

## **Sustainability Statement**

#### 1. SCOPE

This Sustainability Statement reports our Environmental, Social and Governance initiatives for financial year ending 31st March 2022 (FY 2022).

#### 2. OUR APPROACH TO SUSTAINABILITY

Our purpose is to lead towards a better and more sustainable Myanmar. We aim to contribute to the financial and social empowerment, as well as the well-being of our stakeholders. In the longer term, we believe our contributions will be an agent for change to greater national socio-economic development. We have based our FY2O22 Sustainability Statement on materiality assessments and stakeholder engagements conducted during the year. The Bank continues to align its business objectives with its sustainability targets.

#### 3. IDENTIFYING MATERIAL ISSUES

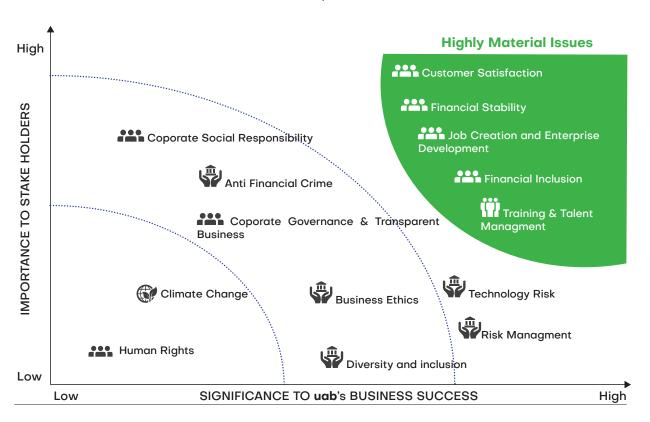
The materiality assessment was reviewed in March 2022 and the sustainability matters

which are shown on the materiality map below were found to be most relevant to the Bank and our stakeholders

The significant stakeholders with whom we engage with are:

- · Customers
- · Shareholders
- · Employees
- · Business Partners & Suppliers
- · Regulators
- · Community

There were no significant changes noted from previous year except, that all stakeholders had a strong emphasis on financial stability as a critical component given the recent COVID-19 and political crisis over Myanmar and its effect on the business environment. In the Bank's latest Annual Report, we address the steps taken towards continuing to build on our strong financial strength and foundation.





A deeper discussion of our material assessment can be found in our website at: https://www.uab.com.mm/strategy/materiality-assessment/
Similarly, how we engage with our stakeholders may be found in: https://www.uab.com.mm/strategy/stakeholder-engagement/

#### 4. ALIGNING OUR BUSINESS AND SUSTAINABLE GOALS

The United Nations Sustainability Goals (SDGs) are made up of seventeen (17) goals and having determined the highly material issues at the Bank, we have decided to focus our business targets towards four (4) of the SDGs. Below, we have stated specific targets towards the SDGs.

Sustainability Development Goals	8 DECENT WORK AND ECONOMIC GROWTH	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	4 QUALITY EDUCATION	3 GOOD HEALTH AND WELL-BEING
Material issues identified	·Financial inclusion ·Financial stability	·Job creation and Enterprise development	·Training & Talent Management	·Customer satisfaction
Specific targets	·Enabling home ownership ·Providing digital solutions ·Financial literary ·Continued good financial performance of Bank	·Financing SMEs ·Developing products for cash flow management	Regular training to employees Scholarship and bursary support for children of employees	·Appropriate and suitable products ·Transparency ·ESG Policy ·Developing bancassurance

Further, having identified specific targets, the progress and impact of our targets are as below. It must be noted that we had first launched this journey towards sustainability measurements in 2019 and the time horizon towards achieving and developing the targets is 2024.



