

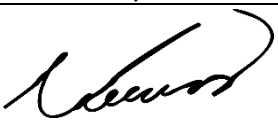


Know How We Maintain **Code of Conduct**



Eastern Bank Ltd.		Policy Number:	ebIHR- PMP-008
Title:	KNOW CODE OF CONDUCT		
Effective Date:	08 May, 2019		31 December, 2021
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Taking personal responsibility for our actions is critical to the success of EBL. People trust us to deliver on our promise to do business ethically and serve with high quality financial product and services. Our customers and employees expect us to operate in a safe and healthy environment that allow them to remain safe in EBL.

8.1 Who is subject to this code?

This code of conduct outlines the values, ethical principles and expected behaviors for all EBL employees. Each of us is expected to apply the Code of conduct and help others do the same. Each of us need to remember that Our daily decisions and actions affect our Brand and our colleagues, and can have an impact on the confidence placed on us by our stakeholders. Adherence to this Code is a condition of employment in EBL. Failure to comply it may result in disciplinary action up to and including immediate termination / dismissal.

8.2 Why Code of Conduct?

During our employment in EBL we need to ask ourselves the following questions before acting.

- Is my action legal?
- Is it in line with EBL values?
- It is not causing harm to others?
- Is it acceptable by EBL standard?
- It is not a breach of trust by myself with organization?

If any of the questions answered "No" then you need to refer this code of conduct before you continue with your activity and refer the matter to your line manager and / or ebIHR.

8.3 We respect:

- **8.3.1 Ensuring equal opportunity:** We are committed to equality of opportunity and treatment in our employment practices. We don't discriminate on broad range of grounds, including gender, sexual orientation, marital or civil partner status, gender reassignment, race, religion or belief, color, nationality, ethnic or national origin, disability or age. Our compensation and benefits policy is totally performance based. We treat people only on their contribution to the Bank and rewards are fairly distributed.
- **8.3.2 Diversity:** We are committed to increasing the diversity of our talent pool going forward and as part of initiatives in this area, we are updating our approach to recruitment activities to ensure we attract a diverse range of candidates, as well as promoting diversity through our internal training and development initiatives.
- **8.3.3 Dignity & Fair Treatment:** EBL employees must respect the dignity of colleagues and all others they come into contact with as part of their jobs. EBL treats all employees fairly and keep them informed about all the relevant changes with clear communication.
- **8.3.4 Friends and Relatives; Co-Worker Relationships:** Business and professional relationships with relatives, spouses, significant others or close friends can lead to a conflict of interest that can be difficult to resolve. If you are faced with the possibility of such a business or personal relationship you should discuss the matter with your manager.
- **8.3.5 Stakeholders:** We should be respectful and responsible towards our stakeholders at all time and everywhere we operate. We should show utmost integrity and honesty towards our stakeholders when it comes to giving them service, protecting their information, providing them with product knowledge, building relation, keeping their privacy and any other related activities. We can only disclose the records if advised by the court of law.
- **8.3.6 Protection of Customer & Other Banks/NBFIs Privacy and Records:** All the Employees of the Bank should maintain books and records with integrity, reflected in the accurate and timely manner of all transaction. We should not disclose any information of the Bank's plans, procedures, initiatives to anybody (including family, friends), unless advised by the court of law, without proper authorization. We should observe customer's privacy at all circumstances an at all times. An employee of the Bank may have access to information related to banks, customers, suppliers and current and former employees, as well as system- and bank-related information while performing official tasks. We shall not disclose/provide information of other institutions related to its performance, strategy, system, policies etc. to third parties without prior approval of competent authority.
- **8.3.7 Harassment, Discrimination and Bullying:** EBL prohibits harassment and bullying in any form – verbal, physical, or visual, as discussed in details in our People Management policy. An EBL employee must not demonstrate unwelcome and unsolicited behavior that a reasonable person would consider to be offensive, intimidating, humiliating or threatening.
- **8.3.8 Personal Questions:** We believe asking personal questions may make employees or customers uncomfortable. It is highly discouraged since others may feel troubled, embarrassed, and disturbed due to such inquiries. We must not upset our fellow colleagues or respectful customers by participating in such activities. We should not invade others privacy by asking awkward questions. However, if such situation or need arises where a customer or colleague want to share personal information, we should interact with utmost integrity and respect. Strict actions will be taken upon such behaviour/activity.
- **8.3.9 Speak up:** EBL is committed to the highest standards of openness, probity and accountability. We encourage colleagues to speak up if they suspect wrongdoing of any kind. When making a report, this must be done in good faith and not for the purposes of spreading false information or making a report with malicious intent. Please provide as much information and be as specific as possible so we can follow up efficiently. It is our

