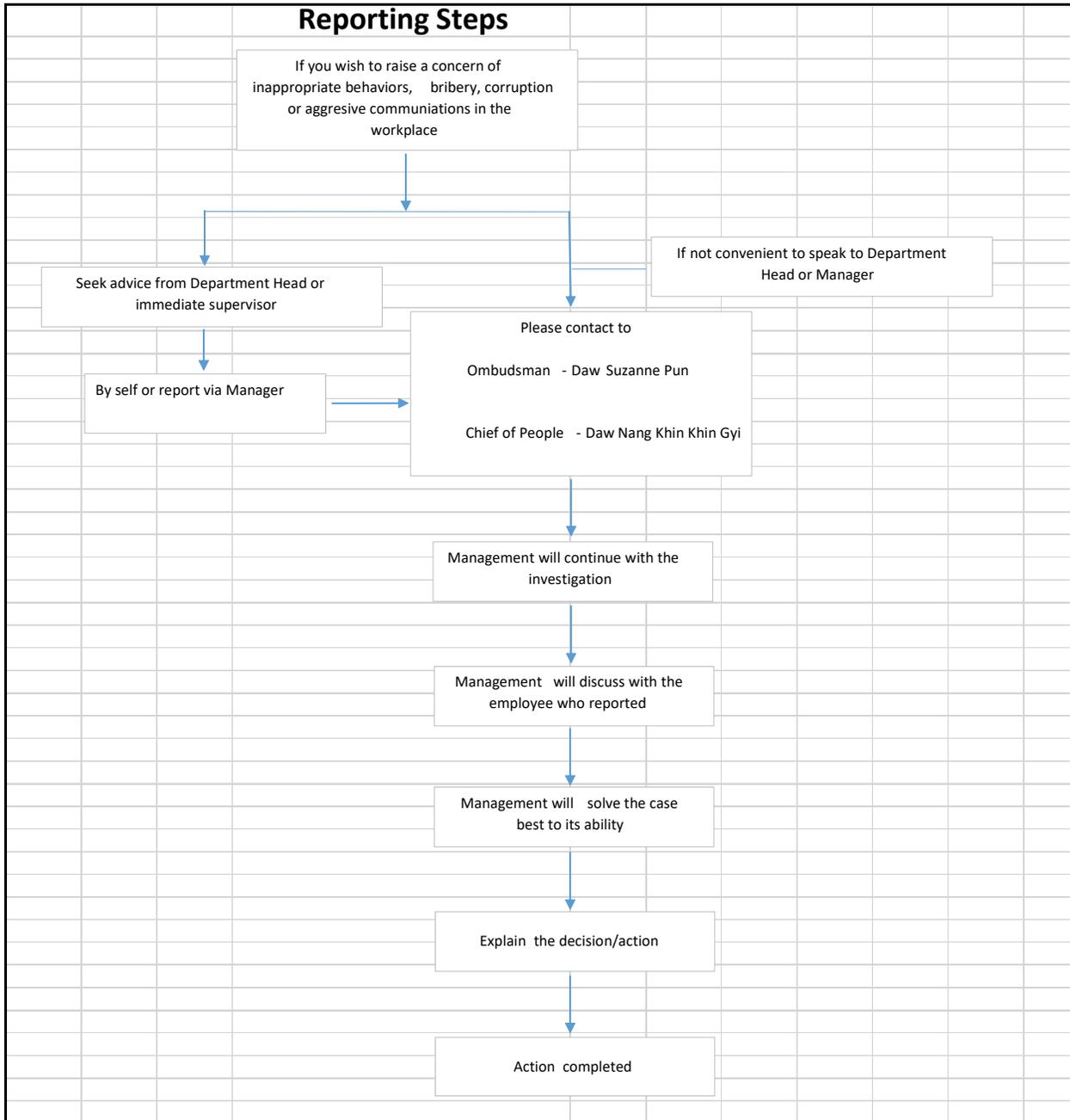


Speak Up

7.1. Speak Up Policy

All Yoma Bank employees are required to report any suspected breach, or potential breach, of our *Code of Conduct and Business Ethics*. We will investigate reports and take action when necessary. We will not tolerate harassment or retaliation against anyone who seeks advice, raises a concern or reports a suspected breach.

If you wish to raise a concern, you should do so in accordance with the procedures set out in the Bank's *SpeakUp Policy*.



7.2. Policy Rationale

Failure to operate in accordance with *Code of Conduct and Business Ethics* represents a risk to the reputation of Yoma Bank and could threaten the continued success of our business. If breaches occur despite our system of internal controls, reports by personnel and others provide a means for Yoma Bank to initiate proper investigation and take necessary action. We therefore require all employees to report actual or suspected breaches.

7.3. Manager Responsibilities

If a manager receives a report of a concern (in their capacity as a line manager or otherwise), they must deal promptly with the issue raised in accordance with applicable Yoma Bank reporting requirements, seeking guidance from HR or Compliance when necessary.

7.4. Why have a Speak Up Policy?

Having a Speak Up Policy, which is run in an open and transparent manner, is part of good business management for a number of reasons.

7.4.1. Good risk management

If an issue is raised internally first, and acted upon, it is likely to minimize reputation damage. If employees contact their managers, rather than the press or the regulator, about actual or suspected malpractice, the problem can be corrected before it escalates. Through helping to ensure adherence to both the law and an organisation's code of ethics, it can also help to reduce an organisation's legal claims.

7.4.2. Maintain and improve performance

Speaking Up can be viewed as part of a general strategy to maintain and improve performance. By deterring malpractice and averting crises a Speak Up Policy can contribute to the efficient running of the organisation. Reporting issues will detect and possibly deter any further wrongdoings, creating an open culture. It provides the senior management of an organisation with the information they need to assist in decision-making and risk control.

7.4.3. Protect staff, customers and the public

An effective *Speak Up Policy* can protect employees from health and safety issues or bullying and harassment from other employees. Customers and the public can also be protected from the effects of malpractice (such as overcharging).

7.4.4. Reduce financial losses

Most organisations may have been or will be the victim of fraud or theft at the hands of their own employees. The *8th Ernst & Young Global Fraud Survey* found that 85% of the worst frauds against companies were committed by employees. One in five employees stated that they were personally aware of people stealing from their employers. The rate of recovery from financial losses (from all sources) was just 51%.

7.4.5. Improve staff morale and reduce staff turnover

A *Speak Up Policy* sends a strong message to all levels of the workforce that bad practice will not be tolerated. A working environment in which it is clear that bullying, harassment and discrimination are not tolerated reassures employees that their concerns are important, and encourages problems to be brought to the attention of management internally rather than through an external agent such as the media. It

makes for a happier workforce if employees believe that mutual trust exists. With staff morale and loyalty increased, retention rates are higher and attracting potential recruits is easier.

7.4.6. Increase investor confidence

A Speak Up Policy will help to improve investor confidence by demonstrating that the organization is serious about good corporate governance and has robust risk management measures in place.

7.4.7. Lower insurance premiums

As management processes are assessed when insurers set premiums for director and officer liability insurance, having a *Speak Up Policy* in place, and disclosed to the Bank's insurer, may lead to lower premiums.