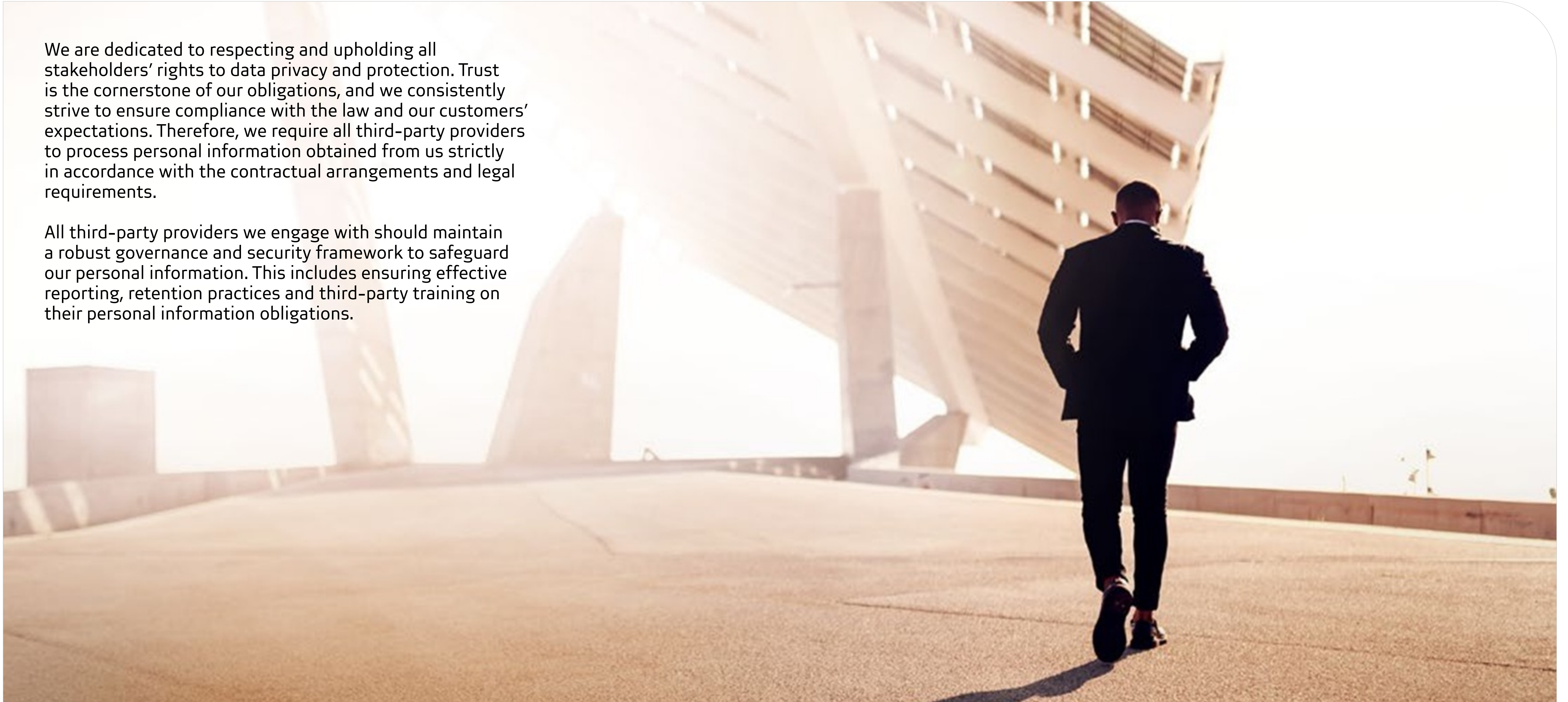
All third-party providers are required to self-monitor their compliance with our Third-party Code of Ethics and to inform us of any non-compliance. We further require that third-party providers conduct a periodic self-certification against our Third-party Code of Ethics and be able to provide evidence of self-monitoring or self-certification on request.

Key third-party providers will be subject to on-site audits from time to time. Any third-party providers not meeting our requirements, through either self-certification or onsite review, will be subject to measures that may include a remediation process. Where no suitable resolution is reached, the termination of services or the relationship is likely.

9. Confidentiality and privacy

We are dedicated to respecting and upholding all stakeholders' rights to data privacy and protection. Trust is the cornerstone of our obligations, and we consistently strive to ensure compliance with the law and our customers' expectations. Therefore, we require all third-party providers to process personal information obtained from us strictly in accordance with the contractual arrangements and legal requirements.

All third-party providers we engage with should maintain a robust governance and security framework to safeguard our personal information. This includes ensuring effective reporting, retention practices and third-party training on their personal information obligations.



10. Definitions

Third-party provider means any juristic or natural person who provides a product, provides a service and/or performs activities on our behalf or to any of our clients, either directly or indirectly.

Sustainability risk results from the failure to implement responsible operational, procurement and lending practices, that has a direct and indirect negative impact on the environment and society and/or geographies in which we operate and may reduce value over the long term.

The Absa Way means the purpose and values that govern our way of working across our business. It drives the way in which we think, work and act at Absa to ensure that we empower Africa's tomorrow, together ... one story at a time. It guides our working relationships, specifically between employees, customers and clients, governments, regulators, business partners, third parties, competitors and the broader community.

Ownership diverse refers to businesses that are owned and operated by disadvantaged members of the population, which could be women, minorities, people with disabilities and black economic empowerment or other businesses deemed disadvantaged due to their size or location, or due to being socially or economically disadvantaged.



Thank
you