



WHISTLE-BLOWING POLICY & PROCEDURE

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Whistle Blowing Policy

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This document presents the policy and mechanism for reporting any illegal or unethical behavior in the Bank in line with leading practices, and in compliance with Central Bank of Nigeria (CBN) guidelines on whistle-blowing.

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Ownership and Frequency of Review

This policy remains the property of the Development Bank of Nigeria Plc. However, its custody and management towards ensuring that it remains a living document rests with the Head, Internal Audit, Development Bank of Nigeria Plc.

This policy document and procedure manual shall be subject to review every two (2) years or as may be deemed necessary. All suggestions for review and or amendments shall be forwarded to the Head, Internal Audit, Development Bank of Nigeria Plc. for necessary action including obtaining Management/Board approvals of the amended policy.

This document shall be hosted in the official website of the Development Bank of Nigeria Plc; the Management of the Bank shall ensure strict compliance with this Policy.

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1.0 Introduction

Development Bank of Nigeria Plc, “the Bank”, in ensuring high ethical standard in all its business activities had established a code of ethics, which set out the standard of conduct expected in the Bank. All staff are expected to comply with these standards in the discharge of their duties.

This Whistle-blowing Policy and Procedure provides a channel for the Bank’s employees and other relevant stakeholders to raise concerns about workplace malpractices, in a confidential manner. The policy also highlights the procedure for investigating alleged malpractices; which will help to ensure that definite steps for proper investigation of the alleged malpractices are taken to deal with such reported concerns in a manner consistent with the Bank’s policies and procedures and relevant regulations.

Whistle-blowing in this context is the act of reporting perceived unethical conduct of employees, management, directors, and other stakeholders by an employee or other persons to appropriate authorities.

This policy and procedure manual outline the Bank’s policy on whistle-blowing and the procedure for investigating and dealing with all reported cases of illegal and unethical conduct and any other misconduct in the Bank. This policy follows the requirements of **Section 5.3 Whistle Blowing** of the Central Bank of Nigeria (CBN) “Code of Corporate Governance for Other Financial Institutions in Nigeria” and **Principle 19 Whistle Blowing** of the Financial Reporting Council of Nigeria (FRCN) “Nigerian Code of Corporate Governance 2018”

Definition of Terms

The following terminologies used in this document have been defined and described to serve as a guide for users of the document.

Breach: A breach is a suspicion based on reasonable grounds with regard to the Bank and in connection with:

- an (imminent) criminal offence;
- an (imminent) violation of laws and regulations;
- an (imminent) theft/ or collusion
- an (imminent) intentional provision of incorrect information to public bodies;
- a violation of DBN’s policy, principles or other bank policies and guidelines;
- any concerns regarding questionable accounting, internal accounting controls or auditing matters and procedures; or
- an (imminent) intentional suppression, destruction or manipulation of information regarding those facts;
- an (imminent) sexual harassment either from male or female employee, sexual discrimination, victimization, physical or verbal harassment or assault

Complaint: Is an allegation or concern that is subject to investigation by the appropriate authority.

Complainant: Any party who conveys a concern, allegation or information indicating fraud, corruption or misconduct.

Deloitte TOA: Deloitte Tip-Offs Anonymous

Good Faith: This arises when a report or concern is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

Detriment: Victimization or reprisal of a whistle-blower which can take any or a combination of the following forms; dismissal, termination, redundancy, undue influence, duress, withholding of benefit and/or entitlements and any other act that has negative impact on the whistle-blower.

Investigation: Involves a process designed to gather and analyze information to determine whether misconduct has occurred and if so, the party or parties responsible.

Misconduct: Involves failure by a staff member or other relevant stakeholder to observe the rules of conduct or standards of behavior set by an organization. The common forms of misconduct, also referred to as offences, misdemeanours or transgressions are stated below, these are not meant to be exhaustive:

- Theft;
- Unauthorized possession of company goods;
- Fraud;
- Bribery;
- Intimidation;
- Assault;
- Willful or negligent damage of company property;
- Deserting post or work station without permission;
- Unauthorized possession or consumption of liquor or drugs while on duty;
- Willful poor performance;
- Sabotage; and
- Sexual harassment.

