



FirstRand

CODE OF ETHICS

21 May 2019

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1 PROMISE FROM LEADERSHIP

Our business is growing and becoming more complex. We, the leadership of FirstRand therefore, consider it necessary to codify the values and principles that define our business. The result is the FirstRand Code of Ethics.

The defining slogan of the FirstRand Code of Ethics (Code of Ethics), namely **responsibly advancing our entrepreneurial spirit**, captures FirstRand's ethos of creating value in an accountable manner.

The Code of Ethics is a promise to all our stakeholders that we will combine our entrepreneurial spirit with a commitment to responsible business practice.

The Code of Ethics forms the constitution, or the base reference point, for the business practices of all businesses in FirstRand.

We have purposely developed the Code of Ethics in such a manner that it not only provides useful general guidance for all, but also allows room for interpretation in our various business environments.

All FirstRand employees, executives, non-executives, all other employees, representatives, agents and third parties doing business with FirstRand must read and ensure that they understand the Code of Ethics and any other related policies and procedures. It is your responsibility to know how the Code of Ethics relates to you and your role.

Should you require ethics advice, consult the Code of Ethics, because it sets out appropriate ways to obtain such guidance. Should you observe conduct that you believe to be contrary to our values and guiding principles, you must report these incidences, again using the prescribed approaches. Importantly, FirstRand is committed to treating all suspected or confirmed contraventions of the Code of Ethics individually, according to their merits and in their specific contexts, and taking applicable policy, law and other relevant considerations into account.

We are personally committed to the Code of Ethics. We appeal to each of you to match our commitment, so that we can safeguard the trust in FirstRand and positively influence the environment in which we operate.

Alan Pullinger FirstRand CEO

2 DESCRIBING THE FIRSTRAND VALUES AND PRINCIPLES

To advance our entrepreneurial spirit responsibly, FirstRand commits to two values:

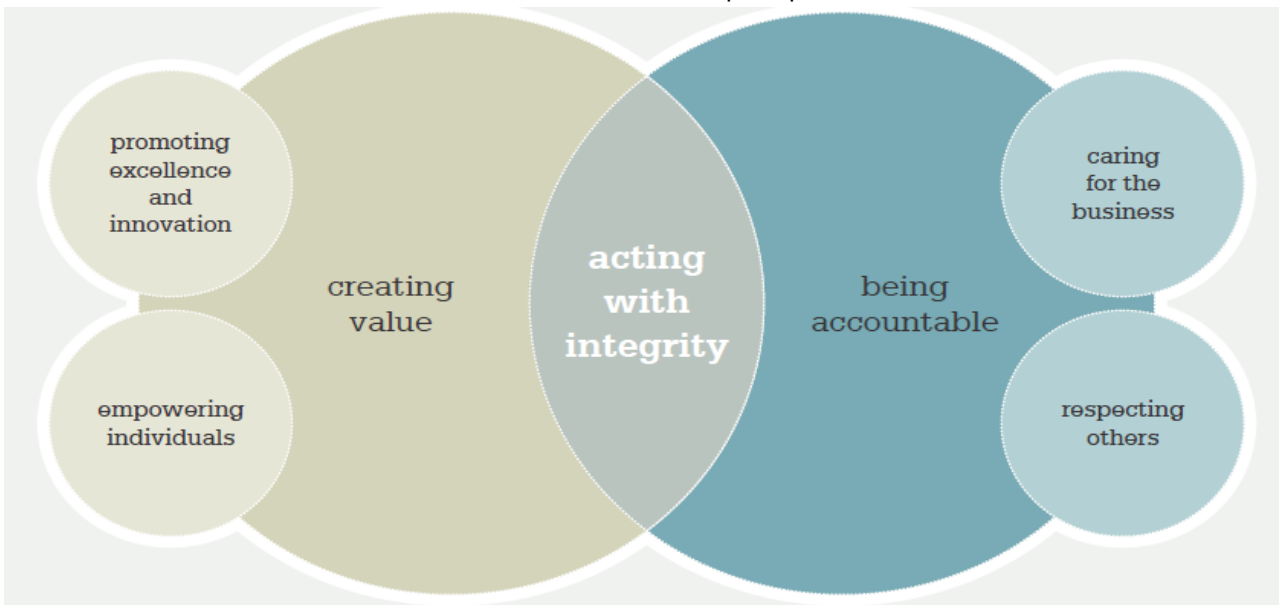
- creating value; and
- being accountable.

