

OUR COMMITMENT TO INTEGRITY AND TRANSPARENCY

FBC Holdings is committed to the highest standards of integrity, ethics and accountability. We maintain a zero-tolerance approach to any form of fraud, corruption, or bribery, which is a fundamental component of our comprehensive Environmental, Social and Governance (ESG) framework. Our commitment, set out in our Group Anti-Fraud, Bribery and Corruption Policy, is a cornerstone of our governance framework, ensuring that we conduct our business responsibly and with full transparency. This policy applies to all employees, directors, officers and contractors of FBC Holdings Group and its subsidiaries.

OUR ANTI-FRAUD FRAMEWORK

Our comprehensive framework for preventing; detecting; and investigating fraud and corruption is a top-down commitment. The Board of Directors holds ultimate responsibility for our anti-fraud framework, while the Group Managing Director is responsible for its overall implementation. Our framework is built upon the internationally recognised three Lines of Defense model to ensure clear accountability:

- **First Line of Defence:** Our frontline personnel and operational units are responsible for identifying and mitigating fraud risk within their daily activities.
- **Second Line of Defence:** Group Compliance and other support functions provide oversight and monitor the first line of defence to ensure policies and procedures are followed.
- **Third Line of Defence:** Group Internal Audit provides an objective evaluation of the fraud risk management framework's effectiveness, ensuring continuous improvement and compliance.

We also conduct regular training and awareness programmes to reinforce our policies and help prevent fraud and corruption from occurring.

REPORTING AND ACCOUNTABILITY

We believe that integrity is a shared responsibility. We have established a dedicated, reporting mechanism, to provide a secure and confidential channel for employees, customers, suppliers and all other stakeholders to report any suspicions of fraud, corruption, or other unethical conduct. All information received is treated as strictly confidential, and the system is managed by an independent third party to ensure complete anonymity and confidentiality.

HOW TO REPORT

To make a report, stakeholders can use one of the following channels:

- Toll-Free Hotline:** 0800 4101 or 0800
- WhatsApp:** +263 772 131 716
- Email:** reports@axcentiumethicsline.co.zw
- Website:** www.axcentium.co.zw

We assure all clients and stakeholders that any reported allegations will be thoroughly and promptly investigated according to our established policies and procedures.

DELIVERING WITH CONFIDENCE

By fostering a culture of integrity and accountability, we ensure the security of our operations and protect our stakeholders. We are confident that by maintaining a fraud and corruption-free environment, we can continue to deliver a high standard of service and build a more trustworthy financial system.