



**Bank Alfalah**

**CODE OF CONDUCT - ETHICS AND  
BUSINESS PRACTICES**

## Contents

---

<b>Topic</b>	<b>Page</b>
Objectives	3
Annual Re-commitment	3
Standards	3
Overall Responsibility of Employees	3
General Guidelines	4
Confidential Information	4
Recording of Information	5
Conflict of Interest	5
Mis-declaration	6
Notification of Malpractice	6
Know Your Customer, Vendors and Counter Parties	7
Gifts & Entertainment	7
Purchasing Activities	7
Advertising	8
Social Media Guidelines	8
Other Corporate Ethical Policies	8
Bribery, Misconduct and Other Illegal Activities	9
Money Laundering / Terrorism Financing / Proliferation Financing	10
Offences & Punishment	10
Equal Employment Opportunity	10
Insider Trading	10
Outside Pressure	10
Commitment to Fairness	11
Copyright	11
Computer, Email and Internet Usage	11
Outside Employment	11
Dress Code / Grooming	12
Code's Guidance	12
Undertaking	12

**OBJECTIVES**

The objective of this document is to make and project the Bank as a professionally run and successfully managed profitable Bank with high standards, morals and ethics and recognized so by others within and outside the country. To achieve the above objective, all the employees of the Bank must fully comprehend and follow the standards of ethics and business practices.

The Bank expects from each employee to conduct themselves in accordance with the high standards of personal and professional integrity and to comply with all laws, regulations and corporate policies and procedure. This Code provides, in general, clarity to all employees of the Bank, the conduct expected in the performance of duties and the accountability for non-adherence to the Code.

Bank's employees are urged to read, understand and adhere to all the Bank's policies that relate to the sanctions of this Code.

**ANNUAL RE-COMMITMENT**

Every year, Human Capital Group will circulate the Bank's Code of Conduct - Ethics and Business Practices along with an undertaking to all of its employees. In order to reiterate and ensure compliance of the Bank's Code of Conduct, the employees are required to sign and give affirmation that they have reviewed, understood and agree to adhere to this Code annually.

Any clear infractions of the points mentioned in this document will be subject to disciplinary action, which may include reprimand, stoppage of increment / bonus / ASPIRE / promotion, demotion, termination of services or dismissal, depending on the seriousness of the offense. In addition, disciplinary measure will apply to any supervisor who directs or approves infractions or has knowledge of them and does not act promptly to correct them in accordance with this statement.

**STANDARDS**

Summarized below are standards to further escalate that each employee of the Bank Alfalah's family understands what is expected from him / her in carrying out daily Banking/employment activities and conduct outside of employment impacting Bank Alfalah. These standards must always be upheld in day-to-day activities of each individual employee.

The standard of business conduct and ethics, which the Bank expects from all of its employees, is a condition of employment with the Bank to be reviewed annually at the time of performance appraisal of an employee.

**OVERALL RESPONSIBILITY OF EMPLOYEES**

Each employee of the Bank has a responsibility to:

- Conduct Bank's business with honesty, integrity and professionalism.
- Avoid any action that may be viewed or be repugnant, unethical or unlawful on his / her part by the customer / public at large or the Bank itself.
- To understand and comply with the legal/regulatory requirements and internal policies and procedures of the Bank that apply to the duties assigned to the employee.
- Avoid any activities that could involve or lead to involvement in any unlawful act and/or unethical governance practice. If an employee comes to know any glitch of a system, he/she must report it immediately to his/her line management and Human Capital Group. The Bank has zero tolerance for those who exploit system glitches for their interests monetary or otherwise.
- Avoid participation in any political or subversive activities and abstain from gambling, betting and wagering contracts; or obtain prior permission from the Management for any level of involvement in political activities such as acceptance of any significant post in any political party or participation in Political Party's internal Elections for a significant position or participation in General/Local Bodies Elections during employment with the Bank. If such permission is not granted by the Human Capital Group or CEO then the employee has to refrain from/discontinue aforesaid political activities.
- Personal conduct towards the Bank, the other employees and customers of the Bank should be exemplary and he/she is expected to behave with decorum both during office hours and at other times.