To live these two values, we must adhere to the following principles:

- promote excellence and innovation;
- empower individuals;
- care for the business; and
- respect others.

We also acknowledge that to live these principles successfully, in a value-creating and accountable fashion, we need to exhibit **integrity in everything we do**.

It must be evident in our behaviour that we subscribe to these principles.



Responsibly advancing our entrepreneurial spirit.

3 FIRSTRAND'S REPUTATION

Our biggest asset is the trust that customers place in our ability to manage their assets, and their willingness to purchase financial products and services from us on an ongoing basis.

We build trust by consistently keeping our promises.

Without trust, our customers will dwindle, our shareholders will desert us, and our businesses will suffer. Our reputation as a collective of trustworthy businesses is our wealth.

The building and protection of our reputation is, therefore, of the utmost importance.

At FirstRand, values combined with innovative ideas capture our shared business philosophy. Thus, we believe that advancing our entrepreneurial spirit responsibly is the best way of safeguarding and strengthening our reputation. This means that we must seek to perform at our technical and ethical best when creating value.

Our values and principles must guide our every decision and action to achieve fair and sustainable returns and create stable relationships with all our stakeholders.

4 PURPOSE AND SCOPE OF THE FIRSTRAND CODE OF ETHICS

4.1 Identifying obligation and suggestions in the code of ethics

The Code of Ethics is the constitution of our businesses and acts as a behavioural guideline for all our business practices. It contains various expectations and suggestions to ensure that we responsibly advance our entrepreneurial spirit. Expectations are what we must or ought to do – and these can be identified using the word 'must'.

In this Code of Ethics, the word 'must' has either a directive or an aspirational meaning.

'Must' used as a directive: for example - you must report observed or suspected misconduct.

In this context 'must' means it is an obligation that must be met and a failure to do so will result in some form of disciplinary action as defined in the various FirstRand Group Disciplinary Code and Procedure.

'Must' used as an aspiration: for example - you must be committed to, and be passionate about, what we do.

In this context 'must' means it is an ideal that we strive towards, and a failure to do so every single day may not necessarily result in disciplinary action as defined in the various FirstRand Group Disciplinary Codes.

Therefore, whenever you see the word 'must', either as a directive or an aspiration in the Code of Ethics, it means that compliance is expected, and that the consequences of non-compliance will be considered in context, on merit and on a case-by-case basis.

Suggestions are what we propose only as a possible best option and these can be identified using the word 'may'.

For example —you may report theft, fraud or corruption using the FirstRand ethics line.

'May' means it is a suggestion and you may use other methods to report unethical conduct.

Failure to follow a suggestion will not result in any form of corrective action. Therefore, whenever you see the word 'may' in the Code of Ethics, it means that the specific behaviour is a guideline and a suggestion only.

A failure to comply with the Code of Ethics obligations, in both the letter and in spirit, will result in disciplinary action, which may in some cases lead to termination of employment or the suspension of work agreements. FirstRand may, from time to time, amend the Code of Ethics. These changes will be communicated to all employees and other stakeholders.

4.2 Scope of the code of ethics

The code of ethics applies to:

- all employees, at all levels of responsibility, in all businesses in FirstRand;
- suppliers and service providers of FirstRand; and
- independent non-executive directors of FirstRand or any of its businesses when acting in an official capacity.

4.3 Purpose of the code of Ethics

Purpose of the Code of Ethics

- the Code of Ethics is the most important policy document in the organisation and defines acceptable behavioural standards within which employees are empowered to act;
- it provides the basis of, and a common reference point for, all current and future policies in every FirstRand business; and
- it is required from a best-practice governance and compliance perspective.

Required application of the Code of Ethics

- the Code of Ethics must be read by all employees, and it must be kept in electronic or printed format for easy reference;
- it must be built into performance agreements and training programmes in all FirstRand businesses; and
- it must be used as the first reference point for employees to resolve any ethical issue that they may encounter.