policy that retaliation is not permissible against any person raising a concern in good faith. Please refer to EBL employee speak up policy for details. However, if an employee does not speak up on occasions will be considered as the incident of concealment of facts that might result in disciplinary action.

8.4 We are ethical

- **8.4.1 Anti-Money Laundering:** Money Laundering legislations criminalize money laundering in respect of several crimes including drug trafficking, terrorism, theft, tax evasion, fraud, handling of stolen goods, counterfeiting and blackmail etc. it is also an offence to undertake and /or facilitate transactions with individuals and entities involved in criminal activities. EBL will not do business with drug traffickers, money launderers and other criminals.
- **8.4.2 Prevent Money Laundering and Transaction Structuring:** We must comply with local laws, regulations on money laundering and prevent fraud. We are not allowed to involve ourselves in any sort of money laundering activities and we must always keep our eyes open to detect any fraudulent activities in the Bank. We should follow the Bank's prudent guidelines while dealing in transaction with the customers. Any suspicious behavior of the customers, should be reported immediately. We have to know a customer's identity including their source of fund. We must examine the documents for their authenticity before giving our decision.
- **8.4.3 Signing a Contract:** Each time we enter into a business contract on EBL's behalf, there should be documentation recording that agreement, recommended/ approved by the Legal Unit, Internal Control and Compliance Department. We cannot sign any contract on behalf of EBL unless all of the following are met:
 - a) We are authorized to do so under our Signature Authority and Approval Policy. If we are unsure whether we are authorized, ask line manager.
 - b) If we are using an approved EBL form contract, we don't need further Legal approval unless we have made changes to the form contract or are using it for other than its intended purpose
 - c) We have studied the contract, understood its terms and decided that entering into the contract is in EBL's interest

All contracts at EBL should be in writing and should contain all of the relevant terms to which the parties are agreeing - EBL does not permit "side agreements," oral or written.
- **8.4.4 Bribery:** All payments made by the business must be warranted, transparent and proper. No payments may be made as a subterfuge for bribery. It is contrary to this code to offer, promise, authorize, pay or give, either directly or indirectly, to any other person (whether a government official or not) any financial or other advantage in order to secure an improper advantage, to obtain or retain business, or direct business to any other person or entity. Bribery is not at all acceptable and a punishable offense.
- **8.4.5 Borrowings:** An employee shall not borrow money from any customer or employee of the Bank or from person(s) likely to have dealings with the Bank or from any other money lenders.
We have to set our lifestyle in such a way that the need to borrow money from anyone.
- **8.4.6 Avoid Conflicts of Interest:** Employees must not use their position in the bank for personal gain or to obtain benefits for themselves and members of their families or friends. Employees who discharges citizenship responsibility through membership of public decision making bodies (school boards, society, recreational bodies etc.) should be alert to possible conflicts of interest and declare any such conflict.
- **8.4.7 Reporting Financial/ Accounting or any other Irregularities:** if there is any Financial/ Accounting or any other Irregularities please refer to our Speak up policy.
- **8.4.8 Third Parties and Suppliers:** We choose our third parties carefully and take appropriate measures to ensure they meet contractual requirements and follow the law,

our Code, and our policies. We evaluate potential third parties based on legitimate business criteria, such as: Safety, Needs, Cost, Quality, Services offered, Availability, Reputation and integrity. We treat third parties fairly and with integrity, avoid conflicts of interest, and even the appearance of impropriety. Just as it's important to protect EBL information, it's important we protect our third parties' confidential information and let them know that we expect them to protect ours.

