

Our Compliance and Ethics Approach

Our Compliance and Ethics Approach

CBE Compliance and Ethics Approach: Holding ourselves to high ethical standards

Acting in an ethical manner is essential to building trust with society. Our stakeholders not only expect us to do what is legally required but also to follow high standards of ethical behavior.

Our Code of Ethics, which comprises five (5) broad Values, and Our SIMUNYE Culture Ethos are the most fundamental elements and the backbone of our Culture. The Code guides employees in daily decision-making and provides an ethical framework for our ethical risk management approach.

We regard ethics, compliance, and good risk management as crucial to maintaining public trust. This approach is overseen by our Compliance and Ethics division of the Internal Affairs and Security Department; it ensures clear alignment between compliance and ethics risk management, policies, and controls. We have specific internal policies in place in areas such as Policy on Outside Employment and Occupation, Code of Governance, Compliance Management Policy, and Framework which help us maintain high standards of ethics and integrity in our

behaviors within and outside the CBE environment.

The Board Risk and Board Audit Committees oversee the implementation of the CBE's compliance management and ethics functions (respectively), including risk-based Bank-wide policy and internal control management.

The Board provides the highest layer of oversight over the Bank's compliance and ethics programme. It focuses on the most significant risks, while the Board Risk and Audit Committees review the entire compliance and ethics risks portfolios and actions implemented by management.

Supporting ethical decision-making

We are making progress in embedding our Code of Ethics across the Bank and supporting employees to do what is right when faced with ethical dilemmas. In 2022, we continued to raise awareness of the Code of Ethics on employees via the collective sessions as well as role-specific sessions. In addition, individual guidance on the internal Code of Ethics was given to employees to help resolve ethical

dilemmas.

We improved the way we manage conflicts of interest with the disclosure process and support. Around 28 employees completed declarations on potential conflicts of interest. Further, we took steps to enhance the integration of ethics dialogue into the process for on-boarding new employees.

Prevention and mitigation actions

Our Code of Ethics has been updated and supplemented, and the new version has been published on our internal website, CentraNet.

The review/update was in line with our internal policy lifecycle of three (3) years as well as the need to incorporate the CBE SIMUNYE Culture into the Code of Ethics.

A process to raise awareness among employees and other CBE stakeholders of the Code and the expected behavior is underway.

As part of our compliance & ethics approach, we have a comprehensive ethics reporting system to detect and prevent systemic misconduct. This system includes a dedicated email (ethics@centralbank.org.sz), a Hotline (800 6060), postal address: P.O. Box 3221 Mbabane and telephone number: 2408 2114.

Our stakeholders (internal and external) are strongly encouraged to make use of these reporting mediums where they suspect or witness unethical or illegal conduct.

As CBE, we are committed to the highest standards of ethical conduct and integrity in all our business activities. We provide an environment that seeks to safeguard the interests of all our stakeholders. We work hard to ensure we have an organisational culture that promotes such an environment.