Stakeholder: A stakeholder is a party that has an interest in a company and can either affect or be affected by the business. Stakeholders include:

- Employees
- Representatives/Agents
- Managers

- Directors
- Consultants
- Vendors
- Regulators
- Investors
- Customers
- Suppliers

Suspect: A person who is alleged to have committed a misconduct and subject of investigation.

The Bank: Development Bank of Nigeria Plc

Whistle-blowing: Involves reporting an observed/perceived unethical misconduct of employees, management, directors and other stakeholders in an institution by an employee or other person to appropriate authority. It is an early warning system that enables an organization to find out when something is going wrong in time to take necessary corrective action. It's a valuable tool for managing reputational risk.

Whistle-blower: Is any person(s) either internal or external to an organization comprising of; employee, management, directors, depositors, service providers, creditors and other stakeholders who reports any form of unethical behavior or dishonesty to the appropriate authority either with the organization or to the appropriate security agency.

2.0 Objective

This policy and procedure manual is intended to encourage staff and other stakeholders to anonymously report perceived unethical or illegal conduct of employees, management, directors and other stakeholders in the Bank to an independent and designated party in a confidential manner without any fear of harassment, intimidation, victimization or reprisal of anyone for raising concern(s) under this policy. Specific objectives of the policy are to:

- a. Facilitate the identification of all improper, unethical or inappropriate behavior at all levels in the Bank;
- b. Provide an enabling environment for all stakeholders in the Bank to disclose information about an event, or omission that they reasonably believe could impact negatively on the well-being of the Bank or any of its stakeholders and the general public;
- c. Encourage employees and other stakeholders to make reports without any fear of retaliation, victimization or reprisal; so that the observations/complaints can be addressed dispassionately and appropriately;

- d. Ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve improper, unethical or inappropriate conduct within the Bank;
- e. Help promote and develop a culture of openness, accountability and integrity;
- f. Provide clear procedures for reporting and handling such concern(s);
- g. Proactively prevent and deter misconduct which could impact the financial performance and damage the Bank's reputation; and
- h. Provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form.

3.0 Scope

This policy and procedure manual is designed to enable employees and other stakeholders to report any perceived act of impropriety which should not be based on mere speculation, rumors and gossips but on knowledge of facts. Reportable misconducts covered under this policy include:

- All forms of financial malpractices or impropriety such as fraud, corruption, bribery and theft;
- Failure to comply with legal obligations, statutes, and regulatory directives;
- Actions detrimental to Health and Safety or the work environment;
- Any form of criminal activity;
- Improper conduct or unethical behavior that undermines universal and core ethical values such as integrity, respect, honesty, accountability and fairness;
- All forms of corporate governance breaches;
- Connected transactions not disclosed or reported in line with regulations;
- Insider abuse;
- Non-disclosure of interests;
- Miscarriage of justice;
- Sexual or physical abuse of staff, customers, prospective staff, service providers and other relevant stakeholders;
- Infractions and contraventions under the Drug and Alcohol Policy and
- Attempts to conceal any of the above listed acts.

The above listed reportable misconducts or concerns are not exhaustive. Judgment and discretion are required to determine misconduct that should be reported under this policy. The general guide in identifying reportable misconduct is to report concerns which are repugnant to the interests of the Bank and the public.

This policy covers the operations of the Development Bank of Nigeria Plc. This is without prejudice to the requirements of the Federal Government Whistle-blower policy, and other regulatory guidelines on whistle-blowing which may be issued from time to time.

Finally, this policy does not cover individual staff grievances and other employee related matters already covered in the staff hand-books of the Bank.

4.0 Board and Management Commitment

The Board and Management are aware that a robust internal mechanism for employees and other relevant stakeholders to disclose workplace malpractices without fear of reprisal shows that employees take their responsibilities seriously and helps to avoid the negative publicity that often accompanies disclosures to external parties.

Hence the Board of Directors and Management are committed to promoting a culture of openness, accountability and integrity, and will not tolerate any harassment, victimization or discrimination of the whistle-blower provided such disclosure is made in good faith with reasonable belief that what is being reported is fact.

5.0 Policy Statement

The Development Bank of Nigeria Plc. is committed to the highest standards of openness, probity, accountability and high ethical behavior by helping to foster and maintain an environment where employees and other relevant stakeholders can act appropriately, without fear of reprisal. To maintain these standards, the Bank encourages employees and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the Bank, to come forward and report them through appropriate channels (in certain cases on a confidential basis) without fear of retribution or unfair treatment.