- **8.4.9 Outside employment:** Employees are not allowed to be employed elsewhere while they are with the Bank as full- time employees. We are full time employees of the bank and are on duty for 24 hours. We are responsible to the office even we are not present at the office. Our deeds and actions during our absence from office should not be such that the action has an official impact. We may occasionally give services to Universities/ institutions but prior permission is required to avoid any unpleasant situation. We can provide community services but should not charge remunerations. We are not allowed to join the management of any company in order to avoid a conflict of interests.
- **8.4.10 Speculation in Stocks:** Employees and their dependents should not speculate/ trade in stocks, shares, securities or commodities of any description nor be connected with the formation or management of a joint- stock company. We are not allowed to involve ourselves in any business activities, such as trading of shares, securities and debentures. We are allowed to invest our savings into shares and apply for IPO. We will not allow our dependents to participate in any kind of speculative business.

8.5 We do what is right

- **8.5.1 Dealing with government/ regulatory officials:** All employees must deal with the government and regulatory officials with proper respect. Government and regulatory officers mean Ministry of Finance, Bangladesh Bank, National Board of Revenue, Bangladesh Security and Exchange Commission, Bangladesh Investment Development Authority and Comptroller and Auditor General of Bangladesh. If they are asking for any information then any employee should provide the information based on their job scope and authority; obviously in consultation with their line manager(s) and concerned authority.
- **8.5.2 Participation in Political Activities and External Pressure/Approach to Member of Parliament, Political Leader, Board Members, etc.:** An employee shall not directly or indirectly participate in any political activities during employment with the Bank. We should not donate any fund to political parties. We should not write or distribute political leaflet. We should not attend any political meeting even during holidays. Such activities may give rise to conflicts of interest.
No employee shall directly or indirectly approach any member of the Parliament or use any political or other type of influence or attempt to bring any influence of the Board of Directors of his/her organization for his/her employment, increment, promotion, transfer, or any other personal gain.
- **8.5.3 Representation to Directors:** An employee shall not make any personal representation to directors of the Bank. All representations must be addressed to the Managing Director through proper channel. We are not allowed to write any letter or appeal to the Directors of the Bank as long as we remain an employee of the Bank. We can write letters to our superiors; if we do not receive satisfactory results, we can apply to the Managing Director and his decision would be treated as final.
- **8.5.4 Discloser of relationship; Employment of relatives/ conflict of responsibilities:** If an employee of the Bank has authority to sanction loan and/or recommending power, if they have any direct relationship with any borrower of the Bank or the employee is otherwise interested in any loan/advance and other facility, etc. given by the Bank, the employee must disclose the information.

EBL rejects candidates on grounds of their relation to a current employee which may have a negative impact on productivity and trigger accusations of nepotism and favouritism. The word “relative” refers to any person who has a relation by blood or marriage within the 1st degree with our employee that includes parents, step-parents, grandparents, in-laws, spouses, children, step-children, adoptive children, grandchildren, siblings, uncles, aunts, nieces and nephews. However, people may become legal partners after joining in EBL – HR will ensure that they will not work in same reporting line. New recruits should disclose whether they have any relatives in the Bank and existing employees should notify HR if they plan to marry a fellow employee.