	1	T	
Item	Target	Time target	Achievements as at Financial Year ending 31st March 2022
Home ownership (SDG 8)	10.5% of total loan portfolio	30 September 2024	As of 31st March 2022, the home finance portfolio made up 2.74% of the total loan portfolio
Digital solutions (SDG 8)	Enabling customers to operate an account through handheld devices	App to be developed by 30 September 2020 with yearly incremental improvements.	uab bank's digital app (uabpay) was successfully launched in 2020 and it is being developed into a Super app, enabling Customers to conduct their business without being at the Bank branch.  The following features have been developed:  opening a digital wallet payments to merchants through QR
			code     access to all bank accounts     access to all credit and prepaid cards     wallet-to-wallet and account-to-account transfers     Interbank transfers     Bill payments     Mobile top-ups
			Inter-wallet operability is an on-going process and fund transfers may be made to Citizens Pay, MPT Pay and Mandalay Smart Pay.
			International Money transfers may be received from RIA Money Transfers.
			Cash withdrawal through agents (other than bank branches) through uabpay+ is being developed as the next phase.
Financial literacy (SDG 8)	Conduct at least 12 financial literacy sessions or projects per annum to unbanked, underbanked, and underserved individuals	30 September 2024	Despite the COVID -19 and unstable political situation during the financial year, financial literacy outreach was conducted to educate people on inward remittances particularly with Western Union and RIA money transfers. This was successfully undertaken in 7 villages in the Tatkon/Naypitaw area, 2 villages in in Kyaukpadaung area and 1 village in the Pokkoku area.  At each village, between 25 to 40
			villagers attended the sessions and about 300 people were reached though the program.



Financing SME (SDG 9)	26% of total loan portfolio	30 September 2024	As of 31st March 2022. SME financing made up 9.35% of the loan portfolio.  22.56% of SME financing were made through JICA 2-step loan program which provided preferential interest rates to reduce the cost of borrowing to these SMEs.
Developing products for cash flow management (SDG 9)	Developing a Supplier Chain Financing solution	30 September 2024	Supplier Chain Financing product has been launched enabling customers to discount their invoices whilst waiting to receive payments from buyers.  A Cash Management solution is presently being developed.
Training employees and development of talent (SDG 4)	A minimum of 30,000 man-hours of training to be provided each year.	30 September 2024	For FY ending 31st March 2022, a total of 35,800 man-hours.  In addition, during the short financial year, 17 students received work exposure as interns.
ESG Policy (SDG 3)	To formulate and thereafter implement an ESG policy	Formulation by March 2023. Full implementation by March 2024	Policy is presently on a work-in- progress basis.
Transparency (SDG 3)	Issue GRI Index and SASB Index	Publication of index and to be completed by May 2020 and yearly reviews to be conducted.	The GRI and SASB Index has been successfully published by the Bank.  The Bank's Annual Reports and Sustainability Reports are now publicly available in the Bank's website. The Bank also has voluntarily subscribed for Pwint Thit Sa (Transparency in Myanmar Enterprises) reviews conducted by the Myanmar Center for Responsible Business to ensure transparency.
Bancassurance (SDG 3)	Launch bancassurance by financial year 2021	1 <sup>st</sup> phase to be launched by May 2021	uab bank has partnered with Manulife to offer life insurance protection through the Bank's bancassurance product. This is with effect from January 2021.  As a 2nd phase, the Bank is finalising the negotiation with a General Insurance provider to offer general insurance products through a bancassurance scheme.

## **Sustainability Statement**

#### 5. NON- FINANCIAL KPIS

In its sustainability objective the Bank adopts a number of non-financial KPIs and a summarised discussion of the relevant non-financial KPIs is as below:

Topic and Social Issues	Financial year ending 31st March 2022 (FY 2022)	Impact
Equal Opportunity Employment (gender, age)	Total employees: 1,756  · Male: 835  · Female: 921  By age  · 18-30 years: 746  · 31-40 years: 698  · 41-50 years: 235  · above 51 years: 77  Promotions awarded for FY 2022 totalled 192 staff out of which:  · Male: 74  · Female: 118  Staff with job grades of Vice  President and above:  · Male: 11  · Female: 14	The Bank ensures that there is equal opportunity in gender, age and promotional opportunities.  Over FY 2022, there was generally, a satisfactory balance in the provision of equal opportunity.  A separate Human Capital Report is available in the Annual Report 2022
Employee engagement	An Employee Satisfaction survey published on 14th August 2020 produced the following results:  1. Number of respondents: 1,155 (82.5% of white-collar work force)  2. Score: 5.7 on a 7-point Likert Scale (81.4%)  The good score resulted in the Bank being listed under "Best Companies to work in Myanmar 2020 – Employee's Choice" https://www.jobnet.com.mm/bcim	Employee satisfaction indicated by the good score further appeared to have a positive impact on the Bank's financial performance with <b>Net Profit per Employee</b> in FY 2022, improving to <b>MMK 11.6 million per</b> employee (annualised) compared to MMK 5.2 million in the previous year.  A fresh employee satisfaction survey is due to be published in September 2022.
Employee Turnover rate (%)	Employee turnover amongst operating staff was <b>15.8%</b>	Employee turnover was slightly over the targeted maximum of <b>15%</b> .
Absenteeism rate (%)	Absenteeism Rate (%): 0.29% (Absenteeism is the unexcused leave measured against the working days in the period)	The absenteeism rate of <b>0.29%</b> for FY2022 which was a slight increase compared to 0.23% in the previous year, indicating a continued satisfactory employee engagement.
Disability (number)	1 person	The Bank has policies on non-discrimination and equal employment opportunity for disabled persons. uab is committed to hiring any capable individual regardless of their disabilities.



Fatality Rate (%)	O % fatality rate	The fatality rate for FY 2022 was Nil with no deaths reported and within the Bank's target of zero fatalities.  Given that the Bank is in the Service industry and not in an industrial or manufacturing environment, the accident and fatality rates are expected to be low.
Frequency rate for accidents (number)	Six (6) car accidents involving uab drivers. The accidents were reported to be minor.  There were no fatal injuries during FY2022.	The Lost Time Injury Frequency Rate (LTIFR) due to accidents FY 2022 was 3.71 (where lost time due to accidents is measured per one million hours worked).  This is compared to 2.27 in the previous years. Both the numbers are low due the nature of the jobs in the banking industry.
Training (number)	Total man hours of training provided: <b>35,800</b> hours Number of staff who attended training sessions: <b>1,750</b>	Despite the FY 2022 having 6 months only, the training hours increased to 35,800-man hours compared to 22,200 hours the previous year.
Career Development/ Appraisal (number)	Over the 6 months period, one (1) performance appraisal was conducted in October 2022. All confirmed employees of the Bank were appraised.  As part of career development and succession, 192 employees were promoted based on their performance over FY 2022.	This is the 6 <sup>th</sup> year in running of conducting these sessions and the Bank has been consistent with conducting appraisal and career development sessions.
Health & Safety	The Health & Safety Policy was reviewed and made available in our website: (https://www.uab.com.mm/governance/governing-policies/)  Annually, the Administration Dept of the Bank conducts a survey on the physical maintenance at branches. From the survey, recommendations are made to the Management on physical improvements. The surveys for Financial Year 2022 had been completed.	The frequency and fatality rates for FY 2022 have been provided in the report above and they remain acceptable with no fatal injuries.  Over FY2022, the COVID-19 pandemic continued to have some impact with the Omicron variant albeit, a much smaller impact on health and safety compared the prior 2 years. The Bank ensured the following on the Myanmar Ministry of Health directives and the guidelines of WHO over the period.

#### **Health & Safety**

At uab Tower @ Times City, a
HSE inhouse audit and health
check by the Facility Management
Team together with the Bank's
Internal Auditors was conducted
over March 2022 as an effort
to monitor our existing HSE
guidelines and to continually
improve our awareness and
management of our key risks.