5 APPLYING FIRSTRAND VALUES AND PRINCIPLES

Two values held dear by FirstRand are:

1. Creating value; and
2. Being accountable.

Five supporting principles give these values operational meaning:

1. **Acting with integrity** - this principle guides us in balancing our pursuit of profit with accountable business conduct.
2. **Promoting excellence and innovation** - this principle expresses our desire to be the best at what we do.
3. **Empowering individuals** - this principle acknowledges that we will not be able to achieve excellence and innovation if we do not develop our people appropriately and adequately.
4. **Caring for the business** - this principle expresses our awareness that an obligation to take proper care of our businesses is at the root of responsible business practice.
5. **Respecting others** - this principle acknowledges that to take proper care of our businesses, we must respect our various stakeholders.

The principles underpinning our values provide us with detail about how our values apply in the workplace. When living our values, we must adhere to the minimum behavioural requirements laid down in these principles.

5.1 Principle: Acting with Integrity

Acting with integrity requires us to be truthful, trustworthy, consistent, fair and honest in all our actions and decisions. We act with integrity by:

- being honest;
- avoiding actual, potential and perceived conflicts of interest;
- being responsible when giving and receiving gifts and hospitality;
- preventing and reporting criminal and other unethical activities; and
- being responsible when engaging in outside work and political activities.

5.1.1 *Being honest*

To ensure honesty, we must:

- interact truthfully with all stakeholders;
- not make any false, misleading or malicious statements;
- report accurately on performance, achievements and challenges;
- produce accurate and timely statements and reports;
- deliver on promises made and agreements reached; and
- engage with competitors responsibly.

For more information, please refer to the FirstRand Responsible Competitive Practices policy.

5.1.2 *Avoiding actual, potential and perceived conflict of interests.*

To avoid actual, potential and perceived conflicts of interest, we must:

- disclose any personal or close relationship interest that could influence business dealings within FirstRand or with the employees of FirstRand;
- avoid any situation and relationships that may involve or pose a conflict of interest between your personal interests and the interests of FirstRand; and
- not attempt to influence persons in private or public office to obtain improper gain or advantage.

For more information, please refer to the FirstRand Conflict of Interest Management policy.

5.1.3 *Being responsible when giving and receiving gifts and hospitality*

To give and receive gifts responsibly, we must, in our personal capacity:

- not solicit or accept any item that will influence us in not objectively performing our duties;
- not accept loans from clients or suppliers;
- not give or receive gifts with the purpose of inappropriately influencing people;
- not give or receive cash gifts or cash vouchers of any value; and
- declare all gifts with a value above the amount set by the individual FirstRand business, in the business's gifts register.

For more information, please refer to the Gifts policy or guidance note in your business.

5.1.4 *Preventing and reporting criminal and other unethical activities*

To prevent unethical and criminal activities we must:

- report observed or suspected unethical conduct through the appropriate reporting mechanisms described under sections 7.1 and 7.2 of the Code of Ethics;
- not become involved in any criminal and/or unethical activity in our work or private life; and
- employ all available and appropriate legal means to ensure that FirstRand combats crime from internal and external sources.

For more information, please refer to the FirstRand Whistle-blowing policy

5.1.5 *Being responsible when engaging in outside work and political activities*

Because we understand that we need to devote our best effort to FirstRand, we must:

- not engage in any other remunerated activity without appropriate consent;
- not accept commission or remuneration for work that is not explicitly and contractually defined in FirstRand or its businesses' work arrangements without appropriate consent;
- be responsible when engaging in party-political activities, making sure we do not bring FirstRand's name into disrepute; and
- not make use of FirstRand resources to conduct private or party-political activities.

Note that valid participation in the activities of a recognised trade union would not constitute a conflict of interest.

5.2 Principle: Promoting excellence and innovation

We challenge conventional wisdom by constantly developing new solutions to move beyond the minimum accepted standards and to foster our entrepreneurial spirit. We promote excellence and innovation by:

- building a result-oriented culture;
- providing exceptional client service; and
- being professional.

5.2.1 *Building a result-oriented culture*

To focus our energy on creating sustainable profit for FirstRand, we must:

- be committed to, and be passionate about, what we do;
- act proactively to address challenges creatively and with confidence;
- encourage our colleagues to suggest creative and innovative alternatives; and
- always strive to create profit for FirstRand within legal and ethical boundaries.

5.2.2 *Providing exceptional client service*

To ensure that we provide our clients with quality products and services to suit their needs, we must:

- seek long-term, mutually beneficial relationships with our clients;
- responsibly determine client needs;
- provide innovative financial solutions, which serve the specific needs of the selected target market;
- either resolve or report incidents of bad or inappropriate service as soon as possible; and
- treat all clients objectively and without unmerited prejudice.