- Safeguard the confidential information of the Bank and its customers. No customer information is to be used for personal gains.
- Avoid actual or potential conflicts of interests in transactions on behalf of the Bank.
- Provide accurate and reliable information in all personal records submitted to the Bank.
- Promptly report to the Bank any violation of laws and/or any policies of the Bank that come to the employees' attention.
- Promptly inform the Bank (through immediate senior or the Human Capital Group) if the employee is made party to any legal proceedings/disputes of any criminal nature and/or any civil nature having impact on the reputation/good will of the Bank.
- Judicious use of the Bank's available resources.
- Avoid personal/business financial transaction(s) with customer(s)/ borrower(s) of the Bank as the same would be a source of conflict of interest.

The Executives of the Bank i.e. Key Executives (as defined in SBP's Corporate Governance Regulatory Framework) and other employees of the Bank in the grades SEVP-I & SEVP-II are required to immediately notify in writing, any transaction taken by them or their spouses/minor children directly or indirectly in the shares of the Bank to the Company Secretary at the group email ID [companysecretariat@bankalfalah.com](mailto:companysecretariat@bankalfalah.com). They will also deliver original written record along with broker's invoice/confirmation of sale/purchase of shares through above email or by courier or by hand delivery to the office of the Company Secretary.

## GENERAL GUIDELINES

### 1. CONFIDENTIAL INFORMATION

During the course of employment and after its termination for whatever reason, the employee must not disclose to anyone (nor use for any purpose other than the business of the Bank) any information relating to the Bank or its employees which is not already available to the public, unless authorized to do so. Such information includes customer data, product manuals, technical secrets, and confidential research work, technical processes, operating manuals, marketing plans and strategies and other confidential financial or business information of the Bank.

The confidentiality of non-Banking information must also be respected regardless of how an employee comes across it. If an employee receives or holds information which he/she knows or believes is confidential to another person/organization, e.g. a competitor or former employer, he/she should not use that information or disclose it to anyone else in the Bank. The distinction between confidential information which should be treated in this way and other non-protected information is not always clear. If in doubt, consult Human Capital Group.

The employee will not trade in relevant investments or indulge in giving tips to another person or dealing on behalf of relatives, friends or any other third parties, whilst in possession of non-public price sensitive information. Irrespective of the fact whether you receive the information through your work or from any other source, you are advised not to engage in insider trading in securities.

The employees of the bank are strictly prohibited to disclose the fact to the customer or any other quarter that a suspicious transaction or related information is being or has been reported to any authority, except if required by law.

Confidential information concerning a customer or a supplier must never be disclosed to a third party except pursuant to a statute or regulation, or a court order or other legal process, or after receiving consent of the customer or supplier in writing.

Likewise, proprietary Bank Alfalah information i.e. confidential information about Bank's business or business plans, products and services, marketing methods, technology or systems, must never be disclosed to a third party except pursuant to a statute or regulation, or a valid court order.

For these purposes, "confidential information" is non-public information about Bank Alfalah or a customer or supplier that would be useful to a competitor or important to an investor in deciding whether to purchase, hold or sell any Bank Alfalah shares, or the shares of a customer or supplier.

All employees must categorically note that restrictions to disclose confidential information are not meant to stop employees from reporting or escalating any concerns or giving replies to requests or queries by regulatory bodies, auditors, tax consultants, law enforcement agencies or courts. However, such disclosures will be made with the necessary approvals of Departmental Head, Divisional Head or Group Head.

The employees of the Bank shall not only abide by the Bank's policies, local laws and regulations but also stand firmly against the activities of groups and/or individuals who unlawfully threaten public order and safety.