Several health benefits are made available to employees including:

- Welfare grant of MMK 100,000 for major surgery
- Paid leave of up to 6 months for prolonged illness
- · 30 days of paid medical leave
- · Work Life Balance

Further, as a part of our initiative to support work life balance, we offer flexible working hours, sabbatical leaves, extended maternity leaves et al The steps taken for COVID-19 precautions and safety included work-from-home, facial mask, cleaning of hands, social distancing, quarantine and vaccination.

Apart from safety precautions stated above, the Bank provided aid to both employees and the community throughout the pandemic period. The Bank sponsored a total of 606 employees and their family members with vaccinations FY2022.

Within our non-financial KPIs, the environmental impact were as below:

#### **Environmental issues**

#### Waste

One of the largest source of waste in the Bank is paper and to discourage the use of paper, the Bank has undertaken a digital exercise with the following policy development:

- $\cdot\,$  Cloud based storage vs the conventional way of paper storage
- · All communications between staff are now done via email.
- Electronic submission of credit proposals, expenditure approvals, leave request and formation of digital registers
- · Central printing and e-fax
- Re-engineering to reduce paper applications and forms at branch counters
- · Printing paper expenditure
- FY ending 30th Sept 2020 = MMK 41,733,825
- FY ending 30th Sept 2021 = MMK 23,013,837
- FY ending 31st Mar 2022 = MMK 7,117,869 (6 months)

As at 28th Feb 2022, two major projects namely a Loan Origination System and Human Resource Management System had been launched and this is expected to further reduce the use of paper for loan and HR processes. These projects are expected to be completed by 30th Dec 2022.



### · Electricity expenditure Energy FY ending 30<sup>th</sup> Sept 2019 = MMK 258,858,101 · FY ending 30th Sept 2020 = MMK 343,629,518 • FY ending 30<sup>th</sup> Sept 2021 = MMK 290,597,476 • FY ending 31st Mar 2022 = MMK 144,033,359 (6 months) · New increased charges of electricity energy per unit starting from 1st July 2019 by the Ministry of Electricity and Energy saw the increase in cost of electricity · At uab Tower where our Head Office staff are centralised, Implemented Central air-conditioning system to reduce electrical consumption · Encouraged good practice of switching off utilities when not in use Petrol expenditure • FY ending 30th Sept 2019 = MMK 320,747,063 • FY ending 30th Sept 2020 = MMK 183,769,514 • FY ending 30th Sept 2021 = MMK 193,804,048 • FY ending 31st Mar 2022 = MMK 257,688,493 ( 6 months) · Adopted a policy of replacing older vehicles with more energy efficient and environmentally friendly vehicles Together with the above a more vigorous control of use of company cars was implemented. COVI9-19 had some impact with reduction of physical visits and use of internet and phone contact for FY 2020 and 2021. Significant petrol price increases were seen in FY 2022 Carbon • Carbon: Estimated to have been produced from our electricity and petrol consumption • FY ending 30th Sept 2020 = 1,880 metric tons • FY ending 30th Sept 2021 = 1,266 metric tons • FY ending 31st Mar 2022 = 754 metric tons (6 months) · The consumption reduced in FY 2021 due to higher work-from-home schedules by employees as a result of the COVID-19 pandemic and political situation Water Water: FY ending 30<sup>th</sup> Sept 2019 = MMK 3,294,350 FY ending 30<sup>th</sup> Sept 2020 = MMK 4,233,561 FY ending 30<sup>th</sup> Sept 2021 = MMK 1,994,207 • FY ending 31st Mar 2022 = MMK 1,621,050 (6 Months) Controls are being implemented to moderate usage of water. With drinking water, we have reduced the use of smaller plastic

bottles.

water bottles with water dispensers using larger reusable plastic

renovated branches, eco-friendly toilet flushes have been installed.

