



CODE OF CONDUCT FOR SENIOR MANAGERS

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Classification: Internal / Trusted Parties

Code of Conduct for Senior Managers:

For the purpose of this Code, “Senior Manager” shall mean members of management one level below the Managing Director/ Chief Executive Officer and includes Chief Financial Officer, Company Secretary, Head – Liabilities, Head – Assets, Head – Treasury, Head – HR, Chief Technology Officer, Head – Credit, Head – Compliance, Head – Risk, Head – Internal Audit, Head – Operations and such other employees of the Bank as may be identified by the Managing Director/ CEO from time to time.

The Senior Managers in consideration of their employment with the Bank are expected to devote their full time and attention to the business interests of the Bank. The Bank expects all Senior Managers to act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct while discharging their duties. Accordingly, Senior Managers are expected to read and understand this Code, uphold these standards in day to day activities, and comply with, all applicable laws, rules and regulations, and all applicable policies and procedures adopted by the Bank that govern conduct of its employees. Senior Managers should sign the acknowledgement at the end of this Code and return the same to HR department that they have received, read and understood and agree to comply with the Code

Senior Managers shall:

1. Always act in the best interests of the Bank;
2. Always act honestly, fairly, ethically and with integrity;
3. Refrain from using the Bank’s property or position for personal gain;
4. Refrain from using any information or opportunity received by them in their capacity as Senior Managers in a manner that would be detrimental to the Bank’s interests;
5. comply with all applicable laws, rules and regulations

A Senior Manager who has concerns regarding compliance with this Code should raise those concerns with the Managing Director, who will determine what action, shall be taken to deal with the concern.

Senior Manager’s duty demands that he or she should avoid and disclose all material, financial and commercial transactions that may have an actual and apparent conflict of interest.