The Bank conducts its operations on the principles of fairness, honesty, openness, decency, integrity and respect. It is the intention of this policy to encourage employees and other relevant stakeholders to report and disclose improper or illegal practices or activities. The Bank is committed to investigate promptly any reported misconduct and to protect those who come forward to report such activities. The Bank further assures that all reports shall be treated in strict confidence.

The Bank's internal control procedures are intended to detect and prevent or deter improper activities. In practice, the best systems of controls may not provide absolute safeguards against irregularities.

A Whistle-blower's report will be handled with sensitivity, discretion and confidentiality while the Bank will protect 'Whistle-blowers' against all forms of victimization, retaliation, molestation, discrimination and harassment.

This policy is intended to provide a guide for the investigation and the taking of appropriate action against any reported misconduct or concern.

6.0 Roles and Responsibilities

The following are the roles and responsibilities of key parties in the whistle-blowing process:

S/N	Responsible Officers	Responsibilities
1	Whistle-blower	Whistle-blowers are expected to act in good faith and should refrain from making false accusations when reporting their concern(s) and provide further evidence at his/her disposal to aid investigation of the issues reported.
2	Suspects	A Suspect has a duty to cooperate with investigators during the period of investigation including provision of relevant information, documents or other materials as may be required by the investigator (Appointed External Investigator).
3	Investigator/ (Appointed External Investigator) and Head Internal Audit.	<p>The Head Internal Audit is expected to work with the External consultant to ensure proper investigation of all reported concerns.</p> <p>The Investigator is expected to handle all matters with high professionalism, confidentially and promptly. He/ she shall be independent and unbiased in carrying out investigation.</p> <p>The Investigator has the responsibility of acknowledging all concern(s) reported within 24 hours of receipt and reporting on the progress of investigation to the whistle-blower.</p> <p>The Head, Internal Audit shall endeavor to resolve all concerns within four weeks and report on the progress of the investigation to the whistle-blower as required.</p> <p>The Investigator shall submit a quarterly report to the Chairperson of the Board Audit & Compliance committee</p>

		<p>through the Head Internal Audit, which contains a summary of all cases reported and the result of the investigation.</p> <p>The Investigator shall refrain from discussing or disclosing matters under investigation referred to him.</p>
4	Head of Human Resources	The Head of Human resources of DBN shall implement the report of investigation that relates to the DBN's employees in line with the laid down disciplinary procedure as contained in the staff hand book.
5	Board Audit and Compliance Committee	The Board Audit and Compliance Committee through the Company Secretary shall make available to all Committee members quarterly reports submitted by the Investigator on whistle blowing and treat all whistle-blowing concern(s) brought to the attention of the Committee with dispatch.
6	Head, Internal Audit	Review and update the whistle-blowing policy and procedure and obtain Board approval therein.

7.0 Whistle-Blowing Procedure

The whistle-blowing procedure involves steps that should be taken by the whistle-blower in reporting a misconduct, and steps required for the investigation of the reported misconduct. The following procedures shall guide the Bank's whistle-blowing process:

7.1 Internal Whistle-Blowing Procedure

Internal whistle-blowing involves staff members raising concerns about unethical conduct in the Bank. The following procedure shall be adopted for internal whistle-blowing:

	Steps	Action
I	Step One Raising concern(s) by whistle-Blower	<p>An internal whistle-blower may raise a concern through any of the following media (this can be done either by declaration or in confidence/ anonymously):</p> <ul style="list-style-type: none"> ▪ Formal letter to the MD/CEO, Development Bank of Nigeria Plc. or the Head, Internal Audit, Development Bank of Nigeria Plc. ▪ Dedicated phone number (091-307-20890). ▪ Dedicated email address: whistleblow@devbankng.com <p>The whistleblowing policy can be accessed via DBN website: www.devbankng.com/policies.</p> <p>Where the concern is received by staff other than the MD/CEO or the Head, Internal Audit, the recipient of such concerns shall be required to;</p>

