

## Stanbic Group- Policy

Policy name:	Stanbic Group Conflicts of Interest Policy
Abstract:	The Conflicts of Interest Policy is designed to provide guidance around identification, disclosing, management of conflict of interest and sets out roles and responsibilities. This policy seeks to align to industry standards, with a view to mitigating conduct risk as well as managing any actual, potential, or perceived conflicts of interest.
Level:	Stanbic Group
Classification:	Internal use only
Owner:	Head of Compliance
Approved by:	Board
Approval date:	November 2025
Effective date:	November 2025
Next Review date:	Nov 2027
Version number:	
Risk type:	Compliance
Key words:	Conflicts, interest, code of ethics, conduct, potential conflicts, independence, inappropriate influence, disclosure, market abuse, declaration.
Document number:	<b>COMPL1.BC2</b>

### **Classification**

*This document has been issued strictly for internal business purposes of Stanbic Holdings Plc, its subsidiaries and their subsidiaries (Stanbic **group**). . Dissemination hereof by any means outside the Stanbic Group is prohibited, unless prior written approval is obtained from the policy owner.*

### **Copyright**

*All rights, including those in copyright in the content of this document, are owned by Stanbic Group*

### **Table of Contents**

---

1 Purpose and overview ..... 3

2 Policy statement ..... 3

3 Applicability..... 4

4 Minimum requirements to comply with this policy ..... 4

5 Roles and Responsibilities ..... 8

6 Exceptions ..... 10

7 Related governance documents..... 10

8 Disciplinary Action ..... 11

9 Definitions..... 11

10 Policy Administration ..... 14

11 Revision History..... 14

12 Annexure A..... 17

## 1 Purpose and overview

- 1.1 The business of the Stanbic Group is built on trust and integrity as perceived by our stakeholders, clients, shareholders, and regulators.
- 1.2 An important element of trust and integrity is ensuring that the Stanbic Group conducts its business in accordance with the values and Code of Ethics and Conduct that the group has adopted, in compliance with applicable laws, rules and standards.
- 1.3 The Conflicts of Interest Policy (**policy**) is designed to comply with applicable statutory and regulatory obligations across the Stanbic Group , ensuring that:
  - 1.3.1 the Stanbic Group maintains and operates effective organisational and administrative arrangements with a view to taking all reasonable steps to prevent conflicts of interest from constituting or giving rise to a material risk of damage to the interests of clients; and
  - 1.3.2 where arrangements are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of clients will be prevented, the Stanbic Group will make appropriate and prior disclosure to the client(s) about the nature and source of such conflicts of interest (subject to adhering to any applicable confidentiality constraints), disclose the steps taken to mitigate such conflicts of interest seek the client(s) consent or alternatively decline to act.
- 1.4 The Stanbic Group requires all employees, consultants, contractors, suppliers, other associated persons and other third parties to always act honestly and with integrity and to manage fairly all conflicts of interest.
- 1.5 This policy should be read together with any associated local legal entity procedures (**procedures**).

## 2 Policy statement

The policy is designed to ensure compliance with regulatory requirements and to align business practices with industry standards and the Code of Ethics and Conduct. It addresses the management of actual, potential, or perceived conflicts of interest. The Stanbic Group stance on workplace relationships is also outlined in this policy. All employees are required to familiarise themselves with the policy, procedures, and the broader conflicts of interest framework.

### 3 Applicability

- 3.1 This policy applies to all employees of the Stanbic Group regardless of location or business unit.
- 3.2 This policy reflects the Stanbic Group minimum requirements, and these may not be deleted by a business unit or business area.
- 3.3 The minimum requirements contained in this policy may be supplemented or customised by a business policy or procedure to provide for additional requirements. Any proposed additional requirements to this policy must be discussed with, and, if agreed to, approved in writing by the Head of Compliance compliance policy owner.
- 3.4 All approvals provided in writing by the Head of Compliance compliance policy owner together with the customised policy must be submitted to the relevant governance committee for approval.

