

FirstRand anti-bribery policy



FIRSTRAND

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**policy
context
and
scope**

One | definitions

Employee means anyone who is permanently or ad interim / temporarily employed by FirstRand or on secondment / as a trainee at FirstRand, which includes, among others:

- all Executive Board members, Management and other staff of FirstRand;
- anyone who works at a majority owned company business; and
- anyone who works at a business under FirstRand's control.

Management means the people, so appointed, who are individually or jointly responsible for the decision-making, general operation and administration of FirstRand (e.g. at Group level, Corporate Centre level, divisional level, region level, business unit level and branch level).

Private Party means any individual or entity, other than a Public Official, with whom FirstRand representatives conduct business or have dealings on behalf of FirstRand.

Public Official means:

- (a) an officer or employee of a government or any department, agency or instrumentality thereof;
- (b) an officer or employee of any public enterprise, including any person who holds a legislative, administrative or judicial position of any kind whether appointed or elected;
- (c) an officer or employee of a public international organisation (e.g., the World Bank, the International

Monetary Fund, the World Trade Organization and the United Nations);

- (d) any person acting in an official capacity or exercising a public function for, or on behalf of, any such government or department, agency, instrumentality or public enterprise or for, or on behalf of, any such public international organization; or
- (e) any political party, party official, or candidate for political office.

Public Official also means officers, employees, representatives or agents of any entity owned or controlled directly or indirectly by a government, including a sovereign wealth fund or any entity owned by a sovereign wealth fund.

Related Party means a parent, spouse, spousal equivalent, child, sibling, uncle or aunt, and the spouse or spousal equivalent's similar relatives, and any company or business controlled by such individual or group of individuals.

Representatives means, employees, directors, subsidiaries, joint venture partners or third parties such as agents, consultants and intermediaries of FirstRand and all of its divisions.

Third Party means any individual (other than FirstRand personnel) or entity engaged to provide goods or services to or on behalf of FirstRand. It includes consultants, agents, and intermediaries.

two | policy context

2.1 Ensuring integrity in all business dealings

"Bribery blights lives. Its immediate victims include firms that lose out unfairly. The wider victims are government and society undermined by a weakened rule of law and damaged social and economic development. At stake is the principle of free and fair competition, which stands diminished by each bribe offered or accepted."^{*}

**Extract from the foreword to The (UK) Bribery Act 2010 Guidance about procedures which relevant organisations can put in place to prevent persons associated with them from bribing.*

FirstRand, a global banking institution, trades in trust. Its reputation as an innovative and ethical business is crucial to its strategy of emerging market growth and sustainable value creation. The FirstRand Group Code of Ethics reflects FirstRand's commitment to high levels of integrity and good governance in all business dealings.

The FirstRand Code of Ethics informs the FirstRand position with regards to bribery.

FirstRand recognises the moral and legal hazards which arise when doing business, therefore, it is deemed necessary to clearly state, by way of this policy, the Bank's position on bribery.

The Group strictly prohibits bribery among its employees, directors, subsidiaries, joint venture partners or third parties such as agents, consultants and intermediaries of FirstRand.

2.2 What is bribery?

Bribery is an act of dishonesty. When someone engages in fraud, they abuse their position through dishonesty – one person alone can commit fraud.

When someone engages in corruption or bribery they manipulate someone else to abuse their authority for their gain – at least two persons are involved in corruption.

The following examples could amount to bribery:

- Private payments to individuals in order to induce them to favour your company, or to obtain confidential information;
- Exchanging expensive gifts, cash or cash equivalents, or providing lavish entertainment to individuals with the intention to induce the award of business;
- Making political or charitable donations that are intended to influence the award of business;
- Accepting payments or other inducements from agents, vendors or sub-contractors in order to favour a Third Party, such as a supplier or sub-contractor;

- Manipulating tender procedures to award a contract to a specific sub-contractor or vendor in return for some form of payment or other favour; and
- Offering payments or other forms of benefit to a tax or customs official to overlook local taxation or customs requirements.

Transparency International defines corruption as the abuse of entrusted power for personal gain.

The South African Prevention and Combating of Corrupt Activities Act (2004) defines corruption as when one party gives to another party anything of value with the purpose of influencing them to abuse their power. This is called a gratification.