		<ul style="list-style-type: none"> Immediately pass the concern(s) to the Head, Internal Audit with copy to the MD/CEO Development Bank Plc. If the concerns affect the Head, Internal Audit, the MD/CEO shall be notified, and where a Director (including the MD/CEO) is involved, such concern shall be directed to the Chairperson, Board Audit & Compliance Committee and Chairman, Board of Directors who shall direct the external consultants to investigate such concerns. <p>The concern(s) shall be presented in the following format;</p> <ul style="list-style-type: none"> Background of the concerns (with relevant dates) Reason(s) why the whistle-blower is particularly concerned about the situation. <p>Disciplinary measures in line with the staff handbook shall be taken against any staff who receives concerns and fails to escalate. Also, disciplinary measure shall be taken against an internal whistle-blower who acted out of malice.</p>
2	Step Two Investigation of Concerns and update on progress of investigation.	<p>The Head, Internal Audit shall on receipt of the concern(s) acknowledge receipt of the concern from the whistle-blower within 24 hours, and immediately commence investigation personally or forward the concern(s) to an appointed external consultant for investigation (where necessary) The purposes of investigation are to:</p> <ol style="list-style-type: none"> Establish if a wrongdoing has occurred based on the concern(s) raised, and if so to what extent; and To minimize the risk of further wrongdoing, prevent any further loss of assets, damage to the Bank's reputation and if possible protect all sources of evidence. <p>If preliminary investigation shows that the concern falls within the whistle-blowing reportable concerns, then further investigation shall be carried out. If otherwise or the concern is outside the reportable misconduct, then the Head, Internal Audit shall refer the matter to the appropriate quarter (external consultant) for further action.</p> <p>Where necessary, the Head, Internal Audit, shall give an update of the progress of investigation to the whistle-blower if the concerns fall within the reportable concerns.</p> <p>Finally, if the concern raised by the whistle-blower is frivolous, unwarranted or was raised out of malice, necessary disciplinary measures in line with Human Resources policy might be applied to the staff.</p>
3	Step Three Report of Investigation	<p>Upon conclusion of investigation the Head Internal Audit, will prepare and submit a report to the MD/CEO.</p>

	and action on report.	<p>The MD/CEO will review the report and direct the appropriate department to take necessary action based on the recommendations of the report. The Head, Internal Audit, shall on a quarterly basis include a report in the Quarterly Report to the Board Audit and Compliance Committee, on all whistle-blowing incidents under investigation or completed during the quarter.</p> <p>The Whistle- blower will be informed of the outcome of the investigation including the actions taken on the staff concerned.</p> <p>All disciplinary action relating to the report shall follow the Bank’s disciplinary procedure as contained in the staff handbook.</p>
4	Step Four Non-Satisfaction with result of investigation/ action	<p>Additional information to aid investigations may be requested or provided by the whistleblower (in the case of anonymous reports).</p> <p>If the whistle-blower is not satisfied with the extent of investigation and/or the action taken based on the outcome of the investigation, the whistle-blower is at liberty to seek for further investigation after providing additional relevant information.</p> <p>If the whistle-blower is not satisfied with the outcome of the second investigation, the whistle-blower is at liberty to report to the Chairperson of the Board Audit and Compliance Committee on IAkpofure@devbankng.com.</p>
All parties to the whistle-blowing incidence that feel victimized can report their grievance(s) to the Chairperson, Board Audit and Compliance Committee. This is without prejudice to the fundamental right of the internal whistle-blower to seek redress in the court of law.		

8.0 Outsourced Whistle-Blowing Procedure managed by Deloitte

To assure all stakeholders of the confidentiality and anonymity of reported concerns, DBN also maintains an outsourced whistle-blowing service managed by an independent party, Deloitte. The platform provided by Deloitte for raising concerns is branded Deloitte Tip-Offs Anonymous (TOA).

All whistle-blowing reports should be made using any of the Deloitte TOA reporting channels (see Appendix I)

Before making a Tip-off (report submission), it is important to obtain as much relevant information as possible, as the whistle-blower would be requested to provide some necessary information (see Appendix I).

8.1 Whistle-blower Identity Options

There are three (3) options to choose from in protecting your identity as a whistle-blower. This comprises: Completely Anonymous, Partially Anonymous and Confidential Disclosure. Deloitte encourages whistle-blowers to select either options of 'partially anonymous' or 'full disclosure', in order to afford DBN sufficient information to better handle your concern. All whistle-blower reports are handled confidentially.