## **2. RECORDING OF INFORMATION**

No unrecorded fund or assets of the Bank shall be established or maintained for any reason. No false, artificial or misleading entries in the books and records of Bank shall be made for any reason. All reporting of information should be accurate, honest and timely and should be a fair representation of the facts.

## **3. CONFLICT OF INTEREST**

In order to implement the best corporate & ethical practices in the Bank, it is the responsibility of all employees as well as stakeholders at Bank to remain compliant with the Bank's Code of Conduct – Ethics & Business Practices, specifically, the Conflict of Interest. Any failure to adhere to these may attract penal consequences including initiation of disciplinary action against such employee/stakeholder.

Every employee is required to disclose the conflict of interest (if any) in terms of following points prescribed on the requisite forms, wherever, available or otherwise:

A conflict of interest includes situations where an employee permits the prospect of direct or indirect personal gain to influence his/her judgment or actions or more generally, when he/she favors someone else's interest over that of the Bank's or any customer of the Bank in the conduct of Bank's business. It also includes where an employee goes an extra mile to accommodate or give some financial or other benefit to his/her relative(s) without proper disclosure, by using his/her discretion unjustifiably or by compromising on any stipulation of any policy he/she is required to follow.

An employee may not hold any position, whether for gain or otherwise, of director, consultant, employee, representative or agent with any supplier, competitor or organization either doing or seeking to do business with Bank without prior written approval / consent of the Bank's Central Management Committee, CEO or Board of Directors. Similarly, if any immediate family member (close relative) as defined in HR Manual of any employee of the Bank holds a position with any organization doing or seeking to do business with the Bank, a written disclosure must be made promptly by such employee to his/her manager/Human Capital Group.

An employee may not hold interest in any organization doing business with the Bank unless it is a company/establishment quoted on a Stock Exchange and the interest is less than 1%, without the written consent of his / her manager.

If any employee wishes to undertake a non-executive directorship, trusteeship or supervisory position with any external organizations, the employee must obtain the consent of the Central Management Committee, Chief Human Resources Officer, the CEO or Board of Directors. In considering any such requests, the following factors will normally be taken into consideration:

- 3.1** The amount of time required to fully discharge the duties of the position, particularly any periods required during normal working hours.
- 3.2** Employee's current workload and performance level- Permission will not be given if it is envisaged that the extra responsibilities will impair the employee's ability to perform his/her role in the Bank or affect his/her health.
- 3.3** Permission may be refused if the appointment is considered to be commercially, politically sensitive or exposes the Bank or the employee to charges of commercial indiscretion.

- 3.4** The potential within the position for development of key competencies, should be valuable to the employee or the Bank.

In the event that consent is obtained, any remuneration received for work carried out can be retained by the said employee of the Bank.

#### **DISCLOSURE OF CLOSE/BLOOD RELATIVES**

The Bank does not prohibit employment of Close or Blood Relatives of current employees, provided that they meet required eligibility criteria and no conflict of interest is likely to arise. All employees of Bank Alfalah are required to declare their close / blood relatives working in the Bank or involved in any capacity as vendor, consultant, broker or service provider offering services to Bank Alfalah.

The following shall be considered as Close / Blood relatives:

Father	Brother's Son	Husband's Sister	Daughter
Father's Brother	Brother's Daughter	Wife	Daughter's Husband
Father's Sister	Sister	Wife's Father	Daughter's Father in Law
1st Cousin Paternal	Sister's Husband	Wife's Mother	Daughter's Mother in Law
Mother	Sister's Son	Wife's Brother	Step Father
Mother's Brother	Sister's Daughter	Wife's Sister	Step Mother
Mother's Sister	Husband	Son	Step Brother
1st Cousin Maternal	Husband's Father	Son's Wife	Step Sister
Brother	Husband's Mother	Son's Father in Law	Step Son
Brother's Wife	Husband's Brother	Son's Mother in Law	Step Daughter

Conflict of interest arising from close / blood relatives may expose the Bank to material risk. Failure to timely disclose will be considered as a serious matter and may lead to disciplinary action.

