

ANTI-BRIBERY AND CORRUPTION & ANTI-FRAUD STATEMENT

Guaranty Trust Bank Limited (the **Bank**) is committed to conducting its business with integrity, transparency and in strict compliance with applicable anti-bribery, anti-corruption and anti-fraud laws and regulations. We recognise that such acts undermine economic development and pose significant legal and reputational risks to the Bank.

The Bank has zero tolerance for any form of bribery, corruption, fraud and unethical practices among employees, between the Bank and its employees, as well as between the Bank and external parties. We also expect the same standards to be applied by third parties acting on behalf of the Bank.

Our Code of Business Conduct and Ethics Policy provides the requisite standards and principles on ethical conducts and practices expected/required of all staff and our related stakeholders. Through our internal controls, employee training and third-party oversight, we aim to uphold the highest standards of accountability and ensure that our business is conducted in a fair, honest and lawful manner at all times.

This standard is not just to official working hours of our employees but extends to situations when business partners and/or prospective customers are entertained, during attendance of professional events or on official trips when representing the Bank in any capacity.

TRAINING

We recognise that effective training and awareness are essential components in the prevention of bribery, corruption and fraud. Thus, our training schedule is continuously reviewed to reflect regulatory changes, emerging risks and industry developments. Through these efforts, we aim to embed a strong ethical culture and empower our staff to act with integrity in all aspects of work. We are committed to ensuring that all employees are equipped with the knowledge and tools required to identify, prevent and appropriately respond to such acts.

This statement is made pursuant to various applicable anti-bribery and anti-corruption laws, including but not limited to, the *Economic and Financial Crimes Commission Establishment Act, 2004*, the *Corrupt Practices and Other Related Offences Act, 2000*, the *Advance Fee Fraud and Other Fraud Offences Related Act, 2006*, the *Money Laundering (Prevention and Prohibition) Act, 2022* and the *Central Bank of Nigeria (Anti-Money Laundering, Combating the Financing of Terrorism and Countering Proliferation Financing of Weapons of Mass Destruction (AML/CFT/CPL) in Financial Institutions) Regulations, 2022*.

We also acknowledge the extra territorial implications of the United Kingdom's Bribery Act, 2010 (as amended), the *Foreign Corrupt Practices Act, 1977* (as amended) and other related international legislation.

As a leading financial institution, we are committed to upholding the highest standards of ethical conducts in all our activities and interactions.

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