### 4 Minimum requirements to comply with this policy

- 4.1 Identifying conflicts of interest
- The Stanbic Group offers a broad range of services to its clients. Conflicts of interest are, therefore, inherent in the industry and the business model. Broadly speaking, a conflict of interest arises in any activity or transaction to which any Stanbic Group entity is a party or for which any entity provides services and where:
- 4.1.1 the interests of the Stanbic Group and a client of the Stanbic Group either directly conflict or are incompatible with one another Stanbic Group (/client conflict);
- 4.1.2 the personal interests of an employee or other agent of the Stanbic Group conflict or are incompatible with those of a client of the Stanbic Group (employee/client conflict);
- 4.1.3 the personal interests of an employee or other agent of the Stanbic Group conflict or are incompatible with those of the Stanbic Group (employee/group conflict);
- 4.1.4 the interests of two or more clients of the Stanbic Group either directly conflict or are incompatible with one another (client/client conflict); and
- 4.1.5 in terms of the Standard Bank Group (Group) structure and reporting lines, Stanbic Group which the is a subsidiary of, information flows between the various entities, non-executive directors, its parent company, and other subsidiaries and can lead to the emergence of

similar conflicts of interest (for example, sharing of potential proprietary, confidential or otherwise sensitive information from different entities), (group conflict).

## 4.2 Conflicts of interest

In identifying the types of conflicts of interest that arise or may arise, the Stanbic Group must consider, among other things, whether it, or a relevant person, directly or indirectly associated by control or ownership:

- 4.2.1 is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- 4.2.2 influences the appointment of service providers due to personal relationships;
- 4.2.3 may exert influence over the selection of service providers due to personal relationships;
- 4.2.4 acts on behalf of the client in a manner which is distinct from the client's interest in that outcome;
- 4.2.5 carries on the same business as the client;
- 4.2.6 engages in activities that involve conducting business in competition with the Stanbic Group or undertaking roles that is similar to their job responsibilities within the organisation;
- 4.2.7 receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service, or
- 4.2.8 has a financial or other incentive to favour the interest of a client or group of clients over the interests of another client.

4.3 It is not possible to set out in this policy all the potential conflicts of interest that may arise. As a result, it is vital that employees are always alert to potential conflicts. Employee awareness and communication with senior management, the Group Compliance Control Room and Compliance Officers are key conflicts management tools.

4.4 Each employee is therefore responsible for reporting promptly to the relevant Head of Compliance function who will report to the Group Compliance Control Room any concerns as to how a potential interest could be perceived or how the interests of the Stanbic Group or clients may be affected by a proposed transaction.

## 4.5 Managing conflicts of interest

Having identified a potential conflict of interest, the Stanbic Group must operate effective arrangements and procedures with a view to taking all reasonable steps to prevent conflicts of interest from adversely affecting the interests of its clients. Owing to the nature of certain product offerings/transactions, prior conflicts clearance needs to be obtained. The Group Compliance Control Room currently manages the conflicts clearance process on behalf of Stanbic Group Compliance and heads of business areas and units assist the Group Compliance Control Room with this process. In formulating measures and procedures to manage such risks, the Stanbic Group has implemented controls to ensure that employees engaged in different business activities carry on those activities at a level of independence that is appropriate given the size and nature of such activities, to prevent the risk of damage to the interests of the Stanbic Group and its clients, which may otherwise ensue. The following factors are considered:

- 4.5.1 Effective procedures to prevent or control the exchange of information between employees engaging in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients (for example, information barriers);
- 4.5.2 The separate supervision of an employee whose principal function involves carrying out activities on behalf of, or providing services to, clients whose interests may conflict (for example, favouring one client over the other in the provision of the same service), or who otherwise represent different interests that may conflict, including those of the Stanbic Group ;
- 4.5.3 The removal of any direct link between the remuneration of employees principally engaged in one activity and the remuneration of, or revenues generated by, other employees principally engaged in another activity where a conflict of interest may arise in relation to those activities;
- 4.5.4 Measures to prevent or limit an employee from exercising inappropriate influence over the way in which another employee carries out investment or ancillary services or activities (that is, including information barriers and other management structures); and
- 4.5.5 Measures to prevent or control the simultaneous or sequential involvement of an employee in separate investment or ancillary services or activities where such involvement may impair the proper management of conflicts of interest.
- 4.6 Where the Stanbic Group is unable to manage a particular conflict of interest so that the risk of damage to the interests of a client is prevented, it may be necessary to disclose (subject to any confidentiality constraints) the nature of the conflict prior to proceeding to do business for, or with, the client. Such approach serves to ensure that the client can

make an informed decision as to whether to proceed with its activities with the Stanbic Group . Note, however, that this does not exempt the Stanbic Group from the requirement to maintain and operate effective organisational and administrative arrangements in relation to the conflict of interest. Over-reliance on disclosure without adequately considering how conflicts of interest may be appropriately managed is not acceptable.