#### **FINANCIAL RELATIONSHIP**

Financial relationships between employees should be avoided, as such relationships may become source of potential conflict of interest. However, in unavoidable circumstances, if employees wish to undertake any financial transaction, they will make sure that no conflict of interest arises.

Financial transactions are allowed between employees who are close/blood relatives, duly disclosed and obtained approval as prescribed under the HR Policy.

Sale/Purchase of goods between employees are allowed on arm-length relationship, which does not involve any regular sale and purchase.

However, prior to entering into such one-time transaction, approval from relevant line manager(s) is required. The Line Manager should assess all the aspects of potential conflict of interest, if any, to the transaction and give approval(s) accordingly.

#### **4. MIS-DECLARATION**

An employee shall not make any mis-declaration. A mis-declaration constitutes, amongst other reasons, the following examples:

- 4.1** An employee issuing an incorrect account statement, salary certificate or any other information for any customer or staff member.
- 4.2** An employee issuing a fake claim for reimbursement of any expenses.

#### **5. NOTIFICATION OF MALPRACTICE**

If an employee believes that someone has acted or may be acting improperly in contravention of the principles set out in the Bank's Code of Conduct, employees are encouraged to inform the Bank of these concerns. Such concerns may be over health and safety matters, financial malpractice, discrimination or unethical conduct.

The employee should raise concerns by surface mail or inter-office mail to the following address, marking the envelope CONFIDENTIAL:

**Group Head Audit & Inspection,**

Bank Alfalah

Address

Audit & Inspection Group

1st Floor, Shahdin Manzil

Shahrah-e-Quaid E Azam (Mall Road)

Lahore, Pakistan

Hotline / landline numbers: +92 21 36254850 & +92 21 37184850

Electronically send e-mails to [whistleblowing@bankalfalah.com](mailto:whistleblowing@bankalfalah.com)

The Bank will endeavor to maintain confidentiality in respect of all concerns raised. The Whistle Blowing Policy is available on the employee portal.

## **6. KNOW YOUR CUSTOMER, VENDORS AND COUNTER PARTIES**

In order to safeguard the Bank's reputation and integrity, it is not only necessary for employees to discipline their own actions, it is also necessary to be aware of the character and actions of customers, vendors and counter parties. Care must be exercised in selecting those with whom we deal, and each Bank Alfalah business must have processes in place for checking on the credit and character of customers, vendors and counter parties.

Employee must ensure that the Bank establishes relationship with only those individuals, businesses and entities who have sound reputation and whose true identity has been established. Employee should conduct maximum caution in opening new accounts and before opening ensure that due diligence steps are completed for identification and verification of the prospective customers as per guidelines provided in bank's AML/CFT Policy & relevant Procedures. The Bank shall take appropriate action against the staff delinquent in conducting proper KYC and CDD in absence of which it is exposed to the risk of fraudulent activities.

## **7. GIFTS & ENTERTAINMENT**

An Employee should never allow him/herself to be in a position whereby he/she might be deemed by others to have been influenced in making business decisions as a consequence of accepting a gift or hospitality. Following are the specific guidelines to be strictly followed:

- 7.1** Employees are not allowed to accept gifts from companies or individuals with whom the Bank does business. Examples are:
  - Kickbacks in cash from customers, suppliers or contractors / vendors
  - Foreign holidays or tours for non-business purposes/pleasure trips arranged/paid by customers, suppliers, contractors or business partners.
  - Gifts with commercial value of more than Rs. 20,000/- per item, from travel agents, hotels, or insurance companies.
- 7.2** Employees are allowed to accept/give only minor items not having a value of more than Rs. 20,000/- as gifts, such as small number of inexpensive items like calendars, books, diaries, desk pads and pens, sweets and chocolates, etc. Department Heads should be consulted if any doubts are encountered.
- 7.3** If the employees are offered gifts, other than minor items as listed above, they should politely but firmly decline them, referring to the Bank's policy, if necessary.
- 7.4** If gifts of amounts over Rs. 20,000/- are delivered at their houses or workplace and cannot be easily returned without incurring embarrassment, they must hand such gifts over to their respective immediate seniors/supervisors/Heads, who will consider the most appropriate ways of dealing with them in consultation with Human Capital Group.
- 7.5** Gifts from airlines arising from business travel such as travel bags, pens and toiletry sets will be allowed along with the accrual of air miles in appropriate schemes. Cash reimbursements or deals offering refund or free air tickets or lodging must be returned to the Bank making payment for the same.

## **8. PURCHASING ACTIVITIES**



The staff involved in purchasing Department is many times the first or perhaps the only Department with which a non-Banking person or group has contacts. It is, therefore, essential that all personnel who are directly or indirectly responsible for Bank's expenditure behave both professionally and ethically. The intent and appearance of unethical or compromising practice in relationships, actions, and communications must be avoided. Many times the way in which an outsider views this department/unit is the way they view the Bank as a whole.

The employee should never use his/her authority or office for personal gain and shall seek to uphold and promote the standing of the Bank and the Purchasing Department by maintaining a standard of integrity above reproach, in all of their business relationships both inside and outside the Bank.

#### **9. ADVERTISING**

Advertising staff, must also adhere to the highest standard of ethical conduct in interaction with vendors, advertising firms or newspaper agencies. The jobs entrusted must strictly conform to policies of the Bank in all related dealings.

Employee will be truthful in all advertisings and promotional efforts and shall publish only accurate information about the Bank's operation under valid authority as prescribed in Bank's policy. Any advertisement published on behalf of the Bank should be duly approved by the Marketing Department / Human Capital Group / Central Management Committee (CMC).

Employee will not give any interview on behalf of the bank or in his/ her official capacity in the print/electronic/social media or road talk shows or have his / her photographs displayed in any official capacity nor be allowed to participate or act in television/ stage plays or in any media or cinema without having permission from the Human Capital Group of the Bank.

#### **10. SOCIAL MEDIA GUIDELINES:**

- Employees should be aware that Bank Alfalah may observe content and information made available by them publicly through social media.
- Employees should use their best judgment and responsibility in posting material on public forums / websites / platforms that is neither inappropriate nor harmful to Bank Alfalah, its employees, customers, and public at large.
- Employees must refrain themselves from criticizing or using even implicitly inappropriate language against regulatory bodies on social media.
- Employees should abstain from using abusive language at all times.
- Although not an exhaustive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are abusive, defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment internally or externally or indirectly may impact Bank Alfalah's reputation.
- Employees should be aware of the effect their actions may have on their image, as well as Bank Alfalah's image. The information that employees post or publish may be public for a long time.
- If employees find/encounter a situation while using social media that threatens to become antagonistic, they should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
- Employees should get appropriate permission before they refer to or post images of current or former employees, members, vendors or suppliers, unless such use/posting is carried out on account of any personal acquaintance/familiarity/friendship between the persons involved and contains harmless content.
- Employees should state clearly that the views/opinions expressed are their own. They must speak/write in the singular first person.
- Employees should ensure factual accuracy of all material prior to posting.
- Employees should not speak/write on behalf of Bank Alfalah, and should use a disclaimer where required.