Completely Anonymous

A Whistle-blower who selects the completely anonymous option, will not be required to supply his/her name or any information that might reveal the whistle-blower's identity. Consequently, the details of the whistle-blower is unknown to either Deloitte or DBN. However, Deloitte TOA will be unable to contact the whistle-blower for more information on behalf of DBN, if further information about the whistle-blower's reported concern is required.

Partially Anonymous

A Whistle-blower who selects the partially anonymous option, will be required to disclose his/her personal details to Deloitte only. Deloitte Tip-Offs Anonymous contact centre manages this reporting facility. The whistle-blower's personal details would not be divulged to DBN. If further information about the whistle-blower's reported concern is required, the Deloitte Tip-offs Anonymous contact centre will contact the whistle-blower.

Confidential Disclosure

A Whistle-blower who selects the confidential disclosure option, will be required to disclose his/her personal details to Deloitte and DBN. The whistle-blower's name and contact details would be known to the Deloitte Tip-offs Anonymous contact centre, DBN and the investigators that will conduct the investigation.

8.2 Subsequent Action

Upon receipt of a report, via any of the TOA reporting channels, Deloitte transmits the report to the designated recipient within DBN (see Appendix III) for investigation to be conducted. Deloitte will send each TOA report to designated officers usually within 24 hours, of receiving an incident reported by a stakeholder.

Public holidays, weekends and events/circumstances beyond the control of Deloitte (such as strikes, riots and other force majeure) are excluded from the 24 hours timeline within which reports are required to be submitted to the Company.

8.3. Feedback to Whistle-blower

Feedback will be provided by DBN to Deloitte Tip-offs Anonymous after investigation and subsequently transmitted to the whistle-blower through the initial channel of submission, upon the request of the Whistle-blower (see Appendix II).

Deloitte would immediately acknowledge receipt of any reported concern by a whistle-blower. However, feedback on the outcome of any reported concern would be dependent on DBN time to completion of its internal investigations.

8.4 Time Limit for Investigation

It shall be the policy of the Bank to handle investigations promptly and as soon as possible. While it might not be possible to set a specified time frame for the conclusion of an investigation, since the diverse nature of potential concerns may make this impracticable, the Head, Internal Audit working with the external consultant shall endeavor to resolve all concerns within four weeks. Where for any reason, proper resolution is unable to be achieved within this time frame; the Head, Internal Audit shall advise the MD/CEO accordingly, and report to the Chairperson, Board Audit and Compliance Committee.

9.0 Wider disclosure

A whistle-blower whether internal or external may elect to disclose directly to the regulatory body – Central Bank of Nigeria using the following channels:

- Complaint form: <https://www.cbn.gov.ng/Contacts/Complaints/>
- Email address: contactcbn@cbn.gov.ng
- CBN's helpline: +234-700-225-5226

10.0 Protection and encouragement for the Whistle-Blower

It shall be the policy of the Bank to protect and encourage whistle blowers who disclose concerns, provided the disclosure is made;

1. In the reasonable belief that that it is intended to show malpractice or impropriety; and
2. In good faith without malice or mischief.
3. The Bank shall maintain the confidentiality or anonymity of the person(s) making the complaint to the fullest extent reasonably practicable within the legitimate needs of the law and of any ensuing evaluation or investigation. If the situation arises where the matter cannot

be resolved without revealing the identity, (for example, because his/her evidence is needed in court), it will be discussed with the individual how the Bank can proceed.

4. This protection means that the Bank shall not discharge, demote, suspend, threaten, harass or, in any manner, discriminate against any employee in the terms and conditions of employment based upon the lawful action of any such employee with respect to good faith reporting of a matter covered by these procedures.
5. While all disclosures resulting from whistle-blowing shall be treated with a high level of confidentiality, staff and other relevant stakeholders are encouraged to disclose their name to make the report more credible. The Bank shall take the following into consideration in considering unanimous disclosure:
 - i. seriousness of the issues being reported;
 - ii. the significance and credibility of the concern; and
 - iii. the possibility of confirming the allegation.

The Bank shall not subject a whistle-blower to any detriment. Where a whistle-blower feels unfairly treated owing to his/her actions, the whistle-blower shall be at liberty to report to the Chairperson of the Board Audit and Compliance Committee. Where the whistle-blower is still treated unfairly, he/she is at liberty to report to the Central Bank of Nigeria. This is without prejudice to the right to take appropriate legal action.

