



CIBKe Third Parties' Handbook





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The image features a dark blue background with a grid pattern representing window panes. In the center, the silhouettes of a man and a woman are shown shaking hands. The man is on the left, wearing a suit, and the woman is on the right, wearing a business suit and carrying a briefcase. Their reflections are visible in the lower half of the image. A semi-transparent dark blue rectangle is positioned behind the text.

Welcoming Word

CIBKe Welcoming

Dear Valued Partner,

Welcome to the CIB Kenya Third Parties' Handbook.

At CIB Kenya, we believe strong partnerships are essential to delivering trusted, secure, and efficient banking services. As we advance our transformation journey, this handbook reaffirms our commitment to working with third-party partners who share our values of integrity, accountability, and innovation.

This document outlines the standards, expectations, and shared responsibilities that govern our collaboration. It reflects our alignment with internal policy, group standards, and the Central Bank of Kenya's Prudential Guidelines on Outsourcing (CBK PG/16), ensuring our engagement remains compliant, transparent, and resilient.

We count on you not just as a Third Party but as a strategic partner contributing to our customer promise and long-term success. Through clear communication, proactive risk management, and continuous improvement, we aim to build a relationship based on trust, performance, and mutual growth.

Warm regards,

Chief Executive Officer

Commercial International Bank (CIB) Kenya Limited.





Introduction

INFORMATION

About CIBKe

Welcome to CIB Kenya Limited – The Bank to Trust

Commercial International Bank (CIB) Kenya Limited is a privately owned commercial bank licensed by the Central Bank of Kenya (CBK). Established in 2017 as Mayfair Bank Limited, the institution began operations in the same year and has since undergone a strategic transformation following its acquisition by CIB Egypt, the leading private sector bank in Egypt.

In January 2023, CIB Egypt completed a full acquisition, making CIB Kenya its first fully owned subsidiary outside Egypt. This milestone redefined our identity, strengthened our capital and governance structures, and embedded global banking expertise into our operations, enabling us to serve the Kenyan market with regional depth and local agility.

Headquartered in Westlands, Nairobi, CIB Kenya offers a diverse portfolio of banking solutions across retail, SME, and corporate segments. Our service model is underpinned by a forward-looking strategy that emphasizes customer-centricity, digital innovation, risk-conscious growth, and compliance with both local and international standards.

Guided by our vision “to be at the forefront of change, building for the future, and turning aspirations into reality”, CIB Kenya is driven by its people, its values, and a strong commitment to excellence. We operate with a sense of purpose, fully aligned to regulatory expectations, including the CBK Prudential Guidelines, and to the needs of Kenya’s evolving financial ecosystem.





Our Vision

To be at the forefront of change, building for the future, and turning aspirations into reality.



Our Mission

To transform traditional financial services into simple and accessible solutions by investing in people, data, and digitalization to serve tomorrow's needs today.



Our Values

- Customers First – We listen, anticipate, and go the extra mile.
- Lead the Market – We innovate, invest, and set benchmarks.
- Agility – We adapt quickly and think forward.
- Integrity – We uphold transparency, accountability, and ethics.

“Customers First, Lead the Market, Agility & Integrity”

Business Imperative



This handbook outlines the key rules, standards, and procedures that govern CIB Kenya's relationships with third parties. Its goal is to promote consistent understanding, reduce ambiguity, and ensure all third parties align with CIB Kenya's policies, regulatory obligations (including CBK PG/16), and risk expectations.

All third parties are expected to familiarize themselves with this handbook to support a secure, compliant, and resilient partnership.

Disclaimer

This handbook is a reference tool and does not override any binding terms in formal contracts or legal agreements. In the event of any inconsistency, the executed contract prevails.

CIB Kenya may revise the content at any time in line with internal policy or regulatory updates.

A blue-tinted photograph of two people in business attire reviewing documents with charts and graphs. One person is pointing at a chart with a pen. The text 'Before the Ship Sails' is overlaid in a white serif font on a dark rectangular background.

Before the Ship Sails

Regulatory Requirements



Given the strategic importance and potential risks of engaging third parties, CIB Kenya is committed to upholding high regulatory and operational standards in all Third Parties relationships.

As required under the Central Bank of Kenya (CBK) Prudential Guidelines on Outsourcing (PG/16) and related frameworks, third parties must comply with specific contractual and operational obligations. These include:

- Delivering services to agreed quality and performance standards.
- Safeguarding the confidentiality and integrity of all client and bank information.
- Granting the Bank the right to terminate contracts, without undue penalties, where obligations are breached.
- Notifying the Bank promptly of any changes or events that may impact service delivery or risk exposure.
- Submitting to regular monitoring, reviews, and performance reporting.
- Cooperating with the Bank's audit and oversight activities, including access by the CBK or its designated examiners.