#### **11. OTHER CORPORATE ETHICAL POLICIES:**

Here are some other important corporate ethical policies and requirements:

- 11.1 An employee must obtain the consent from his/her Group Head, Chief Human Resources Officer or the CEO as the case may be, before submitting a work for publication or making a public speech/media presentation



- in any medium (print, electronic, social). Generally, approval will be granted if the above expands the Bank's interests and does not involve the disclosure of Bank Alfalah's confidential information.
- 11.2 Our internal ethical standards are the results of shared moral convictions. Rationales such as 'everyone in the market does it' or 'our competitors do it' cannot be countenanced as permitting deviations from our standards.
- 11.3 The employee will not indulge in any kind of harassment or intimidation whether committed by or against any senior/ junior, co-worker, customer, vendor or visitor. He/ She will not use language, written or spoken in intra-office communication(s) or communication(s) with any individual within or outside the office that may contain any statement or material that is offensive to others. He / she will not engage in any discrimination against an individual's race, colour, religion, gender, age, marital status, sexual orientation or disability and will comply with all applicable law in this regard.
- 11.4 The employees must abstain from buying, selling, exchanging, distributing, possessing, using or being under the influence of intoxicants or illegal drugs in the workplace.
- 11.5 The employees should observe high standards of attitude that include positive persona, body language, courteous and optimistic approach. Negative and unprofessional behavior should be avoided at all times. Employees are also expected to ensure conditions of their work places are maintained and organized.
- 11.6 Employees must be disciplined and responsible in the work they undertake by assessing potential risk associated thereto. It is expected that employees should not exceed their limits and authority and take decisions in compliance with Bank's policy and defined authority matrix.
- 11.7 The Bank has zero tolerance towards carrying/displaying arms/weapons by the employees in its premises. However, this restriction does not apply to security staff.
- 11.8 Each and every employee will ensure good attendance & punctuality, and demonstrate a consistently good record in this area. For any absence during working hours, he/ she will obtain prior permission of the immediate supervisor. In case of emergency, if it is not possible to obtain prior permission, necessary permission/ confirmation will be obtained from his/her supervisor within 24 hours.
- 11.9 In case of any changes in the relevant information of an employee, he/ she will immediately inform his/ her supervisor and input the same in the Bank's system for approval of the supervisor and onward communication to Human Capital Group of the Bank.
- 11.10 Compliance with laws, regulations and ethical standards is an important element of your obligations to our customers, our stockholders, the general public and other staff. It is essential to our success that we take compliance seriously. Each employee of the Bank should think of compliance as a personal responsibility and should be expected to be held accountable for all compliance-related activities.
- 11.11 Employees must refrain from both dealing in Virtual / Crypto Currency related transactions and investing in offshore foreign exchange trading, margin trading and contract for difference (CFD) trading by using websites/apps/platforms such as OctaFX, Easy Forex, etc. Further, employees are prohibited from facilitating customers / account holders in processing, using, trading, holding, transferring value, promoting and investment in Virtual Currency / Token. In case any such transaction / dealing is detected, employees must file internal Suspicious Transaction Reporting (STR) for further investigation and reporting to Financial Monitoring Unit (FMU).

## **12. BRIBERY, MISCONDUCT & OTHER ILLEGAL ACTIVITIES**

- 12.1 Employees must not give or accept bribes nor take part in any form of corruption. Apart from all other criminal offences under the applicable laws, an employee will be guilty of an offence, who, without lawful authority or reasonable excuse:
- solicits or accepts any advantage as an inducement or reward for doing or intending to commit any action in relation to the Bank's affairs or business;
  - shows or intends to show favors or disfavours to any person in relation to the Bank's affairs or business;
  - intends to deceive the Bank by using any receipt, account or other document which is false or erroneous or defective in any way and which to his knowledge is intended to mislead the Bank; or
  - commits any other illegal activity, defrauds the Bank and/or its customers.

