



ICB Islamic Bank Limited

a member of ICB Financial Group Holdings AG

CODE OF CONDUCT

July 18, 2018

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1.0 Preamble

The Code of Conduct sets the principles for the stakeholders- Members of the Board of Directors and its committees, employees of all levels and categories of ICB Islamic Bank Limited (ICBIBL), business partners and service providers and receivers to and from ICBIBL to keep uphold and promote the interests of this institution.

The principle objective of this set of Code of Conduct is to protect the interests of customers, owners and employees, stakeholders of ICBIBL as well as the counterparties, in addition to the wider interests of the society as a whole.

The ultimate objective of this Code of Conduct is to ensure integrity, high ethical standards, due skill, care and diligence in all of its business and allied activities, including the stakeholders. ICBIBL must take reasonable care and measures to organize, manage, and control its dealings and affairs responsibly and effectively, with adequate risk management systems and financial resources.

ICBIBL must effectively employ the resources, policies and procedures, processes, systems and control checks, including compliance checks and staff training that are necessary for compliance with and proper understanding of this Code of Conduct and that of its own.

Another objective of this Code of Conduct is to promote rationale behavior between/amongst ICBIBL's stakeholders. Practicing such Code of Conduct may also promote fair competition among institutions and strengthen the banking and financial environment in the country. This Code of Conduct is the minimum standard but not limited this instruction given.

2.0 Introduction

It is the universal principal of employment that whenever a person is recruited for employment, he or she shall abide by the corporation's Code of Conduct and ethical practice. Hence, all employees are expected to adhere to the highest possible ethical standards as laid down by the Bank.

ICBIBL's Code of Conduct is underpinned by the Code of Conduct set by Bangladesh Bank and as well as Company's Corporate Principles with which the Company aims to create and deliver consistently superior values to shareholders, customers, employee and communities.

Persons who work in ICBIBL as director, employee, advisor/consultant, and contractor/supplier or in any other form of stakeholder under legal or institutional provisions/arrangements must act with integrity i.e. in an honest, fair and legitimate way. Their activities must fully be customer service oriented and clearly be motivated by integrity and ethics, of course, in full conformity with the legal and regulatory requirements.

All Members of the Board of Directors of ICIBL and its committees, employees of all levels and categories of business partners and service providers and receivers to and from ICIBL will have to display the highest standards of professionalism and commitment to ethics and integrity in all of their conducts. It is also strongly expected that they all in every act and at all times would pay due respect, care and consideration to others and put the public interest first.

Board of Directors, members of different Committees and Management of ICIBL are individually and collectively remain committed and responsible to excel the practice of corporate governance principles and activities by placing due attention and weights on compliance of best ethical standards and integrity as recommended by the regulators to enhance our internal and external credibility and establishing transparency.

3.0 Stakeholders

3.1 Government and Regulators

- 3.1.1 Ministry of Finance (MOF);
- 3.1.2 Bangladesh Bank (BB);
- 3.1.3 National Board of Revenue (NBR);
- 3.1.4 Bangladesh Securities and Exchange Commission (BSEC);
- 3.1.5 Bangladesh Investment Development Authority (BIDA)
- 3.1.6 Comptroller and Auditor General of Bangladesh

3.2 Investors, Beneficiaries, Analysts/Researchers and External Auditors

- 3.2.1 Shareholders and market investors;
- 3.2.2 Business community, including chambers, associations and business clubs;
- 3.2.3 Rating agencies and the users of ratings;
- 3.2.4 Financial analysts/financial professionals;
- 3.2.5 External auditors

3.3 Customers and Clients

- 3.3.1 Customers and users of products and services;
- 3.3.2 Suppliers-both backward and forward linkages; and
- 3.3.3 Service providers and receivers of all categories.

3.4 Staff and Staff Associations/Clubs

- 3.4.1 Employees of all levels;

- 3.4.2 Welfare Associations;
- 3.4.3 Consumer Welfare Associations;
- 3.4.4 Other interest groups such as ethicists, environmentalists, gender welfare groups, etc.