4.6.1 There may be situations where a conflict of interest can be managed through disclosure and by seeking the consent of the client. In such instances it is imperative that the Stanbic Group adheres to any confidentiality constraints or remains cognisant of any confidentiality constraints which may prohibit such disclosure.

4.7 Even with appropriate management techniques, there may be some situations where it may not be possible, or appropriate, for the Stanbic Group to act on behalf of a client. In such situations, the Stanbic Group must decline to act.

4.8 Policy statement on relationships in the workplace (**Annexure A**)

Relationships between employees in the workplace, more specifically family and intimate relationships, may give rise to conflicts of interest. The statement on relationships in the workplace (as set out annexure A to this policy) serves to outline the principles and requirements that need to be adhered to in order to ensure that the risk of such relationships giving rise to a conflict of interest is adequately managed. Annexure A to the policy has been drafted by the People and Culture Department.

4.9 Interpretation

If any aspect of this policy can be interpreted as having more than one meaning, then the meaning that best promotes the purpose of this policy shall prevail as decided by the policy owner.

4.10 Non-compliance

Non-compliance with this policy must be reported to line management and the Compliance function.

4.11 Escalation

In instances where there is a dispute regarding the provisions of this policy, the dispute must be escalated to the Stanbic Group Head of Compliance, who will escalate to the Group Head: Compliance Control Room for a decision and thereafter escalated to the

Regional Head and Africa Regions and Offshore Chief Compliance Officer whose decision is final.

#### 4.12 Recordkeeping

4.12.1 All records listed below must be kept for at least seven (7) years or in accordance with the time periods prescribed for recordkeeping by jurisdictional regulatory requirements, whichever is later:

4.12.1.1 Records confirming the written approval received from the Stanbic Group compliance policy owner of any additional requirements to a customised policy must be maintained by the relevant country, business area or business unit.

4.12.1.2 Records relating to conflicts of interest and actual or potential non-compliance with this policy must be maintained by the relevant business unit.

## 5 Roles and Responsibilities

### 5.1 Executive and line management:

5.1.1 must institute and maintain measures and controls to ensure adherence and embedment of this policy;

5.1.2 must ensure that compliance with this policy and any associated procedures is enforced;

5.1.3 must ensure that all employees are aware of this policy and the need for compliance with this policy and any associated procedures;

5.1.4 must report any non-compliance with this policy to the Head of Compliance function. In the case of queries, the relevant Compliance Officer for the area should be engaged, as appropriate;

5.1.5 is responsible and accountable for the implementation of the requirements of this policy including the understanding of related conflicts and their impact; and

5.1.6 who become aware of an actual, potential, or perceived conflict of interest must ensure that it is appropriately managed in accordance with this policy. If a manager is uncertain about how to address the conflict, they must seek guidance from their Compliance function.

### 5.2 Compliance must:

5.2.1 review, update, maintain and monitor adherence to this policy and related procedures;

- 5.2.2 raise awareness in terms of this policy and related procedures;
  - 5.2.3 advise employees, line managers and business unit heads, where necessary;
  - 5.2.4 provide training, and guidance in respect of this policy to their business areas; and
  - 5.2.5 report non-compliance of this policy and any other procedures to the relevant governance committees
- 5.3 **Group Compliance Control Room must:**
- 5.3.1 review, update and maintain the Group policy;
  - 5.3.2 review and clear all relevant transactions or projects with a view to identifying any actual potential or perceived conflicts of interest at the earlier of the group being instructed on a matter or the pitch or proposal stage. Employees must not commit to any client and third party on such a transaction or project until conflicts clearance is received from the Compliance Control Room; and
  - 5.3.3 where appropriate escalate any conflicts of interest to the respective Compliance functions to obtain agreement on conflicts of interest resolution.
- 5.4 **Employees must:**
- 5.4.1 familiarise themselves with and adhere to this policy;
  - 5.4.2 be alert to actual, potential and perceived conflicts of interest and alert the heads of the relevant business unit and the Head of Compliance, who will alert the Group Compliance Control Room accordingly;
  - 5.4.3 assess and carefully consider any situation where an actual, perceived, or potential conflict of interest may arise, and declare it accordingly;
  - 5.4.4 comply with the policy and any associated procedures;
  - 5.4.5 notify the Compliance function for the area of any outside business interests, (including for any related party) related query or transaction / project/deal they may be working on;
  - 5.4.6 report non-compliance, including perceived or potential non-compliance, of this policy and any associated procedures to the Compliance function; and

