

## OUR INTEGRITY COMMITMENT Against Fraud, Corruption & Bribery

Fraud, corruption and bribery are any **dishonest or unlawful acts—internal or external—** intended to obtain an **undue advantage** (financial or otherwise), influence decisions improperly, or evade legal/regulatory obligations through **deception, abuse of position, collusion, misrepresentation, or improper payments/favours**. This includes bribery and facilitation payments, kickbacks, falsified documents, theft, conflicts of interest, and any form of unethical inducement.

### OUR COMMITMENT

Guided by our internal policies and our values, **BANK OF AFRICA – RWANDA** adopts a **zero-tolerance** approach to fraud, corruption, and bribery. Because integrity is the foundation of everything we do, we commit to:

- **Prevent & protect:** Maintain strong systems, controls, and oversight to prevent, detect, and respond to integrity risks.
- **Act with integrity—always:** Require every staff member to act ethically, avoid conflicts of interest, and report suspicious behaviour.
- **No improper advantage—ever:** Prohibit bribery in all forms (direct/indirect; active/passive), including facilitation payments and undue favours—regardless of custom or circumstance.
- **Fair decisions only:** Ensure decisions (procurement, recruitment, lending, partnerships, service delivery) are based on **merit, fairness, and transparency**—never influence.
- **Swift consequences:** Take decisive action where misconduct is confirmed, including disciplinary measures and, where applicable, civil and criminal proceedings.
- **Stronger partnerships:** Work only with third parties who uphold ethical standards and terminate relationships where integrity is compromised.
- **Safe speaking up:** Provide secure whistleblowing/reporting channels and protect good-faith whistleblowers from retaliation.
- **Continuous awareness:** Build a culture of vigilance through ongoing training, communication, and leadership accountability.

### **Integrity protects trust. Trust protects our customers, our people, and our bank.**

Through continuous awareness, strong governance, and ethical leadership, we safeguard our customers, our employees, our shareholders, and our community.