All third-party engagements must remain compliant with both current and future regulatory requirements. CIB Kenya expects its third-party partners to stay informed and prepared to adjust as regulatory expectations evolve.

Due Diligence Process (Know Your Partner!)



It is important that we get to know our Third Parties and performing Due Diligence is an important step of our Third-Party onboarding process. The due diligence process involves

- Confirming the legal existence and registration of the third party
- Verifying ownership structures and beneficial owners
- Checking business licenses and regulatory approvals
- Reviewing the Conflict-of-Interest and ABC Declarations
- Reviewing the reputation and track record of the organization and key personnel
- Checking for adverse media coverage or regulatory issues
- Assessing financial stability and creditworthiness of the third party.

The third-party onboarding documents shall differ depending on the nature of business and business location, with documentation requirements tailored to address specific risk profiles and regulatory obligations.

Why It Matters

Third Party Due Diligence is important for the Bank because it serves as a critical process that protects against financial crimes, operational disruptions, and regulatory violations by thoroughly vetting of our business partners before engagement. It ensures compliance with anti-money laundering, anti-corruption, and data protection regulations while demonstrating to supervisors that robust oversight frameworks are in place, thereby reducing the risk of penalties and enforcement actions. Ultimately, it has become indispensable in today's interconnected business environment where regulatory scrutiny is heightened, and supply chain vulnerabilities can significantly impact business continuity and competitive positioning.

Contractual Protections



Every third-party relationship at CIB Kenya must be governed by a formal agreement that clearly defines the scope of services, responsibilities, and expectations of both parties. The agreement shall also stipulate that payment terms will be in line with the mutually agreed provisions, subject to review and approval in accordance with the Bank's policies and internal approval framework. In addition, the agreement should set out remedies or penalties for non-performance, delays, or breach of obligations, aligned to the Bank's procurement and legal standards.

Key Components of a Third Party's Agreement.

- Independent Contractor Status
- Scope & Deliverables
- Payment & Penalties
- Confidentiality & Data Protection
- Liability & Termination
- Regulatory Compliance
- Audit Rights

All contracts undergo internal review to ensure legal, compliance, and risk requirements are met before onboarding.

Confidentiality and Data Security



CIB Kenya is committed to protecting all sensitive, confidential, and proprietary information shared with or accessed by third parties during the course of engagement.

All third-party contracts must include clear confidentiality and data protection provisions to:

- *Safeguard non-public information related to the Bank, its clients, and operations.*
- *Ensure data is only used for the agreed purpose.*
- *Prohibit unauthorized disclosure, transfer, or processing, and*
- *Ensure compliance with the Kenya Data Protection Act, CBK PG/16, and internal policies.*

Where applicable, Data Protection Agreements (DPAs) may be issued for services involving access to personal or sensitive client data.

Third parties are required to implement adequate technical and organizational controls to protect data confidentiality, integrity, and availability.

Conflict of Interest:

What is Conflict of Interest?

Refers to a situation in which a person has direct or indirect private or personal interest in a matter which is sufficient to directly or indirectly influence or has the potential to directly or indirectly influence the objective exercise of his or her official or professional duties or the making of impartial judgment over the same or related matter.

Why is Declaring conflict of Interest Important?

- It builds Trust between the Bank and the Third Parties. This ensures transparency and assures the bank that Third Party relationships are conducted ethically and without hidden interests.
- Declaration of COI ensures Fair Procurement processes and prevents biased decision-making in Third Party selection, pricing, or contract awards.
- It protects reputation for both the bank and the Third Party from undisclosed relationships or favoritism.
- Declaration Supports Compliance with regulatory and governance standards that require disclosure of potential conflicts in Third Party relationships.
- Assists in identifying potential issues that may include insider dealings, preferential treatment, among others before they escalate into financial or legal risks.
- It demonstrates good faith and accountability, fostering a long-term business relationship with the bank.

A person in a dark suit and white shirt is shown from the chest down, sitting at a desk and using a laptop. The image is heavily stylized with a blue tint and semi-transparent overlays of financial data, including line graphs, bar charts, and numerical values like '10784.0', '32021.44', '24.01', and '78044.32'. The text 'Our Journey Begins' is centered in a white serif font within a dark rectangular box.