At the new Head Office, uab Tower @Times City and newly

## **Sustainability Statement**

#### **6. SOCIETAL RESPONSIBILITIES**

A number of societal responsibilities have been acted upon and they include

#### **6.1 Product Responsibility:**

uab bank has formulated and implemented a Product Responsibility Statement. Based on the statement, we adhere to following principles while designing and launching of the product:

- · Product must relate to economy
- · Product must be easy to understand
- · Product must create benefits

Oversight of all product development and performance is by the Management Product Committee.

A variety of products are offered by the Bank and they include deposits, loans, remittances, payment apps, cards and bancassurance. These products are described in our website.

The latest Product Responsibility Statement can be found at:

https://www.uab.com.mm/governance/governing-policies/

#### **6.2 Supply Chain Management**

We adopted the Vendor Code of Conduct, which requires vendors to abide by human rights laws, environmental laws, bribery and corruption laws et al.

The Vendor Code of Conduct sets out our expectation of Vendors towards achieving sustainability.

The Management is also looking at steps of shortening the supply chain via building a direct relationship with producers to enable the producers to obtain profits whilst we control our cost The latest Vendor Code of Conduct can be found at:

https://www.uab.com.mm/governance/governing-policies/

Vendors are expected to comply the Bank's Code of Ethics, which is also available on this website

#### **6.3 Philanthropic Activities**

Over period 1<sup>st</sup> Oct 2020 to 31<sup>st</sup> March 2022, the Bank has contributed a sum of MMK 216,094,070 towards the following:

- Setting up an Oxygen Plant MMK 150,001,700
- Sponsor of Sinopharm vaccine
   MMK 28,300,000
- Purchasing O2 Concentrators
   MMK 17,793,500
- Supplying COVID-19 medicines
   MMK 7,000,000
- COVID-19 Support MMK 13,498,870

Much of the effort over the last 3 financial years has been towards fighting the COVID-19 pandemic and the above was on top of the contributions of **MMK 170,336,740** made in the previous year.

An up-dated **Statement on Donations and Charitable Contributions** can be found at:
https://www.uab.com.mm/governance/
governing-policies

### 7.NON-FINANCIAL ACTIVITY

#### 7.1 Customer health and safety

Due to the nature of the banking activity conducted, products offered to customers generally have a low negative impact on customers' health and safety.

For FY 2022, there were no reports or complaints of injury to Customers.



For the safety of Customers, security guards at the Bank's premises are regularly reminded of maintaining security. Security cameras are also checked.

COVID-19 precautions continued over FY 2022 and the requirements for face mask, hand sanitizing and social distancing were observed at our branches.

Where an incident occurs, incident reporting is made though the Bank's Operational Incident Reporting mechanism and actions taken in a timely manner and the mechanism is explained in Item 7.8 below.

7.2 Supplier/ Contractor selection and criteria uab bank's Vendor Code of Conduct describes the uab banks' expectations of how its vendors conduct the business. All the vendors (including subcontractors) who provide products and/or services are expected to act in accordance with the Code. uab bank assesses the prospective Vendors against their compliance with our Codes before they are selected to provision services/products to the Bank, uab bank has circulated the Vendor

The Bank's "Basic Procurement Guidelines" sets the procedures for vendor selection when a purchase order is required to be issued and it provides the Bank's Management the assurance that due care has been taken for each order made.

Code of Conduct to all the vendors.

Due to the nature of the activity conducted, a major portion of the Bank's sourcing cost is directed towards stationery. We lay emphasis on sourcing locally and encourage small and medium enterprises. Out of 150 vendors (as of 31st March 2022), who are currently associated with us, 90 % of them are small

or medium enterprises. Further, **Anti-Bribery** and Corruption Policy, Gift Guidelines have been formulated and rigorously implemented to ensure transparency during the vendor selection process.

Incidents of non-compliance to Codes and Policies involving vendors and suppliers are reported via the **Operational Incident Reporting mechanism** (see Item 7.8).