3.5 Others

- 3.5.1 Civil society-elite groups;
- 3.5.2 Social media-print and electronic;
- 3.5.3 Authorities of related books and journals, and advertising agencies;
- 3.5.4 Brokers and dealers;
- 3.5.5 Whole sellers and retailers;
- 3.5.6 Agents and facilitators; and
- 3.5.7 Stockist and transport and courier companies.

4.0 Basic Professional and Institutional Obligations

For attaining and upholding public attention and customer and stakeholders' confidence, ICIBL ensures that each of our employees perform their assigned job with honesty and integrity, along with highest professional attitude and aptitude. Each member of all categories were confirmed their performance for the benefit of ICIBL and must avoid conflict of interest.

4.1 Code of Conduct for Employers

ICIBL has maintained a pleasant working environment across the company in terms of presence of well set and well-defined compensation package, clearly set goal orientation, as well as the performance-led for employees of all levels. ICIBL focuses on to make sure the scope of both professional and career development of the employees. Such an environment with well-designed strategic and logistic support would reinforce the satisfaction of the employees, which will ultimately make them loyal to the organization and its culture.

Working environment as well as procedures in ICIBL, is well designed and well maintained and we make it reasonably and promptly responsive to the customer needs, along with compliance with legal and regulatory requirements. Hence, our employees are well-trained and well-mannered in order for discharging their jobs efficiently, which will eventually enhance the goodwill of the company and thereby, expand the customer base and market share. Importantly, to motivate the employees towards the goals of the organization and enable them to perform to the best of their levels, responsibilities be clearly defined and carefully be allocated along with requirements and procedures for accountability and performance reporting and evaluation.

4.2 Some Specific Compliance Guidance of ICIBL

- 4.2.1 At all times the stakeholders will have to act in a professional and ethical way, and uphold the highest standards of honesty, trust, fairness, integrity and diligence;
- 4.2.2 Every stakeholders will consider the risks and implications of their actions and in principle, should feel accountable for them and for the potential adverse impacts;
- 4.2.3 ICIBL will take firm promise to comply with all current regulatory and legal requirements and adopt endeavor to follow best industry practices;
- 4.2.4 All information be used and handled with the best care and due diligence be applied to ensure the highest confidentiality and preserving sensitivity;
- 4.2.5 Prevent and avoid potential conflict of interest that arise and influence one whilst he/she performs;
- 4.2.6 All employees of ICIBL serve customers, colleagues and counterparties with due care. Respect their desires and serve them with responsibility if they asked for, or help them voluntarily;
- 4.2.7 ICIBL sets the service standard that reflects professionalism and that also expresses values and attitudes, as well as positive behaviors;
- 4.2.8 Equip employees to carry out their duties with due regards to the technical and professional standards expected by qualified customers. Encourage the staffs continuously to develop and maintain their technical and professional knowledge and level of competence; and
- 4.2.9 Train and encourage the staff to act with complete integrity towards customers, colleagues, counterparties and others with whom they may come into contact.

The ethical conduct of all employees of bank and the reputation of the profession depend largely on employees' approaches and attitudes at all levels. Standards of integrity, ethics and professionalism cannot be created or maintained by written rules alone; rather this depends upon the integrity and behavior of those engaged as professionals in the industry. ICIBL has adopted and upheld integrity and professional ethics in respective institutions and service standards.

4.3 Serving Customers and the Stakeholders

For ensuring standardized services and ethical business development, ICIBL has identified their existing and potential users, side by side with the selected service providers at various levels. Efficient and effective selection and categorization would enable ICIBL to make the proper business plan.

4.4 Service Provider

- 4.4.1 Analyze and determine customer base and review and understanding their needs effectively;
- 4.4.2 Add in and provide product and service excellence with integrity and sincerity;
- 4.4.3 Provide with secured and advanced facilities-products and services;

- 4.4.4 Be fair and well-committed in serving the customers and stakeholders;
- 4.4.5 All services sold or served to be passed - through the legal and regulatory processes; and
- 4.4.6 Each type of stakeholders' involvement and concern be clearly defined and understood.