Our Journey Begins

Monitoring and Overseeing (Reporting)



What is TP Risk Monitoring and How Does It Work?

TP risk monitoring is the ongoing process of collecting and reviewing information about a third party's performance and risk exposure. This includes tracking compliance, reviewing records, analyzing risk indicators, and, where necessary, conducting audits or site visits.

Why is TP's Risk Monitoring Important?

Active monitoring of third parties helps CIB Kenya manage risks related to cybersecurity, finance, ethics, compliance, and reputation. It supports transparency, trust, and operational resilience, ensuring the Bank maintains secure and sustainable partnerships.

To accurately assess and manage third-party risks, CIB Kenya applies structured methodologies aligned with its internal risk framework and CBK PG/16 expectations.

Some Types of TPs Key Risks

ESG Risk Monitoring

At CIB Kenya, integrating ESG (Environmental, Social, and Governance) risk into third-party relationships is a strategic imperative, supporting responsible banking and regulatory alignment (CBK PG/16, Climate Risk Disclosure Framework, Green Finance Taxonomy).

CIB Kenya is committed to progressively incorporating Environmental, Social, and Governance (ESG) due diligence into third-party onboarding and ongoing monitoring.

Reputational Risk

Reputational risk arises from actions or associations that could damage CIB Kenya's public trust, customer confidence, or regulatory standing. This includes unethical practices, regulatory breaches, poor service delivery, or failures by third parties that reflect poorly on the Bank.

Reputational integrity is vital to CIB Kenya's brand; thus, third-party non-compliance or actions that harm the Bank's reputation may result in contract termination and regulatory consequences.

Business Continuity Risk

CIB Kenya depends on third parties to deliver critical services that support banking operations. Disruptions, process failures, or resource gaps on the Third-Party side can compromise service delivery and business continuity.

Operational resilience is key to safeguarding the Bank's stability and protecting customer trust.

Fourth-Party and Subcontracting Risk

In today's complex supply chains, risk does not end with direct Third Parties. CIB Kenya acknowledges the potential exposure arising from fourth parties, those subcontracted or engaged by our contracted third parties.

This ensures that the entire delivery chain upholds CIB Kenya's standards of performance, compliance, and accountability.

What are the Risks related to Third Party?



Incidents Response Plan



What is The Meaning of a Third party's Incident?

A third-party incident is any event, actual or potential, that disrupts service delivery, impacts CIB Kenya financially or reputationally, breaches regulatory requirements, or involves penalties, compensation, or customer harm. Incidents may be operational, legal, cyber-related, or compliance based.

Response Protocol

CIB Kenya follows a structured incident response framework, supported by its Third-Party Risk Management (TPRM) function and other key teams (Risk, Legal, IT Security, Compliance).

Report and Comply with the Incident Requirements

Depending on the nature, scale, and impact of a third-party incident, there may be requirement to notify and engage with various internal and external stakeholders. This ensures full transparency, regulatory compliance, and accountability.

Key requirements include:

- Regulatory Reporting
- Legal and Contractual Obligations
- Internal Escalation
- Audit and Documentation

Monitoring and Follow-Up

After the immediate resolution of a third-party incident, there is need to prioritize ongoing monitoring and follow-up to ensure that the event has been fully contained, and residual risks have been addressed.

Key requirements include:

- Ongoing Surveillance
- Remediation Validation
- Stakeholder Communication
- Performance and Accountability Review
- Lessons Learned Integration

Cyber Security



Why Cybersecurity Matters at CIB Kenya

As financial services become increasingly digital, CIB Kenya places utmost importance on protecting customer and institutional data. Cybersecurity is not just a technical requirement, it is a core business imperative that directly affects trust, compliance, operational continuity, and reputation.

With an adoption on robust strategies, systems, and controls to safeguard critical infrastructure and data assets against cyber threats, unauthorized access, data breaches, and service disruptions.

Our Cybersecurity Expectations for Third Parties

Third parties must implement and maintain adequate information security frameworks, commensurate with the nature and criticality of the services provided. These frameworks should:

- Comply with CIB Kenya's Information Security Policies and Standards.
- Align with local data protection laws such as the Kenya Data Protection Act, 2019, and sector-specific CBK guidelines.
- Ensure encryption, secure transmission, and controlled access to sensitive data.
- Include data backup, disaster recovery, and business continuity planning.
- Be tested regularly for vulnerabilities and subject to periodic independent audits or certifications (e.g., ISO 27001).