- **8.5.5 Alcoholism:** An employee must not consume alcoholic drinks during office hours. It is also expected that our employees will refrain from damaging the bank’s image/reputation when they engage themselves in social activities. We will abide by the country’s laws regarding the consumption of alcoholic products.
- **8.5.6 Drug Addiction:** An employee must not contemplate experimenting with drugs. Any evidence of Drug abuse of the employee’s part will result in prosecution. We will abide by the country’s laws concerned with the consumption of Drugs.
- **8.5.7 Non Smoking Workplace and Vehicle Pool:** EBL is a non-smoking workplace. Smoking in the premises will be a breach of conduct and the employee will be dealt accordingly. Employees are not allowed to smoke inside the pool vehicles. We will discourage our customers to smoke inside the branches, or any part of the EBL Head office premises. We will abide by the country’s laws regarding smoking.
- **8.5.8 Accepting Gifts, Entertainment, and Other Business Courtesies:** As a rule, gifts or services offered to an employee representing EBL should never exceed 2000 taka after a reasonable frequency. Apart from branded corporate gift items used for promotional purpose. Always remember that:
 - a) Gifts should never be accepted secretly.
 - b) Money should never be accepted as a gift.
 - c) Never accept gifts from stakeholders relating to business (i.e. customers, vendors).
 - d) Entertainment such as dinner invitations should never be extravagant and should always have acceptable business purpose.
 - e) Voyages and business trips should always have a legitimate business purpose and should never be accepted secretly.
 - f) It is not allowed to accept gifts given with the purpose of influencing upon a decision.
- **8.5.9 Habitual Lateness:** Habitual lateness is not acceptable in EBL and it is considered to be an offense. Habitually late people are considered to be non-performer also. Line managers should instantly talk to the concerned employee and counsel them for remedial action. If the employee continues to be late at office that will warrant immediate disciplinary action.
- **8.5.10 Unauthorized Absence:** Unauthorized absence should be notified to ebHR after 3 days of absence. Unauthorized absence is a terminable offense.
- **8.5.11 Procrastination:** Procrastination is defined as the habitual/intentional delay of starting or finishing a task despite its negative consequences. People should be aware about the degree of urgency and importance of their job. Procrastination might be interpreted as inefficiency at many cases which might result in poor performance. So, procrastination must be avoided unless it is at decision making level which might help the decision making process.
- **8.5.12 Concealment of fact:** Wilful action of concealment of fact or not informing an incident that might cause harm to the interest of EBL is a serious breach of code of conduct of EBL which might result in termination also.
- **8.5.13 Fair competition and anti-trust:** We are committed to doing business fairly, everywhere we operate. Always use good judgment and avoid agreements and discussions about competitive matters. Never make agreements that may create an unfair advantage

in the market, such as those to fix prices, divide customers, or prevent competitors from entering the market. Don't discuss competitively sensitive topics with competitors, such as price, contract terms, or marketing plans.

- **8.5.14 Terrorist activity or fundamentalism:** Bank will show zero tolerance to employee getting involved in terrorist activity or fundamentalism or any activity that is subversive to the Bank or nation.

8.6 We take care

- **8.6.1 Honesty and Integrity:** An employee must act honestly and with integrity all time. He/she must act fairly and equitably when dealing with the public, customer and other employee. We have to work with honesty and sincerity to uphold the image of Bank. We have to be very sincere and show honesty in dealing with our customers in order to win their trust. We should treat every customer, regardless of their race or class, fairly and equitably so that they cannot question our integrity at any time. We must set our standard of living as per our earnings.
- **8.6.2 Health & Safety:** Everyone deserves to work in a safe and secure workplace. That's why we maintain our workplace free of intimidation, threats, or acts of violence. We want to provide a safe work environment for everyone at EBL, including employees, customers, and visitors. We take our commitment to ensuring a safe and healthy workplace seriously and believe it's everyone's responsibility. Valuing the safety of our coworkers and customers as we would our own families.
- **8.6.3 Protecting Privacy, personal information and security:** We are asking customers to trust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. Our security procedures strictly limit access to and use of users' personal information, and require that each of us take measures to protect user data from unauthorized access. We follow privacy principles and strive to implement reasonable and appropriate practices in sharing of personal information about individuals. These principles and practices ensure that: Personal information can be used to support legitimate business purposes only and development processes for products and services.
- **8.6.4 Maintaining information security:** It is important that our products are safe for our customers, protect their data, and are designed with security in mind. As we develop and offer products and services, we understand the role of cybersecurity in protecting our customers, their data, and our bank. We shall focus on our customers and their data, so our products are safe and secure.
- **8.6.5 Intellectual Property:** EBL's Intellectual Property assets contribute to our ability to effectively conduct our business and to grow and achieve our business objectives. These assets include the ideas, new product plan or design, software, business information, financial data, technical information, trademarks, brands copyrights, Logo, applications, and all other proprietary information made for EBL or made by EBL employees.
- **8.6.6 Password sharing:** Any user ID and password provided by the Bank to any employee should be maintained with highest confidentiality. The user ID and password(s) are issued to authorized person for official purpose and to be used by the individual only. All employees of EBL must take all reasonable precautions to keep their used ID(s) and password(s) secure. Unauthorized user ID and password sharing is a terminable offense.
- **8.6.7 Customer Complaints:** All employees should give priority in resolving customer complaints quickly, fairly and record them accordingly. Employee must thank them for bringing the problem to them. Customer complaints should be handled with care and sincerity. We should allow the customers to vent their anger. We have to listen attentively to the customer's complaints with a positive frame of mind. We should exude empathy by responding to the customer's feelings. We should acknowledge the inconvenience caused to the customers by speaking politely. We should apologize if we are at fault. We will solve