5.4.7 if an employee is uncertain about the presence of such a conflict, they should seek guidance from their Compliance Officer/Function.

5.5 **People and Culture must (specifically, in relation to Annexure A to the policy):**

5.5.1 review Annexure A;

5.5.2 monitor adherence to Annexure A;

5.5.3 raise awareness in terms of Annexure A;

5.5.4 advise employees, line managers and business unit heads, where necessary; and

5.5.5 provide training and guidance in respect of Annexure A.

## 6 Exceptions

Should a business unit or business area be unable to comply with any provision of this policy, the Head of Compliance must bring this to the attention of the group policy owner in writing for discussion as to whether an exception must be applied for.

## 7 Related governance documents

### *Policies*

Policy name
Code of Ethics and Conduct.
Anti-Bribery and Corruption Policy.
Watch, Discreet and Restricted List Policy.
Personal Account Trading Policy.
Research Policy
Outside Business Interests Policy.
Gifts and Entertainment Policy.
Information Barriers and Need to Know Information Policy.
Complaints Management Policy.
Prevention of the Facilitation of Tax Evasion Policy.
Whistle-blowing Policy.
.


### Procedures

#### Procedure name

### Other

#### Document name

Stanbic Group Code of Ethics and Conduct

## 8 Disciplinary Action

- 8.1 Failure to comply with this policy may lead to disciplinary action and possible dismissal.
- 8.2 In addition, an employee may incur personal liability for civil or criminal penalties, which includes fines, payment of damages or imprisonment.

### Relevant In-country Regulatory and Legislative Requirements:

- a) The Banking Act (CAP 488)
- b) Central Bank of Kenya (CBK) Prudential Guidelines, 2013
- c) Central Bank of Kenya (CBK) Risk Management Guidelines, 2013
- d) Capital Markets Act, 2016
- e) The Kenya Foreign Exchange Code (FX Code), 2023
- f) Competition Act (2010)
- g) Capital Markets (Whistleblower) Regulations, 2022
- h) The Capital Markets (Corporate Governance) (Market Intermediaries) Regulations, 2011
- i) The Capital Markets (Public Offers, Listings and Disclosures) Regulations, 2023

Any other applicable local laws and regulations

## 9 Definitions

### Information Barriers

Information barriers, are arrangements (often, but not necessarily, physical barriers) which prevent the inappropriate flow of Material Non Public Information (**MNPI**) and Need to Know

Information held or acquired by the Stanbic Group in the course of carrying on one part of its business from being disclosed to, or used for the benefit of the or persons for whom the Stanbic Group acts, in the course of carrying on another part of its business, in circumstances where there may be a breach of duty or conflict of interest.

client

A person or persons or institution that holds or maintains a relationship with the Stanbic Group or expresses or indicates an intention to do so (includes a consultant, broker, vendor, or other service providers).

Group Compliance Control Room

A Compliance function responsible for providing Investment Banking and other business units within the group with guidance and support on a range of conflicts of interest matters. The Compliance Control Room's main function is to review and clear prospective and new transactions, manage wall crossings, maintain watch, discreet and restricted lists, and guard the integrity of the group's Information Barriers.

employees

- All employees employed on indefinite term contracts of employment, whether on a full-time or part-time basis.
- All employees employed on a fixed-term contract of employment/limited duration contract, whether on a full-time or part-time basis.
- Any person deemed to be an employee of the group by virtue of the operation of law in the jurisdiction in which they are employed.
- Independent Contractors, Independent Service Providers and persons employed by other employers who render services to the Stanbic Group , are excluded.