Bribery is a specific form of corruption that usually involves two different offences in the same transaction:

- With **active bribery** a briber offers an advantage (the bribe) in order to influence decisions or breach trust.
- With **passive bribery**, the receiver can have his decisions influenced or his trust broken by accepting the advantage.

The advantages offered or accepted can be financial (e.g. cash or shares), or non-financial benefits (e.g. the offer of a job) which may be offered or accepted directly or indirectly via third parties.

Usually, the advantages come attached with a direct demand or an inference that some personal favour is required. This conflict of interest will then constitute a bribe.

The act of bribery is unethical, against the law and carries criminal, civil liabilities and will damage the good reputation of FirstRand.

2.3 Purpose of the policy?

This policy is focussed on one specific form of corruption, namely bribery, and is designed to provide all stakeholders of FirstRand with guidance on its standards and measures towards combating bribery.

2.4 How to use the policy?

All representatives must be familiar with, and must act in compliance with the policy provisions.

This policy should be read in conjunction with:

The FirstRand Group Code of Ethics

For provisions on responsible business conduct

The FirstRand Group Whistle-blowing policy

*For provision on safe and effective
whistle-blowing*

The FirstRand Declarations of Interest policy

For provisions on the declaring of personal interests

The FirstRand Guidance Note on Conflicts of Interests

*For more detailed guidance on recognising
conflicts of interests*

The FirstRand Guidance Note on responsible gift giving and receiving

For detailed guidance on giving and receiving acceptable gifts

The FirstRand Guidance Note on gifts involving air travel and accommodation

For detailed guidance on accepting air travel and accommodation from others

The FirstRand Responsible Competitive Practices policy

For provisions on dealing appropriately with competitors and customers

In addition this policy should be read in conjunction with relevant local policy and locally or globally applicable anti-bribery and corruption legislation.

Three pieces of anti-bribery legislation require specific attention:

- The South African Prevention and Combating of Corruption Act (2004) in all transactions;
- The United States Foreign Corrupt Practices Act (1977) when dealing with parties holding interests in the United States of America; and
- The United Kingdom Bribery Act (2010) when dealing with parties holding interests in the United Kingdom.

Operations in India should note the Prevention of Corruption Act (1988) when engaging government.

2.5 Penalties for non compliance with the policy?

Engaging in active or passive bribery is an unacceptable unethical act and a crime.

Failure to comply with this policy constitutes gross misconduct and will result in disciplinary action being taken which may include suspension of directorships, termination of employment and the severing of business relationships, in addition to civil and criminal prosecution.

FirstRand reserves the right to pursue all legal means to recover proceeds generated through bribery from representatives or clients of the Group.

three | policy scope

3.1 Who should heed the policy?

The FirstRand Group anti-bribery policy is applicable to its representatives, being:

- Employees and directors;
- Subsidiaries and joint venture partners; and
- Certain third parties such as agents, consultants and intermediaries of FirstRand and all of its divisions.

Upon the discretion of FirstRand management selected

service providers, suppliers, and clients of FirstRand will be furnished with this policy with the expectation that they heed and comply with the conduct provisions of this policy.

3.2 Where is the policy applicable?

The FirstRand Group anti-bribery policy is applicable in all countries and regions in which the FirstRand Group operates.

four | conduct provisions on preventing and detecting bribery

4.1 Acting with integrity

The most effective way to combat bribery is to ensure all FirstRand representatives act with integrity.

Accordingly, all FirstRand representatives must:

- Be honest and transparent in their business dealings;
- Put the interest of FirstRand above personal interest.

- Declare and avoid both actual and perceived conflicts of interests;
- Act responsibly and prudently when giving and receiving gifts and hospitality;
- Prevent and report criminal and other unethical activities; and
- Declare and act responsibly when engaging in outside work and political activities.

More specifically, all representatives of FirstRand must:

- Always refrain from active and passive bribery offences; and
- Specifically refrain from active bribery involving local or foreign public officials

Organisationaly, FirstRand must:

- Take all reasonable measures to prevent active bribery among its representatives.

soliciting an advantage from another party that amounts to a breach of trust.

All Representatives of FirstRand must refrain from:

- Engaging third parties or agents to commit active or passive bribery.

