



PREMIUMTRUST BANK'S CODE OF PROFESSIONAL CONDUCT AND ETHICS POLICY

CONDUCT & COMPLIANCE GROUP

AUGUST 17TH, 2023



INTRODUCTION

This Code of Professional Conduct and Ethics serves as a guideline to the standards that should govern all our dealings with customers, suppliers, colleagues, and the general public. The Code does not cover every possible subject or potential situation but formulates the broad policies and principles that should guide us in our daily activities.



POLICIES GUIDING OUR CODE

- ❖ **THE GIFT POLICY & HONORARIUM PAYMENT GUIDELINES**
- ❖ **THE WHISTLEBLOWING POLICY**
- ❖ **THE CONFLICT-OF-INTEREST POLICY**
- ❖ **THE EMPLOYEE HANDBOOK**
- ❖ **THE DISCIPLINARY FRAMEWORK AND SANCTION GRID**
- ❖ **THE EMPLOYEE DATING POLICY**





ATTESTATION

All employees must attest that they have read, understood, and agreed to comply with the Code of Professional Conduct and Ethics. New Employees must also certify when they join the services of the Bank.

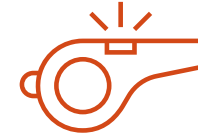


COMPLIANCE WITH THE CODE

All employees must comply with the Code of Professional Conduct and Ethics and all other corporate policies, as well as with all relevant laws and regulations.

Supervisors and managers must:

- a) Help their employees to understand and apply these values
- b) Maintain an environment that promotes consistent compliance.



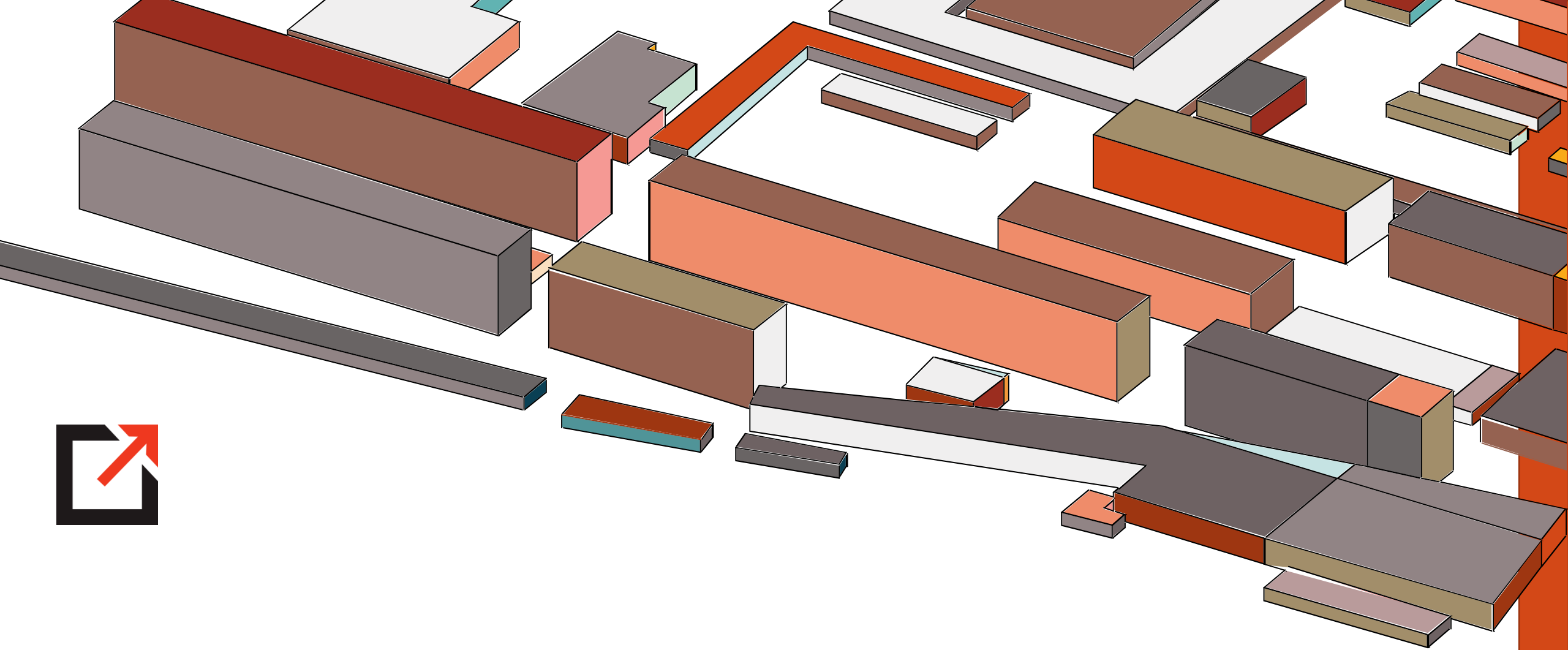
REPORTING ACTUAL & POTENTIAL VIOLATIONS

Report suspected violations to your supervisor, the Chief People Officer, or the Chief Compliance Officer. You can report via the Whistleblowing channel below:

E-mail:

WhistleBlowing@PremiumTrustBank.com





EMPLOYEE CODE OF CONDUCT

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WORKING HOURS

PremiumTrust Bank's official work hours are from 8:00 am to 5:00 pm, Monday to Friday, with a one-hour lunch break. The Bank, however, reserves the right to arrange work hours to accommodate crucial operational needs.