5.2.3 *Being professional*

To meet the highest standards of professionalism, we must:

- maintain professional conduct in our interaction with internal and external stakeholders, at all levels;
- celebrate our own successes with humility;
- acknowledge the successes of others;
- not claim credit for other people's work; and
- not engage in destructive office politics.

5.3 Principle: Empowering individuals

We believe that it is in the direct interest of FirstRand to create empowering business environments in which our employees can flourish. We empower individuals by:

- providing inspirational leadership;
- providing opportunities for professional development; and
- communicating effectively.

5.3.1 *Providing inspirational leadership*

To provide inspirational leadership in all our businesses, we must:

- encourage an owner-manager culture;
- make appropriate appointments in line with FirstRand's employment strategies;
- expect leaders to lead by example and to 'walk the talk'; and
- give fair rewards to achievers and direct guidance to those who struggle.

5.3.2 *Providing opportunities for professional development*

To create an empowering environment, with opportunities for creativity, innovation, growth and development for our employees, we must:

- assume personal responsibility for our own development and training;
- always explore and be receptive to innovation;
- appropriately recognise and reward employees that excel;
- provide our employees with the resources, support and training necessary to do the job; and
- actively, regularly and objectively participate in performance-evaluation processes, when and where required.

5.3.3 *Communicating effectively*

To maintain effective and clear communication, we must:

- foster a culture of open communication in our business areas;

- participate in discussions and other communication that would benefit from our input;
- be receptive to positive and constructive criticism;
- always focus on the message and not the messenger; and
- share relevant business information with colleagues and clients to allow them to make informed decisions.

5.4 Principle: Caring for the business

We take full ownership for all our actions and omissions, and we deliver on our commitments to one another, our clients and other stakeholders. We accept full personal responsibility for our actions. We care for the business by:

- protecting FirstRand's good name and reputation;
- adhering to good governance practices;
- using company resources effectively and responsibly; and
- honouring confidentiality.

5.4.1 Protecting FirstRand's good name and reputation

To protect FirstRand's name and reputation we must:

- uphold FirstRand's values and principles;
- not engage in private activities that could bring FirstRand into disrepute;
- foster and protect FirstRand's image; and
- demonstrate loyalty and commitment to FirstRand.

5.4.2 Adhering to good governance practices

To ensure good governance, we must:

- comply with applicable laws regulations and industry guidelines; and
- comply with all internal policies and procedures

5.4.3 Using company resources effectively and responsibly

To use FirstRand's resources effectively and responsibly, we must:

- safeguard resources, such as buildings, vehicles, computers and furniture, and ensure that we apply these resources wisely;
- ensure the efficient use of 'company time'; and
- not use FirstRand's resources for illicit private purposes and personal enrichment.

5.4.4 Honouring confidentiality

To protect our clients, shareholders and other stakeholders, we must:

- ensure that client information is secure;
- protect our intellectual property and that of our clients;
- not use confidential information improperly; and
- not become involved in any way in insider trading, foreign exchange rigging or similar unethical conduct.

For more information, please refer to the Personal Account (PA) Trading policy in your business.

5.5 Principle: Respecting others

We recognise the inherent worth of all people, and we acknowledge that our obligations correspond with our individual rights. We respect others by:

- protecting the dignity of stakeholders;
- being fair;
- valuing diversity; and
- protecting the interests of society and the natural environment.

5.5.1 Protecting the dignity of stakeholders

To create a dignified working environment, we must:

- not become involved in any form of victimisation or intimidation;
- not use offensive language and insensitive communications;
- create a work environment that is free of harassment, sexual or otherwise; and
- avoid creating, sending and forwarding email messages that contain statements or material that anyone could reasonably perceive to be discriminatory, offensive, pornographic, defamatory, illegal or harassing in nature.

For more information, please refer to the Sexual Harassment policy in your business and the FirstRand Group Acceptable Use of Information Resources policy.

5.5.2 Being fair

To be fair, we must:

- be consistent in our judgements and, as far as possible, apply similar actions to similar situations;
- respect the dignity and basic human rights of our colleagues, clients and other stakeholders;
- not discriminate against any person because of gender, race, religion, marital status, economic status, sexual orientation or disabilities; and

- promote and maintain fair labour practices, including through the provision of a healthy and safe environment.