All Representatives of FirstRand must:

- Report all observed or suspected acts of active and passive bribery to management of FirstRand; and
- Declare all gifts and other interests at least annually according to the conduct provisions of the Group Declaration of Interests Policy and local policy or regulatory requirements.

4.2.2 Bribery offences involving (foreign) public officials

This particular offence of active bribery occurs when the advantage is given or offered in order to influence the decisions of public officials.

In certain jurisdictions, notably South Africa, the United States and the United Kingdom the penalties for bribing a foreign public official are significant.

The UK Bribery Act, in particular, has specific provisions dealing with bribery offences involving public officials. For these offences, unlike the general offences described under item 4.2.1 above, there need not be a breach of trust when offering inducements to public officials.

Hence, a gift of any value offered to a public official may trigger a public official offence if it is offered in order to influence decisions or to ensure favourable treatment. The advantage (bribe) need merely to seek to influence the decisions of public officials for it to be considered unacceptable.

These offences involve giving (active bribery) or receiving (passive bribery) a bribe with knowledge that the action amounts or will be likely to amount to inappropriate influence and undue benefit.

All Representatives of FirstRand must refrain from:

Active bribery

- By not offering, promising, or giving an advantage within a business context to another party intending to influence his or her business decision amounting to a breach of trust.

Passive bribery

- By not, within a business context, accepting or

In addition, the USA Foreign Corrupt Practices Act has provisions regarding the giving of gifts and gratuities to foreign public officials.

Note: South African public officials are foreign officials to UK and USA enforcers, who may be able to exercise jurisdiction over bribes paid by South African nationals to South African public officials.

Hence the reference 'public official' applies to all public officials, local or foreign to South Africa.

All Representatives of FirstRand must refrain from:

- Offering, giving, or promising an advantage to any public official in order to influence or to ensure favourable treatment or in order to influence their decisions.

All Representatives of FirstRand must:

- Seek and acquire approval for all gifts and gratuities to be given to public officials, be they local or foreign; and
- Declare all gifts, irrespective of value, received from public officials, be they local or foreign.

4.2.3 Corporate failure to prevent bribery offences

FirstRand is committed to conducting business responsibly. Therefore it is continually making investments in policies, systems and human capital capable of combating bribery.

This commitment to responsible business is of particular importance because, under UK law, a failure on behalf of FirstRand to prevent active bribery by its representatives could make FirstRand liable for the criminal offence of failing to prevent active bribery.

Fortunately, there is a defence: provided there are adequate procedures in place to prevent bribery, FirstRand will not be liable for failing to prevent active bribery.

These procedures are designed to build an ethical culture and thus prevent and detect bribery. They act like an insurance policy, protecting the business and innocent members of management from being held liable for the actions of other FirstRand representatives. In addition to protecting our reputation, these procedures protect our business and add value to all our transactions.

Note: While the provision under this section is applicable to all countries in which the Group operates, deals originating from the UK or deals facilitated by our FirstRand UK office are directly subject to the Corporate Offences provisions of the UK Bribery Act of 2010.

Deal partners with public listing or significant business in the United States of America may, under certain conditions make FirstRand subject to the provisions of the Foreign Corrupt Practices Act of 1977.

Every division of FirstRand must:

A) Clearly demonstrate commitment to ethics promotion and bribery prevention

This means all managers must:

- Lead by example and clearly demonstrate their commitment to ethics promotion and bribery prevention;
- Cooperate with, and support the Group Ethics Office and Fraud Risk Management services;

- Promote this policy by ensuring that all employees they manage are aware of it and understand its content;
- Ensure high risk personnel receive training on the policy; and
- Ensure the FirstRand Ethics Line is promoted as a safe and effective whistle-blowing mechanism.

B) Conduct thorough bribery risk assessments when engaging in significant business deals

This means FirstRand must:

- Assess the nature and extent of its exposure to bribery risks periodically or on a case by case basis, in a systematic, informed and documented fashion;
- Obtain further guidance on bribery risks from their Risk Officer or Group Ethics Office.

C) Conduct risk mitigation through using proportionate ethics and bribery focussed due diligence on specific parties

This means all FirstRand divisions must:

- Assess in a systematic, informed and documented fashion, ethics and bribery due diligence performed on high risk employees;
- Assess in a systematic, informed and documented fashion, ethics and bribery risks on, consultants and other agents when establishing a business in a local or foreign market; and
- Assess in a systematic, informed and documented fashion, ethics and bribery risks on, when considering lending and investment transactions in a local or foreign market.