GENERAL BEHAVIOUR

Staff must maintain good personal conduct and cordial relations with all customers, other workers, and the public. They must also maintain a high level of integrity and decorum in their private conduct after office hours.

EMPLOYEE CODE OF CONDUCT



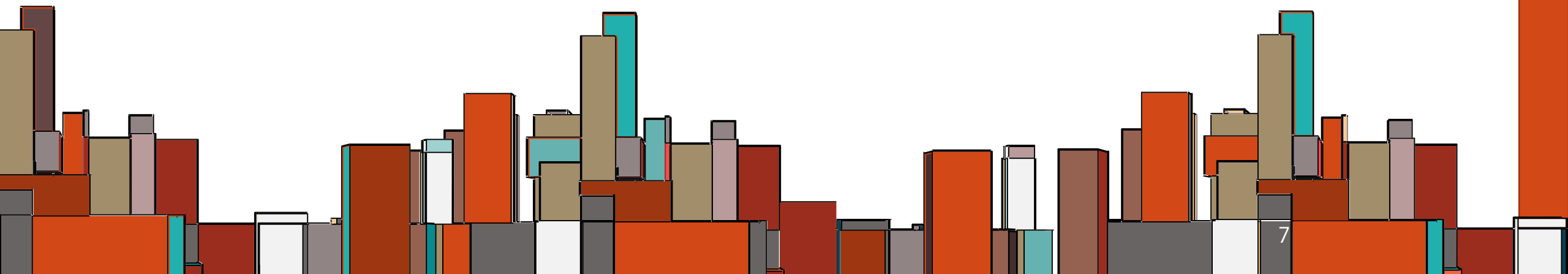
DRESS CODE

The details of the Dress Code are contained in our Employee Handbook. Decency, neatness, and professionalism are the watchwords.



ATTENDANCE & PUNCTUALITY

To have a well-functioning Bank, every employee is expected to be conscientious about punctuality and attendance.



EMPLOYEE CODE OF CONDUCT



BENEFITS FROM TRANSACTIONS

You are not expected to benefit from any official transaction between the Bank and its customers. Such transactions include but are not limited to advances, loans, or credit facilities granted by the Bank.



USE OF BANK'S ASSETS & DOCUMENTS

You shall be allowed to use the Bank's assets as stated in the bank's assets management policy. You will not use the Bank's name or official documents and stationery (e.g., letter-headed papers, official envelopes, etc.) for private purposes.

EMPLOYEE CODE OF CONDUCT



DAMAGE TO BANK'S PROPERTY

You should take adequate care to prevent loss or damage to the Bank's property entrusted to you. You will be liable to reimburse the Bank for any damage to its property in your possession caused by your negligence or willful act.



ACCEPTANCE OF GIFTS & GRATIFICATIONS

Staff members are not permitted to accept gifts from customers, or suppliers except calendars, diaries, or festive presents of an acceptable nature. However, if abrupt refusal would adversely affect the Bank's relationship with the customer/supplier, the employee should report receipt of the gift to the CPO.

EMPLOYEE CODE OF CONDUCT



CONFLICT OF INTEREST

You shall not put yourself in a situation or engage in an act that makes your personal interest conflict with that of the Bank. You should not be engaged in any other business or vocation, which will conflict or be prejudicial to the interest of the Bank.



SMOKING, DRUG & ALCOHOL ABUSE

The Bank promotes a smoke, alcohol, and drug-free environment. Imbibing alcohol or any other intoxicant while on duty is also strictly prohibited. Any confirmed use or abuse of these while on duty will lead to instant dismissal.

EMPLOYEE CODE OF CONDUCT



SAFETY AND SECURITY

You shall not put yourself in a situation or engage in an act that makes your personal interest conflict with that of the Bank. You should not be engaged in any other business or vocation, which will conflict or be prejudicial to the interest of the Bank.



OWNERSHIP RIGHTS: INFORMATION, REAL, PERSONAL & INTELLECTUAL PROPERTY

All confidential and/or proprietary information acquired in the course of employment with the Bank shall be considered to be the property of the Bank. No unauthorized use of such information shall be made by any employee of the Bank.