### 7.3 Environmentally- friendly value chain At sourcing level

uab bank relies on a number of vendors to deliver the end services. The services provisioned by vendors may not be visible at the end user level however, services are essential for us in order to ensure we continue to give world class service to our customers. We understand relying on third parties exposes us to certain risks, that might be contrary to our views and beliefs. Thus, to ensure, values and beliefs of the vendors are aligned with our values and belief, uab bank has adopted Vendor Code of Conduct. Vendor Code of Conduct requires vendors to have policies and mitigating measures for negative environmental impacts from their operations, products and services. Vendors are also subject to the Bank's Code of Conduct.

#### At the bank level

uab bank is committed to reduce the use of energy, carbon emissions, waters discharge et al. Reducing paper consumption is a major project and the bank is moving towards optimizing its digital platform to this end.

Our energy, carbon emission and water discharge numbers have been reported in the Non-financial KPIs above.

## **Sustainability Statement**

#### At customer level

Since the Bank is primarily involved in lending activity, we are aware in certain situations customers activities have negative impacts on the environment. For our lending and financing activities, we have established an **EXCLUSION LIST**, which list down sectors that do not fit our beliefs and values and our commitment towards sustainability. The following are the list of sectors that have been listed in **exclusion list**:

- Production, trading and maintenance of weapons and munitions of any kind.
- Trade in or unauthorized catching of wildlife or wildlife products

- Production or trade in any product or activity deemed illegal under Myanmar laws or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone depleting substances.
- · Hunting marine mammals and shark finning
- Using of dynamite and poison in fishery practices
- Activities involving harmful or exploitative forms of forced labour or harmful child labour
- Activities involving people smuggling of any kind





#### 7.4 Interaction with communities

Communities are one of the principal stakeholders of our business and in our materiality assessment for sustainability, the views of the community are important. We have adopted four (4) of the seventeen (17) UN Sustainable Development Goals.

Financial Inclusion (SDG 8)	<ul> <li>Enabling homeownership         uab bank provided 292 people with new home         ownership in the financial year which ended         on 31st March 2022 (compared to 208, the         previous year).</li> <li>Providing Digital Solutions         We launched mobile banking, uab pay and         internet banking to increase financial inclusion.</li> <li>Financial Literacy         We conducted various financial literacy         initiatives during the financial year. Despite the         COVID-19 and security issues, for FY 2022,</li> </ul>
	we went out to 10 villages and reached out to 300 villagers show how they could receive inward remittance from migrant workers outside Myanmar
Job Creation and Enterprise Development (SDG 9)	<ul> <li>Financing to SME         We provided financing to 1,180 SMEs, as of 31st         March 2022 (compared to 1,077 in previous         year) which not only enable enterprises to thrive         but also create job opportunities.</li> <li>Developing products and solutions for cash flow         management</li> </ul>
Employee Development and Training (SDG 4)	<ul> <li>Offering motivating working conditions</li> <li>Regular training to employees with 35,800 manhours in FY 2022 (over six months)</li> <li>17 University students were interned in FY 2022 and 16 in the previous year.</li> </ul>
Customer Satisfaction (SDG 3)	<ul> <li>Appropriate and suitable products</li> <li>Transparency</li> <li>Bancassurance launched covering life insurance and general insurance to be launches in the new financial year.</li> </ul>
	I

Further, in December of 2017, uab bank launched "Be The Change Myanmar" program and in 2020 set up uab Foundation to launch meaningful CSR activities.

The Bank's philanthropic contributions have been reported in 6.3 above.

## **Sustainability Statement**

## 7.5 Anti-corruption programmes and procedures

uab bank has formulated and implemented Anti-Bribery and Corruption Policy. The policies cover all the activities of the Bank, its subsidiaries and third-party service providers. In line with our belief of **ZERO TOLERANCE** towards corruption we:

- Raised awareness of the matters in various forums and how it could potentially impact the reputation of uab bank
- Circulated Anti-Bribery and Corruption
   Policy and Gift Guidelines to all employees
- Formulated and implemented Conflict of Interest Policy
- Developed a reporting mechanism (including establishing Whistleblower reporting channel)

Training and awareness on the Anti-Bribery and Corruption Policy is done at Orientation sessions and various training programmes of the Bank.