Where necessary, compensation of whistle-blowers whether internal or external that have suffered detriment shall be at the discretion of the Board of Directors of the Bank taking into consideration regulatory guidance on compensation of whistle-blower to be issued from time to time.

Where the outcome of whistle-blowing report leads to recovery of the Bank's funds, the Whistle-blower shall be entitled to be paid the sum of between N100, 000 to N500, 000 of the recovered sum as an incentive for all authentic whistle-blowing. Other incentives such as commendation, salary increment, or promotion may be recommended by the HR in addition to or in the alternative to the cash incentive. Where recovery of funds is not involved, the HR may recommend incentives to the whistle-blower such as commendation, salary increment or promotion to the next level, whichever is appropriate in the circumstance.

11.0 Disclaimer

A stakeholder's right to protection under this policy does not extend immunity for any complicity in the matters that are the subject of the report or an ensuing investigation or for reports made maliciously.

If it is discovered that an individual has raised a concern falsely, maliciously, vexatious or with a view to personal gain, such an individual will lose the protection provided under the Policy. In this circumstance, if the individual is an employee of the Bank, the person's actions will constitute misconduct, and the matter will be dealt with in accordance with the Bank's disciplinary procedures. Furthermore, the Bank reserves the right to take legal action against members of staff who are shown/known to have made unreasonable disclosure outside this Policy and or to External Parties.

Where the person is a third- party stakeholder, the Bank reserves the right to terminate the relationship forthwith.

APPENDIX I

Procedure for using Deloitte Tip-Offs Anonymous

How it Works: Whistle-blowing reports should be made using any of the Deloitte TOA reporting channels listed below.

- Toll free hotline: 0800TIPOFFS (0800 847 6337).
- Web Portal: <https://tip-offs.deloitte.com.ng>.
- E-mail: tip-offs@deloitte.com.ng.
- Mobile App: Download Deloitte Tip-offs Anonymous App on Android or iOS devices.

Step 1:

Whistle-blower contacts Deloitte Tip-offs Anonymous contact centre via the toll- free hotline (Calls are toll free to all networks).

Dial the hotline from any telephone of your choice. You may call anonymously – even if you disclose your name, your identity will remain confidential and will not be disclosed to the Bank except with your consent

Step 2:

Our contact centre agent provides options of anonymity, prompts questions and provides a unique reference number to the whistle-blower. The contact centre agent interviews the whistle-blower to obtain as much relevant information as possible.

Ensure you provide all the available details:

- a. Nature of the incident
- b. People involved
- c. Dates of incident
- d. Place of occurrence
- e. How the incident occurred
- f. Any other useful information

Step 3:

Report analyst sanitizes report to remove any details that might identify the whistle-blower.

You will be assigned a unique reference code (PIN) – keep this confidential as you will need this number if you make a follow up.

You may call back for feedback on your report or to provide additional information

Step 4:

The information received is captured into a TOA report format, the report is reviewed by the Contact centre manager and transmitted to designated persons within DBN for further action.

