

## ACCESS BANK (GAMBIA) LIMITED ANTI-BRIBERY AND CORRUPTION POLICY

## Our core values and principles

Access Bank (Gambia) Limited does not allow any partner, supplier, sub-contractor, agent or any individual engaged by Access Bank (Gambia) Limited to behave in a corrupt manner while carrying out Access Bank (Gambia) Limited's work.

To help you identify cases of bribery and corruption, behaviour which amounts to corruption includes but is not limited to:

**Paying or Offering a Bribe**\_where a person improperly offers, gives or promises any form of material benefit or other advantage, whether in cash or in kind, to another to influence their conduct in any way.

**Receiving or Requesting a Bribe**\_where a person improperly requests, agrees to receive or accepts any form of material benefits or other advantage, whether in cash or in kind, which influences or is designed to influence the individual's conduct in any way.

Receiving or Paying a so-called "Grease" or "Facilitation "Payment\_where a person improperly receive something of value from another party, performing a service or the other action that they were required by their employment to do anyway.

**Nepotism or Patronage-** where a person improperly uses their employment to Favour or materially Favour friends, relatives or other associates in some way. for example, through the awarding of contracts or other materials advantages.

**Embezzlement**\_Where a person improperly uses funds, property, resources or other assets that belong to the organization or individual.

**Receiving So-called "KickBack" Payment-** where a person improperly receives a share of funds, a commission, materials benefit or other advantage from a supplier because of their involvement in a corrupt bid or tender process.

**Collusion-** where a person improperly colludes with others to circumvent, undermine, or otherwise ignore rules policies or guidance.

**Abuse of a Position of Trust-** where a person improperly uses their position within their organization to materially benefit themselves or any other party.



## Channels for raising concerns on bribery and corruption Internal Whistleblowing Channels

Mobile Line +220 2383716

Email gambiawhistleblower@accessbankGambiaLtd.com

Mobile Line +220 3642770

## **External Whistleblowing Channels**

Toll-Free Hotlines 0800TIP-OFFS(0800 847 6337)

Email <u>tip-offs@deloitte.com.ng</u>

Web portal Link https://tip-offs.deloittemanagedsolutions.com.ng/

Mobile App

Deloitte Tip-Offs anonymous available on the Google Play

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Store for Android and the App Store for Apple