

# **POLICY ON INTERNAL CODE OF BUSINESS CONDUCT AND ETHICS**



## **Internal Code of Business Conduct and Ethics**

The CDB Code of Ethics and Professional Conduct outlines the fundamental principles that all employees of CDB are expected to follow, ensuring high standards of integrity and professionalism. It primarily addresses conflict of interest, corporate opportunities, confidentiality of information, fair dealing, protection and proper use of the Company's assets, compliance with applicable laws and regulations and the reporting of any illegal or unethical behavior.

### **General Conduct:**

Employees are required to behave professionally, maintain high ethical standards, and ensure the confidentiality of company information. They must avoid conflicts of interest and report any suspected unethical behavior.

### **Insider Trading and Information Security:**

The Code strictly prohibits insider trading and mandates responsible handling of sensitive information to prevent misuse. Employees involved in financial reporting are restricted from trading in company securities during specific periods.

### **Customer Relationships:**

Employees must act in good faith, ensuring products and services offered meet customers' needs. They must also maintain fairness when comparing products, and avoid any misrepresentation or improper advice.

### **Conflicts of Interest:**

Employees must disclose any potential conflicts that may impact their ability to perform their duties objectively, and they are prohibited from approving transactions involving themselves or family members without proper management approval.

### **Use of IT Resources:**

The Code governs the responsible use of Company IT assets, email, and internet, prohibiting misuse such as conducting personal business or sending offensive content.

Failure to comply with this Code may result in disciplinary action, and employees are encouraged to report any breaches. The Code fosters a culture of ethical behavior and compliance, ensuring that CDB operates with integrity and transparency.

Records of breaches of Code of Conduct are maintained and the breaches are addressed as per the set procedure. No waivers and exemptions are provided without Board approval. Human Resources Division with Management Committees and Board oversight ensures its implementation and monitoring mechanism with the assistance of Internal Audit.

The Code is made available to all employees and its provisions are included in the training programs. Confirmation on the understanding and adherence to the Code is obtained.

*Shareholders interested in obtaining this Policy may submit a written request to the Company Secretary, and the requested documents will be provided accordingly.*