Third-Party Data Privacy Obligations

Where a third party processes personal data on behalf of CIB Kenya (as a data processor), it is required to:

- Act only on the instructions of CIB Kenya, the designated data controller.
- Ensure that appropriate technical and organizational measures are in place to protect personal data.
- Promptly report any actual or suspected data breach to the Bank within agreed timelines.
- Sign a Data Processing Agreement (DPA) where applicable, especially where services involve sensitive or large-scale processing.
- Refrain from disclosing data to unauthorized parties or transferring data cross-border without CIB Kenya's written approval and subject to legal safeguards.

Regulatory and Legal Compliance

Under CBK PG/16, third parties involved in material outsourcing arrangements must implement safeguards to maintain confidentiality, integrity, and availability of bank data. In addition, CIB Kenya is subject to mandatory breach reporting timelines under Kenya's Data Protection Act and is required to enforce equivalent obligations on its Third Parties.

Failure by a third party to meet these requirements could result in:

- Termination of the relationship.
- Reporting to CBK or the Office of the Data Protection Commissioner (ODPC).
- Legal liability or reputational damage.

Zero Tolerance for Lapses

CIB Kenya maintains zero tolerance for negligence, willful misconduct including financial crime and fraud, or systemic failures in third-party information security. Cybersecurity incidents, regardless of scale, must be treated with urgency, transparency, and full cooperation.

The Bank reserves the right to conduct security due diligence, audits, or site visits to assess compliance, and to request remediation or reassessment where gaps are identified.

Inter-Group Outsourcing

As a wholly owned subsidiary of CIB Egypt, CIB Kenya may access services under group-level outsourcing arrangements where CIB Egypt enters into contractual agreements with Third Parties on behalf of the Group.

These arrangements, termed inter-group outsourcing, allow CIB Kenya to benefit from specialized services at preferential rates or no cost, leveraging group synergies and economies of scale.

Despite the agreements being initiated and managed by the Group, CIB Kenya remains fully accountable for the regulatory compliance, performance oversight, and risk management of any services it consumes locally.

To ensure appropriate governance, the following principles apply:

- Local Compliance
- Internal Oversight
- Documentation & Visibility
- Risk Ownership
- Clear Governance
- Ongoing Monitoring

This approach ensures that full accountability and transparency is maintained in line with local regulatory expectations and risk management best practices.

Conduct Risk & Customer Rights Protection

At CIB Kenya, fair treatment of customers and protection of their rights is a cornerstone of responsible banking. Third parties are expected to uphold the same high standards of integrity, transparency, and accountability that define our customer relationships.

What Is Conduct Risk?

Conduct risk refers to the risk of improper, unethical, or unfair behavior by a Third Party that may lead to customer harm, regulatory breaches, or reputational damage. This includes misrepresentation of products, lack of transparency, aggressive sales tactics, or failure to resolve complaints effectively.

CIB Kenya's Expectations for Third Parties

When acting on behalf of the Bank, whether directly engaging with customers or supporting back-end operations, third parties are expected to:

- Treat customers fairly and respectfully, with dignity and without discrimination.
- Provide honest, complete, and clear information, especially on pricing, terms, risks, and customer obligations.
- Avoid misleading, deceptive, or high-pressure sales practices.
- Respect customer confidentiality, especially in handling personal data and account information.
- Handle complaints promptly and effectively, in accordance with defined escalation procedures.
- Ensure inclusive and accessible services, especially for vulnerable or underserved customers.
- Timely disclose and escalate any complaint raised against them in providing services to the bank customers.

Regulatory Compliance

These expectations are aligned with:

- The Central Bank of Kenya (CBK) Consumer Protection Guidelines, which require institutions and their agents to ensure fair disclosure, transparency, and redress mechanisms.
- The Kenya Data Protection Act, which mandates fair processing of customer data, informed consent, and privacy safeguards.
- CIB Kenya's own Code of Conduct and Customer Experience Standards, which apply to all employees, agents, and third parties.

Consequences of Breach

Failure to adhere to CIB Kenya's standards on conduct and customer protection, whether through unethical practices, misuse of customer information, misleading communication, or unfair treatment, may lead to:

- Immediate termination of the contractual relationship.
- Regulatory sanctions or penalties, in line with CBK and Data Protection laws.
- Reputational damage to both the third party and CIB Kenya.
- Exclusion from future business opportunities with the Bank.

CIB Kenya reserves the right to take appropriate legal or remedial action where necessary to safeguard its customers and institutional integrity.

Partnering for Responsible Banking

At CIB Kenya, we view our third parties as extensions of our brand and values. By upholding customer rights and adhering to the highest standards of ethical conduct, our partners play a vital role in fostering trust, loyalty, and long-term customer satisfaction.

