# **Code Of Conduct & Ethics**

#### Introduction

This Code of Ethics / Conduct intends to ensure adherence to highest business and ethical standards while conducting the business of the Bank and compliance with the legal and regulatory requirements, including compliance of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules and regulations framed thereunder by the Securities and Exchange Commission of USA and other statutory and regulatory authorities in India and USA. The Bank values the ethical business standards very highly and intends adherence thereto in every segment of its business.

### **Applicability**

This Code of Ethics/Conduct is applicable to the following persons.

- The Board Members
- Officials of the Bank one level below the Board

#### **Ethical Conduct**

The Board members / Officials shall engage in and promote honest and ethical conduct of business, including the ethical handling of actual and / or apparent conflicts of interest between personal and professional relationships.

#### **Conflict of Interest**

The Board members / Officials shall avoid conflict of interest and disclose to the Board any material transaction or relationship that reasonably could be expected to give rise to such a conflict.

### **Confidentiality of Information**

The Board members / Officials shall ensure and take all reasonable measures to protect the confidentiality of non-public information about the Bank, its business, customers and other materially significant information obtained or created in connection with any activities with the Bank and to prevent the unauthorised disclosure of such information unless required by applicable laws or regulations or legal or regulatory process.

#### Disclosure of Information

The Board members / Officials shall endeavor to produce full, fair, accurate, timely and understandable disclosures in reports and documents that the Bank files with or submits to the Securities and Exchange Commission and other regulators and in other public communications made by the Bank.

### Compliance with Governmental Laws, Rules and Regulations

The Board members / Officials shall comply with all the applicable governmental laws and the applicable rules and regulations.

#### Variation of the Code and Waivers

The Code shall be reviewed from time to time for updation thereof. Any variation in the Code or any waivers from the provisions of the Code shall be approved by the Board and shall be disclosed on the Bank's website.

## **Contract or Term of Employment**

Nothing in this Code or other related communications by itself creates or implies an employment contract or terms of employment.

### **Violation of the Code**

The Board shall have the powers to take necessary action in case of any violation of the code.