5.5.3 Valuing diversity

To value diversity, we must:

- promote a culture that respects and makes the best possible use of the diversity of our employees;
- appreciate and respect the reasonable traditions and the cultures of the employees; and
- be sensitive to, and make reasonable accommodation for, the traditions and cultures of clients.

5.5.4 Protecting the interests of society and the natural environment

To protect the interests of society and the natural environment, we must:

- be responsive to the legitimate and viable needs of the communities in which we operate;
- minimise the environmental impact of our businesses; and
- not provide services to clients if sufficient and reliable evidence exists in the public domain that those clients systematically fail to protect the rights of people or irresponsibly damage the natural environment.

For more information, please refer to the Environmental policy and the Social Engagement policy in your business.

6 MAKING THE CODE OF ETHICS WORK

In FirstRand, our entrepreneurial spirit directs us to extract maximum value from all investments. This is also true for our investment in the Code of Ethics.

Codifying our values and guiding principles is not enough to ensure that we consistently live these standards in all our businesses.

Thus, various enabling mechanisms support the Code of Ethics. These mechanisms ensure that the values and guiding principles contained within the Code of Ethics remain, or become, part of the culture of FirstRand.

6.1 Ethics offices

The most important enabling mechanism is the FirstRand Ethics and Conduct Risk office, which acts as formal custodian of the Code of Ethics.

The FirstRand Ethics and Conduct Risk office has representatives in every business in FirstRand.

7 SEEKING GUIDANCE AND REPORTING

7.1 Seeking guidance confidentially

There may be times when you are uncertain whether a decision or action that you are required to carry out is consistent with the letter and spirit of the Code of Ethics or other related policies. In such cases, you must obtain advice on how to proceed.

If you have any query or concern, or if you need guidance or advice:

- 1) You must approach a team member. He or she knows your work situation well and may be able to assist you confidentially.**

If you feel that you cannot do this for good reason or require further input, then:

- 2) You must approach your line manager. He or she also knows your work situation well and may be able to assist you confidentially.**

If you feel that you cannot do this for good reason or require further input, then:

- 3) You must approach another manager or human resource official or director. All managers, human resource officials and directors are required to maintain the highest ethical standards and, as part of their responsibility, to guide employees in the application of the Code of Ethics.**

If you feel that you cannot do this for good reason or require further input, then:

- 4) As a last resort, you must speak to the Ethics Office in your business, or the FirstRand Ethics and Conduct Risk office.**

Important points when seeking guidance confidentially:

- first, try to keep your concerns as close to the source as possible by approaching directors or ethics officers only if you are certain that colleagues, immediate line management or human resource officials cannot help you;
- you must ask for ethics advice if you are uncertain;
- all managers, human resource officers, directors and ethics officers must deal with requests for ethics advice in the strictest confidentiality; and
- the ethics advice process is not a mechanism to voice grievances that you may have with colleagues.

If you feel you have a legitimate grievance, please revert to the grievance procedures in your business.

Confidentiality means that the person providing advice will know your identity when you seek advice, but will not make your identity known to anyone else without your permission, unless there is an over-riding legal or ethical obligation to do so.

A commitment to confidentiality does not prevent you from escalating important issues should it be in the interest of FirstRand to do so.

7.2 Reporting theft, fraud or corruption, confidentially, partially anonymously or anonymously

You must report observed or suspected conduct that is inconsistent with the letter and spirit of the Code of Ethics by following the processes set out below.

If the issue involves theft, fraud or corruption:

- 1) You must report the issue to FirstRand Group Crime and Security, or the internal audit department in your business.**

If you feel that you cannot do this for good reason, then:

- 2) You must report the issue to the FirstRand ethics line.**

If you feel that you cannot do this for good reason, then:

- 3) You must report issues of this nature to the FirstRand Ethics and Conduct Risk office or any of its representatives in your business.**

Important points when reporting theft, fraud or corruption:

- you may report incidences confidentially, partially anonymously or anonymously;
- when reporting, you must clearly state:
 - which alleged wrongdoing you are reporting;

- where and when (dates and times, if available) the alleged wrongdoing took place;
 - who was involved in the alleged wrongdoing;
 - how the individual or firm committed the act; and
 - why you believe the activity to be improper.
- you may refer to the FirstRand Whistle-blowing policy for more information on responsible and safe reporting of unethical conduct;
 - all managers, human resource officials, directors and ethics officers must deal with reports of unethical conduct in strict confidentiality;
 - if you wish to report partially anonymously or anonymously, you may use the FirstRand ethics line which is managed by Deloitte; and
 - if you are reporting partially anonymously or anonymously, it is your responsibility to ensure that you provide Deloitte with enough information to act effectively upon your partially anonymous or anonymous report.