the problem right away. If outside help is required, customers should be explained and time must be taken to resolve it.

- **8.6.8 Use of Corporate Name and Letterhead:** An employee should not use EBL's name, logo, corporate letterhead and seal for any purpose other than in the normal course of banking business. There's no way in which we can use these items for personal purpose. We must not keep the letterhead, official seal in an open space.
- **8.6.9 Use of Service Facilities:** An employee must ensure that Service facilities, equipment and vehicles are used efficiently and economically in the course of performing his or her duties. Unless authorized, a member must not use service facilities, equipment or vehicles for private or improper purposes except where such use is authorized by the Management. We should not use the pool car and official telephone for our personal purpose. We have to obtain prior permission for using official facilities after office hours or during holidays. We should take care of the facilities properly. We should do maintenance work regularly for smooth operation of the equipment under our control.
- **8.6.10 External Communications:** Everything we communicate about EBL can have an impact on our reputation, coworkers, and brand. We make sure the information we communicate is reliable, consistent, and accurate, which is why only certain people are authorized to speak on our bank's behalf. That's why it's important that you refrain from speaking on our bank's behalf unless you're authorized to do so. If you ever are contacted by the media about our bank, refer them to EBL Brand and Communications department.
- **8.6.11 Social Media:** Social media offers a great way to build relationships and exchange ideas. While we respect your right to use social media, use it in a way that's consistent with our values and policies. Follow the law and be aware that you are responsible for what you publish, so use good judgment. Understand that we never tolerate the use of social media to intimidate, harass, or discriminate against fellow employees.
- **8.6.12 Misrepresenting and Mis-selling the Bank's Product and Services:** All employee should be aware about the product and services the Bank provides and they should be careful when selling these products to the customers. Employees should comply with the rules and regulations on mis-selling and misrepresenting including advertising. We must not sell any product or services to customers that do not meet their needs or their interests. We should provide full range of information about the services and product to the customers so that they can take their decision based on merits. We must describe the pros and cons of the products including the complexity to the customers.
- **8.6.13 Workplace Violence:** Everyone deserves to work in a safe and secure workplace. That's why we maintain a workplace free of intimidation, threats, or acts of violence. As a bank, we work to provide a safe and secure workplace to our employees. We also do not tolerate conduct that harasses, disrupts, or interferes with another person's work performance or that creates an intimidating, offensive, or hostile environment.

8.7 Frequently Asked Questions

What if I am uncertain if an incident violates the Code of Conduct?

You should ask your line manager or eblHR for clarification.

What will happen to me if I file a report?

EBL encourages you to report suspected violations of the Code of Conduct. If you feel that you have been retaliated against, you can report this through eblHR.

My manager or supervisor has asked me to do something that I think is illegal or which violates the Code of Conduct. What should I do?

You should report the issue through eblHR.

I have seen some conduct at the office that I think is illegal but it is not addressed in the Code. What should I do?

If you suspect illegal behaviour, you should report it or talk with your supervisor or line manager about it. No Code of Conduct could possibly address every situation. The bottom line is that you have to exercise good judgment and high ethical standards at all times whether or not an issue is specifically addressed in the Code of Conduct.

I have been asked to serve as a consultant / trainer for one of our vendors during off hours. Can I do this?

Serving as a consultant for another company that does business with EBL or other Banks(s) can create a conflict of interest. Consequently, you must receive approval from EBL Management prior to agreeing to serve as a consultant or trainer. Raise the issue with your line manager, who will then take the issue to the appropriate authority for consideration.