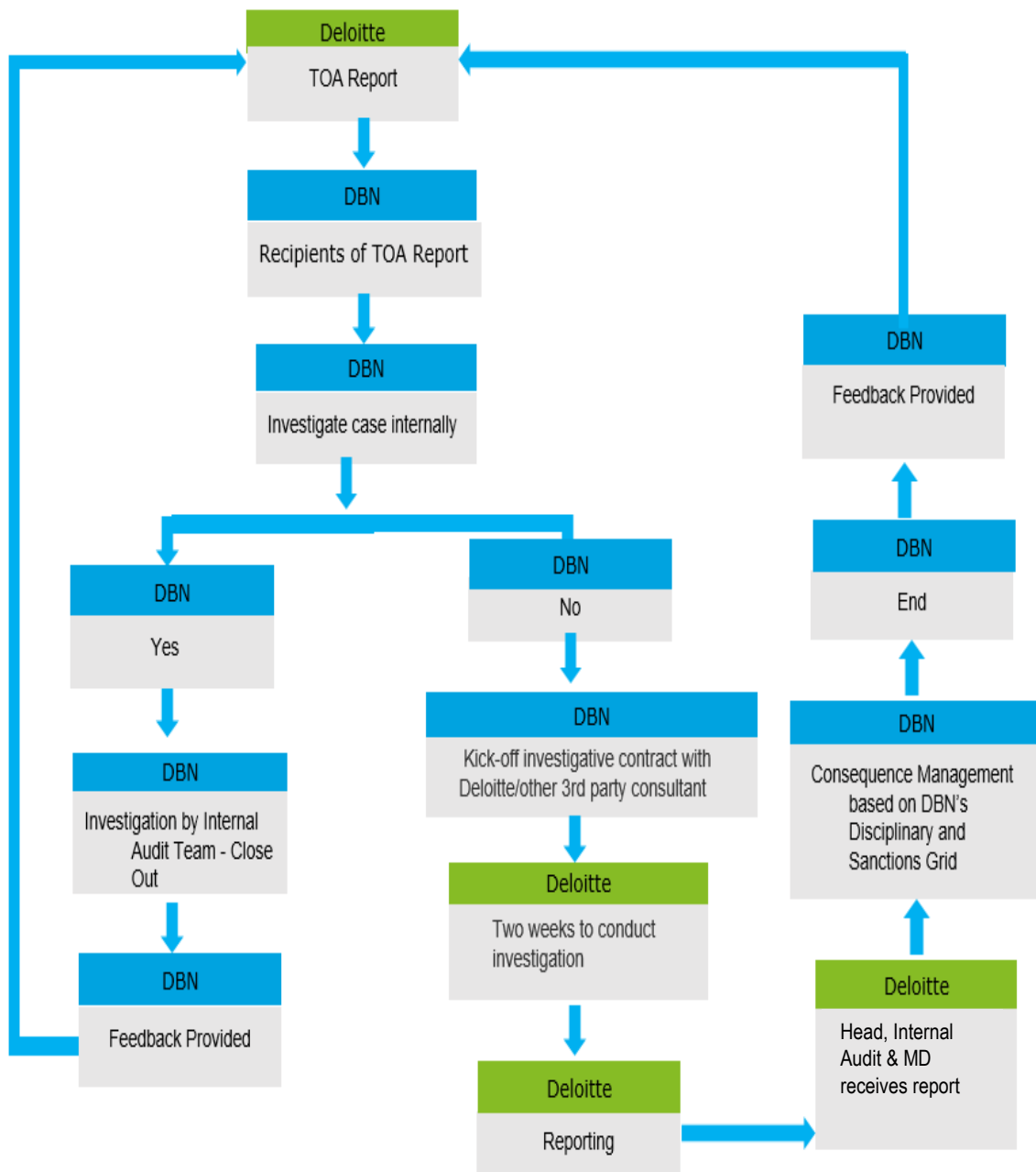
Step 5:

Investigation is conducted and feedback provided to Deloitte by DBN

Step 6:

The Whistle-blower may subsequently call back to provide additional information or for feedback request.

APPENDIX II



APPENDIX III**Development Bank of Nigeria (DBN) Plc****Tip-Offs Anonymous (TOA) Report Escalation Matrix**

Type of incident	Recipients	Contact Details
Fraud	Managing Director	tokpanachi@devbankng.com
	Head Internal Audit	johioma@devbankng.com
Human resource related matters (for example, sexual harassment)	Managing Director	tokpanachi@devbankng.com
	Head Internal Audit	johioma@devbankng.com
Breach of the Code of Conduct and Business Principles	Managing Director	tokpanachi@devbankng.com
	Head Internal Audit	johioma@devbankng.com
Theft of Bank asset	Managing Director	tokpanachi@devbankng.com
	Head Internal Audit	johioma@devbankng.com
Any other type of unethical conduct	Managing Director	tokpanachi@devbankng.com
	Head Internal Audit	johioma@devbankng.com
Allegations against the Head, Internal Audit	Managing Director	tokpanachi@devbankng.com
	Chairperson, Board Audit & Compliance Committee	iakpofure@devbankng.com
Allegations against other Directors (other than the Managing Director) irrespective of the type of incident	Chairperson, Board Audit & Compliance Committee	iakpofure@devbankng.com
	Ag. Chairman, Board of Directors	bkyari@devbankng.com
Allegations against the Managing Director irrespective of the type of incident	Ag. Chairman, Board of Directors	bkyari@devbankng.com
	Chairperson, Board Audit & Compliance Committee	iakpofure@devbankng.com
Monthly Summary Reports	Managing Director	tokpanachi@devbankng.com
	Head Internal Audit	johioma@devbankng.com