Together, we are building a responsible banking environment grounded in integrity, professionalism, compliance, and shared accountability, ensuring that every customer interaction reflects our collective commitment to excellence.

Training and Awareness



At CIB Kenya, we believe that knowledge is a cornerstone of effective risk management and service excellence.

As such, we are committed to promoting a culture of continuous learning that extends beyond our internal teams to include all third-party and outsourced personnel engaged in delivering services on our behalf.

Commitment to Capability Building

We expect our third parties to ensure their staff receive relevant, up-to-date training that supports:

- Compliance with legal and regulatory obligations, including CBK Prudential Guidelines (e.g., PG/16), Data Protection Act, AML/CFT laws, and consumer protection standards.
- Adherence to CIB Kenya's internal policies, codes of conduct, and service-level expectations.
- Understanding of operational, cybersecurity, ESG, and reputational risks associated with their role.

Minimum Expectations

Third parties must:

- Maintain and provide evidence of staff training.
- Ensure that staff deployed are qualified, well-informed, and periodically refreshed on emerging risks.
- Participate in joint training, briefings, or compliance sensitization sessions where relevant.

The shared learning aims to foster an ecosystem of competent, responsible partners who contribute to risk-resilient operations and regulatory compliance.

Speak up!



Whistleblowing and Ethical Reporting:

Commercial International Bank (CIB) Kenya Limited is committed to the highest standards of ethics and integrity in the way it conducts business and takes very seriously any form of malpractice that is uncovered.

We understand that this is crucial to our continued success and sound reputation. Our Shared Values, Code of Conduct, and Policies guide our everyday conduct. We acknowledge our professional responsibility to speak up and report unethical behavior and encourage employees, stakeholders, and any other persons with concerns about any aspect of the Bank's operations to come forth and raise their concerns.

“Unacceptable Reportable Conduct” constitutes:

Confirmed or suspected current, previous, or future incident(s) that undermine or jeopardize the mission or reputation of the Bank and its stakeholders. For example:

- Misconduct or improper / unethical behavior.
- Conduct that constitutes a breach of law or any regulatory requirements.
- A conduct that represents a danger to the public, or the financial system.
- Offering or accepting of a gift to induce a decision in-favor of the Third Party or other parties.

How to Report a Concern:

You may report any confirmed or suspected misconduct to the following addresses/number either anonymously or by identifying yourself. Be assured the Bank will maintain utmost confidentiality.

- Email: whistleblower@cibke.com
- Phone: +254 709 063 633
- Website: <https://cibke.com/whistleblowing/>
- Send registered mail to the following address:
CIB Kenya Limited
P.O. Box 2051-00606, Sarit Centre, Nairobi, Kenya
To the attention of:
Head of Compliance

These channels are available 24 hours a day, 365 days a year.

Why It Matters

Raising concerns helps CIB Kenya:

- Detect and address issues early.
- Ensure ongoing compliance with CBK Prudential Guidelines (e.g., PG/16), the Data Protection Act, Anti-Corruption laws, and other applicable regulations.
- Strengthen ethical partnerships based on transparency and accountability.

We rely on you, our trusted partners, to help uphold our values and protect the integrity of our shared work.

Together, we create a culture where integrity is not just expected, but actively safeguarded.

CIB Kenya appreciates your vital role in our third-party risk program. This handbook is a practical guide to our partnership, setting clear expectations and supporting compliance with regulatory and internal standards.

If you have any questions, suggestions, or feedback regarding this handbook or your partnership with CIB Kenya, we welcome you to reach out through the following official channels:

- Email: contactus@cibke.com
- Phone: **+254 703 053 100**
- Mailing Address:
CIB Kenya Limited
1st Floor, The Address, Muthangari Drive,
Off Waiyaki Way, Westlands,
P.O. Box 2051-00606, Sarit Centre, Nairobi, Kenya
- Website: <https://cibke.com/>

Social Media

You may also reach out or follow us via our official social media pages. If you're contacting us through these platforms, kindly include your Company Name and indicate that you're a CIB Kenya Third Party:

-  <https://www.facebook.com/cibkenya/>
-  <https://www.instagram.com/cibkenya/>
-  <https://www.linkedin.com/company/cib-kenya-ltd/>
-  https://x.com/CIB_Kenya

Together, we are creating responsible and transparent partnerships that support our shared values of trust, compliance, innovation, and long-term success.

Warm regards,

CIB Kenya Team