D) Maintain ethics promotion and anti-bribery awareness and knowledge

This means FirstRand divisions must:

- Make the Code of Ethics, whistle-blowing policy, declaration of interests, and this Anti-bribery Policy easily accessible to all representatives;
- Train, upon the discretion of management, all high risk representatives and employees on anti-bribery; and
- Require all employees and other representatives to report incidents of bribery using the Group Ethics Line or directly to management (see Ethics Line details, item 5.4 below).

E) Periodically review its ethics promotion and anti-bribery programme

This means FirstRand must:

- Include bribery risk in its internal audit and ethics management practices; and
- Annually report on identified short-comings and improvements to the Executive Committee and Board of FirstRand.

Note: Due to the size of the enterprise every possible bribery risk cannot practically be reviewed. Preventative measures put in place to combat bribery on the behalf of the organisation must be proportionate to the bribery risks faced by FirstRand. Common sense should always prevail and priority should be given to major high risk areas. Ask for advice from your divisional Risk Officer or Group Ethics Officer.

4.3 Supportive provisions on ethics promotion and bribery prevention

4.3.1 Gifts, entertainment and hospitality

It is customary to provide business associates, including Private Parties and Public Officials, with small gifts from time to time.

Employees and agents of FirstRand:

- May provide, and receive, gifts of modest value provided that the provision of such gifts:
 - a) is in accordance with local custom;
 - b) is not excessive, disproportionate or offensive; and
 - c) does not violate local laws and regulations,
- Must not give or receive gifts intended to influence business decisions of any kind;
- Must immediately declare gifts received from public officials, irrespective of value;
- Must declare gifts given or received from parties other than government officials that are above the declaration threshold that applies to the business area;
- Must seek approval from their line manager, prior to giving gifts to public officials;
- Must not, directly or indirectly provide, or accept, gifts in the form of cash or cash equivalent; and
- Must, when in doubt, seek advice from the divisional ethics officer or the Group Ethics Office.

Gift declarations, as a general rule, must be made to a line manager.

For further guidance on gifts please consult the FirstRand Group Guidance Note on Giving and Receiving of Gifts or local equivalent.

Note: In certain parts of the FirstRand Group it may be a normal part of business to promote, demonstrate and explain the benefits of FirstRand's products or services, in the course of which reasonable hospitality, gifts, or entertainment is provided.

The concrete value of hospitality, gifts, and entertainments that are "reasonable in amount", "not excessive" and "proportionate" may vary between jurisdictions depending on cultural and economic standards and traditions. FirstRand employees should check, if possible, beforehand with their line manager if they are in any doubt as to their appropriateness, whether offered, given or received.

4.3.2 Business meals

FirstRand may host meals and receptions for business associates, including Private Parties and Public Officials, and may participate in meals and receptions hosted by business associates, provided that the:

- Host or a suitable representative is present for the meal and/or reception;
- Meal and/or reception is reasonable in amount and not extravagant;
- Venue is not inappropriate or disrespectful; and
- Meal and/or reception is directly related to the promotion or explanation of FirstRand (or the business associate's) products or services or to the execution or performance of a contract.

4.3.3 Travel and accommodation

FirstRand representatives may host business associates, including Private Parties and Public Officials, at events that require travel and accommodation,

including airfare, local transportation and lodging, and may participate in such events hosted by business associates, provided that such travel and accommodation are:

- Reasonable in amount and not extravagant; and
- Directly related to the promotion or explanation of FirstRand business (or the business associate's) products or services, or to the execution or performance of a contract.

For further guidance on gifts involving travel and accommodation, please refer to the FirstRand Group Guidance Note on Gifts involving Air Travel and Accommodation.

4.3.4 Business related entertainment

FirstRand representatives may host business associates, including Private Parties and Public Officials, at sporting and cultural events, such as concerts, sport events or other live performances, and may participate in such events hosted by business associates, provided that the:

- Host or a suitable representative is present for the entertainment;
- Entertainment is directly related to the promotion or explanation of FirstRand business (or the business associate's) services, or to the execution or performance of a contract;
- Total value, per person, of the entertainment is reasonable in amount and not extravagant; and
- Event is not inappropriate or disrespectful.

