



## UNITY BANK PLC WHISTLE BLOWING PROCEDURE

### What is Whistle-Blowing?

Whistle-blowing involves the reporting of incidents of misconduct involving or affecting an organization to enable the organization to take appropriate action. It is a window to obtain feedback on issues bordering on both corporate governance as well as reputational risk related issues escalated to the highest levels of the Bank.

An effective whistle-blowing programme is regarded as a key element of good corporate governance and good fraud risk management. A key feature of an effective whistle-blowing programme is the ability of whistle-blowers to report incidents anonymously and/or confidentially, if they so desire.

The Code of Corporate Governance for Banks in Nigeria Post Consolidation (**CBN Code No. 6.1.12**) requires Nigerian banks to implement whistle blowing procedure.

The Code of Corporate Governance specifically states that ***“Banks should establish ‘whistle blowing’ procedures that encourage (including by assurance of confidentiality) all stakeholders (staff, customers, suppliers, applicants etc) to report any unethical activity/breach of the corporate governance code using, among others, a special e-mail or hotline to both the bank and the CBN .***

### Why should we blow the whistle?

- *Silence is not always golden*
- *Silence may imply that we condone the misconduct*
- *Silence may imply that we are parties to the misconduct*
- *Failure to report may cast doubt on our integrity*
- *Failure to report may cast doubt on our loyalty to the organization*
- *We have a right and a duty to report*
- *“Swallowing the whistle” leads to unchecked fraud and misconduct*
- *Above all, unreported fraud or gross misconduct can result in loss of jobs and other benefits, which adversely affects everyone including us.*

### Some critical success factors of whistle blowing

- *Confidentiality and anonymity - All reports will be professionally handled.*
- *Users should avoid false and malicious allegations that cannot be substantiated.*
- *The Banking industry is known as one of the busiest service industry worldwide as such users should avoid frivolous calls.*

The Regulatory Compliance department in line with the Code of Corporate Governance will ensure effective creation of awareness among staff and other stakeholders to ensure the success of whistle blowing in Unity Bank Plc.

In compliance with this code Unity Bank PLC has established a **whistle blowing alert on our web site [www.unitybankng.com](http://www.unitybankng.com) and a special address made available at [info@unitybankng.com](mailto:info@unitybankng.com)**

where all stakeholders can access and provide any useful information /grievances on any issue that directly and/or indirectly affects them.

*In addition the following dedicated lines are also available for the same purpose:*

**CBN - 09-46239428, 09-46236403**

**Unity Bank Plc 09-4616701, 09-4616703, 09-4616719**

The Bank also has customer care initiative tagged I-Care Initiative. This initiative is to provide additional platform to attend to the complaints of our customers who might have been aggrieved due to service failure. Two platforms were created for this purpose, namely –

- *Customer satisfaction tracker - an electronic machine installed in Branches to ensure that customers' level of satisfaction is recorded by simply pressing some buttons that will capture his perception about service quality level in the Branch.*
- *Weekly reports are independently captured at the central location in a Unit situated at Strategy Department and compiled for all the locations where the machines are installed. Such reports form part of the performance measures for branch locations.*
- *Similarly, customers can send in their service delivery feedback through our website portal created for this purpose. The e-mail address is [we\\_care@unitybankng.com](mailto:we_care@unitybankng.com).*

**Clarity about types of reportable incidents:**

- *In line with our core value proposition Unity Bank Plc will welcome any information that will improve services to our valued customers.*
- *You have a right and duty to report any breach in Corporate Governance.*
- *Any information that will lead to the detection of fraud or misconduct.*
- *Any breach of procedure to laid down Regulatory or Bank policies.*

**Procedures / Process flow on Whistle Blowing Facility**

- *An informant within or outside the Bank logs on to the Website at [www.unitybankng.com](http://www.unitybankng.com) and clicks on the whistle blower to make a report to the Bank electronically.*
- *The designated staff that has been assigned access password review the reports and makes recommendation to the Executive Management on remedial action to be taken.*
- *Upon approval, if it is not an operational issue, Management approval is advised to the relevant Departments for immediate action.*
- *For issues that border on policy changes, the policy issue is referred to the relevant Department to enable a review of the existing policy.*
- *The Department reviews the policy as appropriate and recommends for policy amendment if considered necessary.*
- *Recommendation for policy amendment is made to the Executive Management (EXCO) for endorsement to the Board.*
- *Upon EXCO and Board approval, the relevant Department is advised for immediately implementation.*

**Best Regards,**

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**Head, Regulatory Compliance Dept**

Ado Y Wanka  
**GED, Risk Management & Controls**