Partial anonymity means that your personal details will be known to only the external third-party that manages this tip-off facility. At no time are these details divulged to FirstRand. If needed, the external third-party will contact you to obtain further information.

Anonymity means that you do not state your name when reporting unethical conduct. It is your responsibility to ensure your anonymity when making your report and afterwards.

7.3 Reporting unethical conduct not related to theft, fraud or corruption, either confidentially, partially anonymously or anonymously

You may report observed or suspected conduct (other than theft, fraud or corruption) that is inconsistent with the letter and spirit of the Code of Ethics or related policies by following the processes set out below.

If the issue involves conduct that is contrary to our values and principles but it is not related to theft, fraud or corruption:

1) You must report the issue confidentially to your line manager.

If you feel that you cannot do this for good reason, then:

2) You must report the issue confidentially to another manager, human-resource officer, or human-resource executive.

If you feel that you cannot do this for good reason, then:

3) You must report the issue confidentially to the FirstRand Ethics and Conduct Risk office or any of its representatives in your business.

If you feel that you cannot do this for good reason, then:

4) You must report the issue via the FirstRand ethics line.

Important points when reporting conduct not related to theft, fraud or corruption:

- you may report such incidences of unethical conduct, confidentially, partially anonymously or anonymously;
- please note that it may be much more difficult to act successfully on anonymous reports as opposed to confidential reports;
- you may, but are not obliged to, report confidentially or partially anonymously rather than anonymously, to enable FirstRand to deal with your report as effectively as possible;
- you may refer to the FirstRand Whistle-blowing policy for more information on responsible and safe reporting of unethical conduct; and
- all managers, human resource officials, directors and ethics officers must deal with reports of observed or suspected unethical conduct with the strictest confidentiality

7.4 Responsibility to seek advice or to report

FirstRand must ensure that safe and effectively managed processes are in place for employees to seek advice or report unethical conduct. In turn, all FirstRand employees and its businesses must report unethical conduct, or must seek advice when they are uncertain about the ethics of any decision or course of action.

8 MAKING ETHICAL DECISIONS THE PLUS FILTER

Whenever you make a decision, ask yourself the following four questions. If you can answer yes to all four questions, your decision is probably ethical and compliant with the values, principles, rules and guidelines contained in the Code of Ethics.

If you cannot answer yes to all four questions, there may be an ethical issue related to your course of action.

Then, you must seek guidance.

Policy and procedures

Question 1 Do the conduct provisions in the Code of Ethics and other policies or procedures applicable to the situation permit the behaviour that I am considering?

Laws and regulations

Question 2 Do national laws and regulations permit the behaviour that I am considering?

Universal FirstRand values

Question 3 Do FirstRand's values and principles permit the behaviour that I am considering?

Self

Question 4 Do my personal values - my own sense of ethics —permit the behaviour that I am considering? If so, would I feel comfortable and not be embarrassed if the decision I took became public knowledge.

9 QUICK REFERENCE TO THE FIRSTRAND CODE OF ETHICS

The FirstRand code of ethics applies to all FirstRand employees at all levels of responsibility. You need to familiarise yourself with the code. The values and principles set out in the code should form the basis for all our decisions and actions.



CONTACT

FirstRand ethics line email
report@firstrandethicsoffice.com

FirstRand ethics line website
www.firstrandethicsoffice.com

Leading Light email
leadinglight@firstrand.co.za

Control Room email
compliancecontrolroom@rmb.co.za

FirstRand ethics line toll free numbers

South Africa
 0800 00 33 12

United Kingdom
 0808 238 75 00

Botswana
 0800 600 644 (Botswana Telecoms users)
 1144 (Orange users)
 71119711 (Mascom users)
 +27 11 929 3332 (call back)

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 544 315 491 (local)
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 000800 100 79 00

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 50800 (Airtel users)
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Consult the local Ethics Office, Risk Manager and Compliance Officer for local contact details not included above.