Note: pre-approval from management is required when entertaining government officials.

4.3.5 Facilitation payments

A facilitation payment is usually a small cash payment to an official, in order to speed up a process that has already been paid for e.g. obtaining visas or permits. These payments are illegal in most countries the Group operates in.

FirstRand representatives, unless facing situations of risk to safety or health, must not give facilitation payments, and must:

- Challenge the demand for payment;
- Resist payment; and
- Immediately declare to divisional Ethics Officer or local Head of Compliance that such a demand has been made.

4.3.6 Charitable donations and sponsorships

The giving to charity or sponsoring of business related events are important and valued parts of what FirstRand does. But giving to charities or sponsoring events that are associated with public officials is high risk because of the inference that donations or sponsorships may in fact be seeking to gain the official's influence.

FirstRand or FirstRand representatives must:

- Refrain from giving charitable donations or making sponsorships with the real or perceived purpose of securing an unfair advantage or undue benefit;
- Make all charitable donations through the management and governance structures of the FirstRand Foundation; and
- When making donations or sponsorships through the FirstRand Foundation are not practical, declare such donations or sponsorships to the divisional or Group Ethics Officer.

Note: this policy does not cover a FirstRand representative's donations given in a private capacity.

4.3.7 Political donations

Contributions on behalf of the Bank to a political party, candidate or campaign must be approved in advance in writing by the FirstRand Limited Board.

Contributions to political parties or candidates by Bank employees, acting solely in their personal capacities, may not involve the use of any Bank funds, office space or property.

4.3.8 Coerced payments

A coerced payment may also be called a 'life and limb' payment. It is a payment made by a FirstRand representative under the threat of violence, actual violence, or when not making payment it will reasonably be considered to endanger the life or health of the representative or others.

In such circumstances the safety and health of all representatives is paramount but FirstRand representatives must:

- Immediately report any coerced payments extracted by third parties to management and the Group Ethics Office.

4.3.9 Third party (agents and consultants) fees

FirstRand representatives must:

- Ensure all fees paid to third parties are reasonable in relation to the genuine services provided by the third party to or on behalf of the Bank or as approved in advance;

- Refrain from making any payment to a third party without receipt of a detailed invoice that fully and accurately describes the services provided and expenses incurred; and
- Refrain from making cash payments to third parties.

Note: Payments to off-shore accounts where possible must be avoided. In connection with commission payments, agents must provide services in the best interests of the client.

4.3.10 Maintenance of accurate books & records

FirstRand representatives must:

- Make and keep books, records, and accounts which, in reasonable detail, accurately and fairly reflect any transactions involving expenditures on behalf of the Bank;
- Ensure records include all expenditures related to prospective and current customers of the Bank, the reasons or justifications for such expenditures, and all contracts, invoices and receipts relating to the purchase of goods and services;
- Ensure all expense reports be submitted to, and accepted by the relevant line manager;
- Ensure reports include cost summaries that give details of gifts and hospitality; and
- Refrain from misleading or false entries that conceal the source or nature of expenditures or receipts are prohibited.

Note: No payment or receipt on behalf of the Bank may be approved or made with the intention or understanding that any part of that payment or receipt is to be used for a purpose other than that described in the relevant books and records.

**policy
application**

five | policy application

5.1 Policy exceptions

Only in extraordinary circumstances may exceptions or waivers to aspects of this policy be granted.

All exemption applications must be lodged with the Group Ethics Office where after it will be referred to the FirstRand Board for consideration.

5.2 Policy violations

All FirstRand representatives are subject to this Policy and must comply with the Policy.

FirstRand will view any violation of this Policy or failure to report a violation as a significant matter that warrants disciplinary action, up to and including termination of employment.

5.3 Seeking advice about bribery

Whenever you are uncertain about how to manage an expectation or a request for a bribe, facilitation payment or compliance to local laws in your country of operation all FirstRand representatives must:

- Seek advice from the divisional Ethics Officer or Group Ethics Officer.