- 12.2. In the event that the Bank and/or its customers/clients sustain any losses, damages and/or claims due to any illegal activity or any actions/inactions of employee in breach of this Code and/or any other policy of the Bank and the Bank's senior management/disciplinary action committee/other concerned authorized committee/inquiry determines such employee to be liable, the employees hereby agree that any such liability may be settled by the Bank by deducting any accounts of the employee maintained with the Bank, including salary account(s), gratuity fund and provident fund and all other end service benefits of the employees.
- 12.3. The Bank shall have a right to terminate the employment of any employee on immediate basis if he/she is found guilty, by any Court of Law/similar authority, of any criminal offence in accordance with the laws that may be applicable to such employee at the prevalent time.

### **13. MONEY LAUNDERING / TERRORISM FINANCING / PROLIFERATION FINANCING**

The Bank has set its priority not to become implicated, in any way, with individuals or firms involved in criminal activities, money laundering/terrorist financing activities, employees are expected to exercise maximum caution in this regard.

The employee should work with due care, diligence and know the customer, be vigilant for unusual circumstances and immediately report any suspicious activity to the Compliance Division for further guidance / necessary action. An employee must not be a part in conducting or facilitating any sort of unauthorized/ illegal money transfer service directly or indirectly.

Further, all employees are strictly advised not to provide any support, assistance and funding including charity / donation to the proscribed / designated entities and individuals listed under the consolidated lists available at the websites of United Nations Security Council (UNSC) Sanctions Committee and National Counter Terrorism Authority (NACTA), or to those who are known for their association with such entities and persons, whether under the proscribed / designated name or with a different name. If any employee is transpired to have any possible association or are in close proximity with Designated Person (DP) or Proscribed Person (PP) such that they are found maintaining accounts / are a mandate holder/ next of kin/ signatory or close relative; the Compliance Division CFT Desk shall be informed immediately to undertake the appropriate action.

In case any confusion arises or any clarity is required, the Compliance Division may be immediately contacted for detailed guidance. The non-compliance may lead to strict disciplinary and legal actions as per the law and the Bank's procedures.

### **14. OFFENCES & PUNISHMENT**

When an employee of the Bank commits a breach of the policies & processes, laws, regulations, discipline, Code of Conduct, and knowingly does something detrimental to the interest of the Bank, he/she may be subject to punishment which may range up to immediate termination / dismissal in accordance with the Bank's policy.

The Bank, in its sole discretion, shall determine what act or omission constitutes misconduct, breach of trust or negligence of duty.

### **15. EQUAL EMPLOYMENT OPPORTUNITY**

Bank Alfalah is an equal opportunity employer in hiring and promotion practices, benefits and compensations. The Bank does not discriminate against employees and job applicants based upon certain characteristics, such as age, race, color, gender, religion, and disability. We ensure to provide a professional atmosphere to all the employees and treat them with respect and dignity.

### **16. INSIDER TRADING**

An employee shall be liable to criminal and civil offence where he/she is found buying or selling a company's stock or other securities while in possession of Inside Information or disclose Inside Information to another person who then trades in securities. Hence, the employee having access to any "material information" should not make it public and refrain to disclose such information to within and outside the Bank.

### **17. OUTSIDE PRESSURE**

All employees must refrain from bringing in outside pressure / influence to attain personal gain within the organization. Any such attempt will be subject to strict disciplinary action.

### **18. COMMITMENT TO FAIRNESS**

To be fair, all employees must:

- respect the human rights, dignity and interests of all stakeholders including but not limited to colleagues, suppliers, competitors and customers;
- refrain from selling an unsuitable product without disclosing complete terms and conditions and charges (i.e. a product that does not meet the needs) to a client. As doing so is mis-selling and may expose the Bank to regulatory penalties, reputational damage and legal actions by customers;
- know enough about the products they are selling and about the customer (e.g. risk, appetite, objectives, finances and personal circumstances) to judge the effect, which those products will have and whether they will meet the customers' needs;
- make every effort to ensure that the client understands the product being offered and its risks;
- never attempt to acquire information regarding a competitor's business by disreputable means;
- provide accurate and objective evaluations of job effectiveness and performance of those they may supervise – (evaluations that relate to performance, transfer or promotional considerations); and
- ensure the appropriate distribution of job responsibilities and workload of those they may supervise.