Material Non-Public Information (MNPI)

Is information of a specific or precise nature about or relating to one or more companies or one or more of its relevant assets that is not generally available, has not been made public and which, if it were to be made publicly available, is likely to have a material effect on the price or value of the relevant assets or would be likely to be relevant to a reasonable investor's decision to act in relation to such relevant assets. MNPI is also referred to as

“inside information” or “price sensitive information”. Note: MNPI as currently defined is not restricted solely to listed entities.

#### relevant asset/s

Any financial instrument listed or admitted to trading (or for which a request for listing or admission to trading has been made) on a Relevant Trading Venue or whose price or value depends on or has an effect on the price or value of a relevant asset listed or admitted to trading (or for which a request for listing or admission to trading has been made) on a Relevant Trading Venue. Relevant assets accordingly include but are not limited to:

1. equities;
2. money market instruments, Currency (foreign exchange), bonds (including government bonds – in local or foreign currency), credit products, other forms of securitised debt and crypto currencies;
3. warrants related to relevant assets;
4. units in funds (including index/mutual and/or exchange-traded funds), property funds and investment trusts;
5. depositary receipts related to all relevant assets;
6. base and precious metals or other commodities
7. options, futures, forwards, FX and interest rate swaps, forward rate agreements, contracts for difference, spread bets and any other derivative contracts or similar instruments relating to the foregoing items 1 to 6 or to credit, interest rates or yields, commodities (all classes of commodities included), emission allowances, foreign exchange or any other classified derivatives instruments, financial indices or financial measures which may be settled physically or in cash; or
8. options, futures, futures, FX and interest rate swaps, forward rate agreements, contracts for difference, spread bets and any other derivative contracts or similar instruments relating to commodities which may be settled in cash (other than by reason of default or other termination event) or physically (if traded on a Relevant Trading Venue only or if not traded for a commercial purpose.

#### Relevant Trading Venue

Any venue, system, or process (physical or electronic) that is:

1. a stock exchange for listing and/or trading of relevant assets;

2. a multilateral system operated by an investment firm or a relevant market operator which brings together multiple third-party buying and selling interests in relevant assets; or
3. a multilateral system in which multiple third-party buying and selling interests in relevant assets can interact in such system in a way that results in a contract for such relevant assets in accordance with such system's rules,

provided that in the case of (2) and (3) above any issuer of the relevant asset in question has approved trading of their relevant assets on such venue, process or system or have requested admission to trading of their relevant assets on the same.

## 10 Policy Administration

### Contact Person:

Name	Mary Runana specific policy owner
Title	Head of Compliance specific policy owner
Department	Compliance
Telephone	+254 (0)20 326 8270 amend as appropriate
Email	RunanaM@stanbic.com amend as appropriate
Document Number	COMPL1.BC2

## 11 Revision History

Version no.	Purpose of revision: <i>[Regulatory development / Bi-annual review]</i>	Review date:	Effective date:	Summary of key revision points:
V1	Regulatory requirement	2015	2013	
V2	Biennial review	2017	2015	

V2.1	Inclusion of the Policy Statement on Relationships in the Workplace – Annexure A	2018	2018	
V3	Biennial review	2021	2019	
V4	Biennial review	2023	2021	
V5	Update		2022	Removal of clause assigning responsibility to the Board
V6	Biennial review			Alignment of record keeping requirement with group wording. Include additional related policies. Alignment of relevant assets to market abuse policy. Remove People and Culture as policy statement

				owner from Annexure A
V7	Update			Update to applicability section to remove the exclusion of Liberty.
V8	Biennial review	2025	2027	Revised Group Compliance Policy template, incorporating a policy statement and exceptions, clarifying conflict of interest, updating recordkeeping, roles and responsibilities, related governance documents, key definitions, and Annexure A

Reviewed and approved by the Board on 19<sup>th</sup> November 2025

Chairman:   
[Joseph Muganda \(Dec 10, 2025 10:50:50 GMT+3\)](#)

Company Secretary:   
[Nancy Kiruki \(Dec 5, 2025 12:56:06 GMT+3\)](#)

## 12 Annexure A

### **Statement on Relationships in the Workplace**

While the Stanbic Group does not prohibit relationships in the workplace, it is important that the Stanbic Group has certain limitations and rules in place to ensure that actual, potential, and perceived conflicts of interest do not arise. Employee should disclose any actual, potential, and perceived conflicts in writing to their line manager.