Reports of incidences are made through the **Operational Incident Reporting mechanism** (see Item 7.8).

#### 7.6 Creditors' rights

The Code of Conduct of uab bank requires that all business dealings must be conducted fairly and equitably.

The Bank operates its business with integrity and implements an honest and transparent information disclosure system treating all creditors equally and without discrimination. With information disclosure (including but not limited) to information on the Bank's annual reports, website, social media sites, agreements, statutory reports and brochures, all creditors are entitled to obtain relevant

information according to their needs to make an objective decision.

The protection of creditors rights is contained in the agreements made by both parties with the Bank ensuring contractual compliance and performance of its obligations in a timely manner so as to avoid delays that may result in loss or inconvenience to either party.

The Bank is careful to ensure that creditor's rights are fulfilled, and trust is maintained. All complaints from Creditors and incidences are reported via the Operational Incident Reporting mechanism (see Item 7.8 below).

#### 7.7 Central Bank of Myanmar Directives

uab bank endeavours to meet all stipulations of the Financial Institutions Law and Central Bank of Myanmar's directives. Where a stipulation or directive cannot be met, the Bank writes to the Central Bank requesting for waiver or additional time for compliance. The Bank is also subject to inspection by the Central Bank of Myanmar and all findings of inspections and audits are reported the Bank's Board of Directors together with Management responses and proposals for rectification. The external auditors and internal auditors also report on compliance to laws and regulations and this is also reported to the Board of Directors.

The Bank also makes daily, weekly, monthly, quarterly, six-monthly and yearly statistical reports to the Central Bank which indicate the level of its compliance.

The financial statements of the Bank are also published in the Bank's website.



### 7.8 Operational Incident Reporting mechanism.

Over FY 2022, the Disciplinary Committee of the Bank handled **11 cases** of disciplinary actions taken from complaints and infringement of the Code of Ethics and other Bank Policies

How we monitor and report incidents, complaints, and breach of policy & procedures

- Compliance Officers are appointed at all branches and head office departments.
   Their duties include the monitoring and adhering of all policies and procedures of the Bank.
- The Bank has adopted an Incident
  Reporting mechanism that requires the
  reporting of all operational incidents and
  breaches of Policy (as recommended
  by the Basel Standards). Such reporting
  is required to be made by Compliance
  Officers and Section Heads within 24 hours
  of the incident to the Risk & Compliance
  Department and Operations Department
  at Head Office. Incidents are further
  escalated to the relevant Supervisors.
- Further, the Bank maintains the following open lines to receive complaints from customers and stakeholders:
  - · Call Centre
  - · Email: info@uab.com.mm
  - · Facebook messenger
  - Branch counter
  - Whistleblowing on wb@uab.com.mm or by SMS on 09 – 44 44 36 309
- Each incident raised through the above will be reported through the Incident Reporting mechanism.

- Reported incidents are escalated to the relevant Supervisors and where this involves the breach of the Code of Ethics or misconduct, the incident is handled by the Disciplinary Committee.
- The reporting of all incidents is made to the Management Committee and Board Risk Committee by the Risk & Compliance Department through the Bank's Compliance Officer. The closure of all incidences reported is also monitored.
- Employees are also encouraged to report incidents through open communications to their Supervisors, Heads of Departments or Human Resources Business Partners.
- Confidentiality and whistleblowing protection are also available to employees as described in the Bank's Whistleblower Protection Policy.

#### 8. STANDARDS ADOPTED

The following standards were adopted in our non-financial reporting:

AA 1000 – this was used to assess stakeholder engagement to establish a materiality index as stated in our Sustainability Statement issued in our Annual Report and website.

**GRI** – This may be downloaded from our website

**SASB** – This may be downloaded from our website