BRIBERY AND CORRUPTION POLICY

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Document History

Change Record

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Reviewers & Approvals

This document has been reviewed and approved by the undersigned

Name	Position	Signature	Date	Issue No
B. A. Ogbebor	MD/CEO			1

Distribution List

A current version of this document is available to member of Staff. This document has been issued on a version controlled basis to the following:

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All Staff		23/06/2025	1
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FSIL POLICY ON BRIBERY AND CORRUPTION

1. Introduction

This Policy highlights our company's position on the issues around Bribery and Corruption and its impact on the company's principles of good business conduct and fairness in all our dealings with our clients, business partners and all stakeholders.

The Policy demonstrates the importance the Company places on its integrity and the perception it projects to the outside world in a fast changing operating business environment in which capital market operators are increasingly being driven by the need to inspire fairness, transparency and investors' confidence.

2. Background of the Policy

The Stock market is a highly sophisticated market where millions of individuals and corporate entities including regulators, market operators, investors and service providers participate in the market from across the World. The market is often seen as a haven of investment activities that create opportunities for people to earn returns on their investment. The market potential and investor confidence can therefore, be impacted negatively if markets operators and regulators do not put conscious efforts in place to discourage and deal decisively with negative tendencies like bribery and corruption.

3. Purpose of the Policy

The purpose of this Policy is to formalize FSIL approach in dealing with issues pertaining to Bribery and Corruption to ensure that the company implements adequate controls that will stamp it out in all its ramifications.

4. Nature of Business of the Company

Foresight Securities & Investment Limited is duly registered as a Broker/Dealer by the Securities & Exchange Commission (SEC). As a Broker, the Company buys and sells shares and other financial instruments traded on the Nigerian Exchange on behalf of its clients as well as provide them with investment advisory services. As a Dealer, the Company buys and sells shares and other financial instruments on its own account. The Company is also licensed by the Nigerian Exchange Limited (NGX) as a Trading License Holder (TLH).

5. The Policy

(a) Our Company maintains a zero tolerance policy on Bribery and Corruption in all its ramifications. This position is also well spelt out in our Procedural Manual and General Staff Regulation under conflict of interest. We encourage whistle blowing so that aggrieved persons can expose corrupt practices without retributions. Our company is built on trust and integrity. Consequently, we abide strictly with the Code of Ethics that guide Capital Market operations issued by the Securities and Exchange Commission, the Nigerian Exchange, Chartered Institute of Stockbrokers and various Codes of Good Corporate Governance. We have worked so hard to earn our name and reputation for doing business professionally in a fair, transparent, orderly manner and with the highest level of integrity and goodwill.

(b) None of our employees is allowed to give or accept bribe or engage in any form of corrupt practices, with a view to influencing the ordinary course of business decision making to advance selfish interests.

(c) Any case of bribery and Corruption is referred to our Disciplinary Committee for appropriate action. Such cases are investigated by the committee and depending on the severity, are dealt with internally or escalated to the Capital Market Committee on Ethics.

(d) The Disciplinary Committee headed by the Managing Director/CEO usually meets with the Board of Directors on quarterly basis where serious cases of bribery and corruption among others, are considered if any.

Finally, this policy on the prohibition of Bribery and Corruption is issued under the Authority of our Board of Directors and signed by our Managing Director/CEO.

Chief (Barrister) Bright Alex OGBEBOR
Managing Director/CEO