EMPLOYEE CODE OF CONDUCT



INTERNET AND E-MAIL

The internet and e-mail facilities provided by the Bank are for business use only. Messages composed, sent, or received on the Bank's electronic mail system remain the property of the Bank and may at any time be subject to review by the system administrators or the Management of the Bank.



CONFIDENTIAL INFORMATION

Confidential information will be regarded as any information about PremiumTrust Bank's business strategies and systems or clients, which if and when disclosed to the public, will result in harm to the Bank's market position, business objectives, or reputation.

EMPLOYEE CODE OF CONDUCT



PRIVATE MISCONDUCT

Although the Bank will not interfere in the private life of its staff, it will not be indifferent to the conduct of its staff in matters of their private interests, both financial and non-financial, especially as this may affect the Bank's reputation and security. Staff are therefore advised to always conduct their private affairs in such a way as to avoid financial and non-financial embarrassment.



CHEQUES

You should not issue invalid post-dated cheques or draw cheques in excess of your calculable bank balance(s). Violation of this rule is regarded as serious misconduct and sanctionable in line with the Bank's Centralized Disciplinary Process & Sanction Grid.

EMPLOYEE CODE OF CONDUCT



DISCLOSURE

You have the responsibility to disclose fully as soon as you become aware, of any matter which has become the subject of an official enquiry, investigation, or litigation, arising from your private activities while in the previous or current employment. Failure to do so will be regarded as serious misconduct.



PRESS INTERVIEW/PUBLICATIONS

You should not grant a press interview or publish an article or book in which there is a reference to the Bank's affairs or business, without prior written approval from the Bank.

EMPLOYEE CODE OF CONDUCT



WORKPLACE RELATIONSHIPS

You have the responsibility to disclose fully as soon as you become aware, of any matter which has become the subject of an official enquiry, investigation, or litigation, arising from your private activities while in the previous or current employment. Failure to do so will be regarded as serious misconduct.



UNAUTHORIZED TESTIMONIALS

You should not grant a press interview or publish an article or book in which there is a reference to the Bank's affairs or business, without prior written approval from the Bank.

EMPLOYEE CODE OF CONDUCT



POLITICAL ACTIVITIES

The Bank recognizes your right as an individual to participate in political activities. However, you should exercise such rights only in your private time, without compromising the Bank's position. If you wish to run for political office, you would be required to disengage from the services of the Bank to fulfill your aspirations.



CANVASSING, SOLICITING OR SELLING

Employees shall not engage in private activities for personal gain or any other unauthorized purpose while in the Bank nor may Bank's time or equipment be utilized for such purposes.

EMPLOYEE CODE OF CONDUCT



BORROWING, LENDING MONEY & GAMBLING

Managers or supervisors shall not borrow money from subordinates or have a subordinate act as an endorser or co-maker of a note given as security for a loan. Neither shall an employee lend money to any other employee (superior or peer) for the purpose of monetary profit or other gain.



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REIMBURSEMENT CLAIMS

You are entitled to reimbursement of all business expenses legitimately incurred in the course of your official duties. However, your expense claims should be reasonable, allowable in line with the Bank's policy and satisfactorily supported by receipts and other proof of expenditure as applicable.

EMPLOYEE CODE OF CONDUCT



MERCHANDISING ON BANK'S PREMISES

Employees who wish to merchandise goods and services on the Bank's premises must seek the People Management Group's written permission. It is important to note that this must not interfere with your primary duties, and the trade must be incompatible with the Bank's values, services, and products.



BULLYING AND HARASSMENT

At PremiumTrust Bank, we prohibit bullying and intimidation. You should escalate genuine cases to your supervisor, Directorate Head, the Chief People Officer, People Management Group, or use the Bank's Whistleblowing App.

EMPLOYEE CODE OF CONDUCT



WHISTLEBLOWING

If you observe any act of wrongdoing, it is your duty to either report to your supervisor, Group Head, Chief People Officer, the People Management Group or use the Bank's Whistle-blowing Channels. .



MINOR OFFENCES

Absence without approved leave, Incessant lateness to work, meetings without satisfactory explanation, violation of the Bank's Dress Code Policy, violation of Bank's general/telephone etiquette, Insubordination and a general negative attitude towards work, violation of safety rules/misuse/willful damage of Bank's property, etc.

EMPLOYEE CODE OF CONDUCT



MAJOR OFFENCES

Smoking/Drinking of alcohol during work hours and within the Bank's premises, Use of illegal drugs/Gambling, Exhibiting questionable character/Breaching the Professional Code of Conduct, Breaching Oath of Secrecy/Confidentiality agreement, Disclosure of password or usage of another party's password, Issuance of dud cheque(s) to other institutions or persons, rudeness to customers, rudeness to colleagues, Conflict of interest, Gross insubordination, fraud or misappropriation of funds, etc.



THANK YOU

Compiled by People Management Group