### **Family relationships**

As a large employer, the Group and Stanbic Group does have members from the same family who are employed within the Group and Stanbic Group . It should however be noted that the employment of family members in situations where one family member has direct or indirect influence over the other's conditions of employment (e.g. salary, hours worked, shifts, promotion etc.) is inappropriate. For the purpose of this statement, family members are defined as spouse, domestic partner, daughter, son, parent, grandparent, grandchild, sister, brother, mother-in-law, or father-in-law, aunts, uncles, cousins, or relatives by marriage.

In any instance when employees are unsure about a potential conflict, they should fully disclose the circumstances in writing to their line manager and the relevant Compliance Function for advice. The declaration must be kept on the employee's personal file.

Under no circumstance may one family member play any role (whatsoever) in the recruitment and appointment process of another family member. Both the applicant for the role and the individual already working for the Group and/or Stanbic Group should disclose their relationship at the point in time when the application for employment is submitted.

If one family member has influence over another family member's terms and conditions of employment, the following should occur:

- In collaboration with the line manager of the more senior employee, the employees involved will be provided thirty days to make a decision regarding a change. Options include, but are not limited to:
  - one employee applying to transfer to another area; or,
  - revising the reporting structure in the department to ensure that one employee no longer has direct or indirect influence over the other employee's terms and conditions of employment.
- If a decision is not reached by the end of the thirty-day period, the executive responsible for the area will be required to adequately resolve the situation.

If the Group and/or Stanbic Group becomes aware of a family relationship between employees which has not been declared, and / or where influence has been exercised, the Group and/or may take disciplinary action against one or both employees.

### **Personal/Intimate relationships**

Employees are encouraged to develop professional relationships in the workplace and to socialise in a professional manner at social events, provided that these relationships do not interfere with the work performance of either individual or with the effective functioning of the workplace.

Employees who engage in personal relationships (including but not limited to, close personal friendships, community, romantic and sexual relationships) should be aware of their professional responsibilities and are furthermore responsible for ensuring that their relationships do not give rise to concerns regarding favouritism, bias, ethics, and conflict of interest. In cases of doubt, advice and counsel should be sought from the relevant People and Culture Business Partner (**PCBP**), line manager or Employee Relations.

No employee who is a party to a personal relationship may play any role whatsoever in the recruitment and appointment process of the other party.

Personal relationships between employees where one individual has either direct or indirect influence or control over the other's conditions of employment are inappropriate. These relationships, even if consensual, may ultimately give rise to conflicts of interest and / or result in difficulties in the workplace. If such a relationship currently exists or develops, it must be disclosed immediately:

- The employee who has influence or control over the other's conditions of employment has an obligation to disclose his/her relationship in writing to the PCBP and his/her line manager.
- The other employee likewise has an obligation to disclose the relationship to the PCBP and his/her line manager in writing (assuming the relationship is not with the line manager – if it is, the disclosure must be made one level up to the line manager's manager).

The written declarations must be kept in the employee file or in such relevant system as the organization may determine from time to time.

In collaboration with the line manager of the more senior employee, the employees involved will be provided thirty days to make a decision regarding a change. Options include, but are not limited to:

- one employee applying to transfer to another area; or
- revising the reporting structure in the department to ensure that one employee no longer has direct influence over the other employee's conditions of employment.

If the Group and/or Stanbic Group becomes aware of a personal relationship between employees which has not been declared, and / or where influence has been exercised, the Group and/or Stanbic Group may take disciplinary action against one or both employees.

### **General**

If a relationship has not been declared and is deemed to be inappropriate (when considered within the context of this statement) the area head, after consultation with the PCBP, will take appropriate action which could include disciplinary action.

If an employee, whether involved in the relationship, believes they have been, or are being, adversely affected by the fact that the relationship exists, they are encouraged to contact their PCBP.

When relationships develop into situations that may be viewed as harassment or sexual harassment, employees should refer to the Stanbic Group Harassment Policy and/or the Stanbic

Group Sexual Harassment Policy, which outlines the various avenues available for reporting such instances. They may also approach their PCBP, who will explain the policy and procedures to them.

## Statement Administration

<b>Name</b>	Mary Runana
<b>Title</b>	Head of Compliance
<b>Department</b>	Compliance
<b>Telephone</b>	+254 (0)20 326 8270
<b>Email</b>	RunanaM@stanbic.com