5.4 Reporting bribery

FirstRand representatives must:

- Report suspected or observed cases of bribery or corruption either directly to senior management or by using the Ethics Line facilities:

0800 00 33 12 (South Africa)

0808 238 75 00 (United Kingdom)

000800 100 79 00 (India)

E-mail: report@firstrandethicsoffice.com

Web reporting tool: www.firstrandethicsoffice.com

Please see back of this booklet for all international contact numbers.

5.5 Policy administration

The FirstRand Group Ethics Office within Group Regulatory Risk Management is responsible for uniform implementation of this policy. The head of each business entity within the FirstRand Group (such business entities being controlling companies, controlling entities, clusters, subsidiaries, sub-clusters, divisions, departments or business units) is responsible for ensuring integration of the policy into the day-to-day activities of the business entity. Business units have overall responsibility for the maintenance and operation of this policy. The business units, in turn, are assisted by deployed risk and compliance officers in implementing the policy.

Advice and guidance on this policy can be obtained from the FirstRand Group Ethics Office.

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FirstRand Group anti-bribery policy **quick reference guide**

FirstRand's reputation as an innovative and ethical business is crucial to its strategy of emerging market growth and sustainable value creation.

who?

The FirstRand Group anti-bribery policy is applicable to its representatives being its employees, directors, subsidiaries, joint venture partners or third parties such as agents, consultants and intermediaries of FirstRand and all of its divisions.

where?

In all countries in which the Bank operates.

Upon the discretion of FirstRand management selected service providers, suppliers, and clients of FirstRand will be furnished with this policy with the expectation that they heed and comply with the conduction provisions of this policy.



**The Group strictly prohibits bribery
by its representatives**

what?

Bribery is a specific form of corruption:

- In active bribery someone gives a bribe
- In passive bribery someone receives a bribe

Bribes may take the form of offering, promising, giving, requesting, or receiving of an undue benefit, which can be financial or non financial, with the intention to inappropriately influence the receiver to abuse their power. The act of bribery is unethical, against the law and carries criminal, civil, and reputational liabilities for both FirstRand and its representatives.



Integrity is our best defence

The most effective way to combat bribery is to ensure all FirstRand representatives act with integrity.

Accordingly, all FirstRand representatives must:

- Be honest and transparent in their business dealings;
- Declare and avoid both actual and perceived conflicts of interest;
- Act responsibly and prudently when giving and receiving gifts and hospitality;
- Prevent and report bribery and other unethical activities; and
- Declare and act responsibly when engaging in outside work and political activities.

What should you do?

More specifically, all representatives of FirstRand must:

- Refrain from active and passive bribery offences
- Refrain from active bribery involving a local or foreign public official

What should the Group do?

Organisationaly, FirstRand must:

- Take all reasonable and proportionate ethics promotion and anti-bribery measures to prevent active bribery by its representatives.

Report suspected or observed cases of bribery:

0800 00 33 12 (South Africa)

0808 238 75 00 (United Kingdom)

000800 100 79 00 (India)

E-mail: report@firstrandethicsoffice.com

Web reporting tool: www.firstrandethicsoffice.com

The FirstRand Group
encourages safe and
effective whistle-blowing -
we will not tolerate victimisation
of those reporting in good faith.

Always report suspected
cases of bribery.

Consult the FirstRand Group Code
of Ethics and the FirstRand Group
Whistle-blowing Policy
for more information.

Please see back of this booklet for all international contact numbers.



FIRSTRAND

FirstRand Group Ethics Line toll free numbers
0800 00 33 12 (South Africa and Namibia)
0808 238 75 00 (United Kingdom)
000800 100 79 00 (India)

FirstRand Group Ethics Line e-mail
report@firstrandethicsoffice.com

FirstRand Group Ethics Line website
www.firstrandethicsoffice.com

Leading Light e-mail
leadinglight@firstrand.co.za

FirstRand Botswana Ethics Line toll free numbers
0800 600 644 (Botswana Telecoms users)
1144 (Orange users)
71119711 (Mascom users)

FirstRand Ghana Ethics Line RSA underpinning number
+27 31 571 5077

FirstRand Mozambique Ethics Line toll free number
800 112 233 (TDM)

FirstRand Tanzania Ethics Line toll free number
0800 110 025 (TTCL)

FirstRand Zambia Ethics Line toll free number
50800 (Zambia Airtel users)