Financial products and services are sophisticated tools and selling these products, calls for knowledge, skill and judgment. Therefore, employees must carefully follow the above mentioned points when selling a product/service to any client.

### **19. COPYRIGHT**

Employee will not make unauthorized copies, nor pass on to anyone outside the bank documents / material / information / policies/manuals, electronic and physical data or computer programs etc. Downloading or uploading the Bank's data without the prior approval from the respective Group Head is strictly prohibited. Any work that employees undertake for the bank is the sole property of the Bank and that should be kept secret. However, the information may be shared where required in course of work by auditors, tax Consultants, regulatory bodies etc. with the necessary approval of Departmental, Divisional Head or Group Head.

### **20. COMPUTER, EMAIL & INTERNET USAGE**

E-Mail and Internet usage is provided to those employees only, where their job assignment entails internet research / usage or internal / external communication.

The Bank Internet and e-mail access may not be used for transmitting, retrieving or storing of any communication of a defamatory, discriminatory or harassing nature or materials that are obscene or unsuitable. No messages with derogatory or inflammatory remarks about an individual's race, age, disability, religion, national origin, physical attributes or sexual preference will be transmitted. Harassment of any kind is prohibited. It is to be ensured that correspondence is only for official purposes.

Use of computer resources is strictly limited to business requirements. Employees should be aware that e-mails are not confidential and may be accessed for monitoring purposes. Any breach of IT security protocol that involves private business use or unsuitable material will be considered as a disciplinary matter.

Since employees are accountable for all activities created under their password, it is one of their core responsibilities not only to protect their passwords but also to never share them with others. Employees will not use their official identities on other platforms nor will they use the same passwords on public websites that are being used for official purpose. There is zero tolerance on sharing official credentials and accessing Proxy/VPN websites. If an employee is found involved in any violation, it will certainly constitute gross misconduct warranting a disciplinary action.

### **21. OUTSIDE EMPLOYMENT**

Employment with the Bank is and should be seen as a full-time occupation and for this reason other employment or business association shall not be taken up without the written consents of the Chief Human Resources Officer and the CEO.

For purpose of this section of the Code, “Outside employment of any kind” includes, but is not limited to, acting as an officer, employee, proprietor, partner, agent, independent contractor or advisor or any in similar capacity.

## **22. DRESS CODE / GROOMING**

Dress code for all male employees of the Bank is suit and necktie. However, they may wear national /smart casual dress on Fridays. Similarly, staff members of units not dealing directly with customers may attend office without jackets and neckties (business casual dress) on working Saturdays.

Female employees should dress elegantly keeping in mind cultural norms of the country where they are based, without being ostentatious.

Non-clerical staff i.e. messengers, security guards, office boys, machine operators, maintenance staff will always be in uniform.

## **23. CODE’S GUIDANCE**

To make a decision about the propriety of a particular action, whether or not it is covered specifically by this Bank’s Code of Conduct, an employee should ask himself/herself the following question, “Would I feel comfortable in explaining this action to my family or close friends or seeing my action reported on the front page of my local newspaper?” The Bank and employees are best served when the answer is an unqualified “Yes”.

## **UNDERTAKING**

I hereby confirm that I have read and understood the foregoing Statement of Code of Conduct - Ethics and Business Practices.

I agree to conduct all my duties in accordance with the standards outlined in this statement. I affirm to the best of my knowledge, information and belief that I have not been engaged in any behavior which is unacceptable under this statement. I further undertake that I am not aware of any possible conflict of interest as described in this statement.

**Signature:** \_\_\_\_\_ **Name:** \_\_\_\_\_

**Employee No.:** \_\_\_\_\_ **Designation:** \_\_\_\_\_

**Location:** \_\_\_\_\_ **Date:** \_\_\_\_\_