4.5 Encouraging People with Knowledge and Skill Enhancement

- 4.5.1 Providing opportunities for professional development; and
- 4.5.2 Evaluating performance objectively;
- 4.5.3 Applying Banks' values & principles consistently

4.6 Delivering to Partners

- 4.6.1 Good corporate governance practices;
- 4.6.2 Protecting intellectual property;
- 4.6.3 Protecting reputation of ICBIBL; and
- 4.6.4 Strengthening competitive behavior.

4.7 Being Proactive

- 4.7.1 Anticipating and embracing changes;
- 4.7.2 Encouraging and rewarding innovation responsibly; and
- 4.7.3 Maintaining and sharing accurate and useful information.

4.8 Working in Teams

- 4.8.1 Remain individually and make others accountable for every action;
- 4.8.2 Refrain from favoritism and bias;
- 4.8.3 Extract value from different perspectives;
- 4.8.4 Work jointly and collectively; and
- 4.8.5 Acknowledge and appreciate value for both individual and team contributions.

4.9 Respecting Each Other and Reciprocity

- 4.9.1 Recognize and respect human dignity;
- 4.9.2 Establish a working environment free of harassment and intimidation;
- 4.9.3 Comply with social and occupational health & safety regulations; and
- 4.9.4 Protect organization from damage/loss of physical assets.

4.10 Guarding against Arrogance

- 4.10.1 Celebrate successes and achievements with modesty;
- 4.10.2 Meet the legitimate expectations of stakeholders; and
- 4.10.3 Express personal identity with dignity, courtesy and tolerance.

5.0 Responsibility

5.1 Responsibility to Shareholders

- 5.1.1 ICBIBL preserve the lawful benefits and interests of their shareholders;
- 5.1.2 Should make utmost endeavor to maximize profit and increase the payout ratio for the stakeholders; and
- 5.1.3 Should make best effort to maximize company profit and manage the same ethically and properly.

5.2 Responsibility to Customers

To satisfy the customers-needs efficiently, ICBIBL requires to:

- 5.2.1 Understand and honor the customer needs, as well as serve them indifferently, promptly and honestly;
- 5.2.2 Ensure complete secrecy of customers' affairs/account information at all times unless asked by any competent court or any other lawful authority;
- 5.2.3 Issue notice with reasonable time in case of closure of accounts for any legitimate reason(s);
- 5.2.4 Provide customers with requested account statement accurately and promptly;
- 5.2.5 Keep the customers updated regarding any suspicious operations in his account;
- 5.2.6 Exercise due diligence in operating of customer accounts; and
- 5.2.7 Keep customers fully informed of about all financial products.

5.3 Responsibility to Community/Society

ICBIBL complied with the recognized/established legal, regulatory, as well as social/community norms, customs and values.

5.4 Commitment to the Environment

Environmental and climatic protections are among the most pressing global challenges of the time. All of these are will take into account in all areas of lending/financing. Emphasizing on the areas of energy and climate change while lending, ICBIBL supports the process of sustainable economic growth of the country. ICBIBL will have to confirm commitment to choose and do the right things, along with the compliance and legal requirements. ICBIBL considers structural and non-traditional risks management options that inherent for financial activities side by side with the management traditional financial risks, such as credit risk, market risk and operational risk etc. Risks inherent to environmental and social activities also taken into consideration.

6.0 Property and Information of ICBIBL

6.1 Property of ICBIBL

Key responsibility of ICBIBL is to protect and safeguard its own property, not to use it for personal purposes use and abide by the followings-

- 6.1.1 Each employee of ICBIBL should follow the operational and IT security manual meticulously while using property of the organization;
- 6.1.2 He/she needs to ensure the fair value of assets while these are acquired and disposed of if an employee works as a member of asset acquiring/disposal committee;
- 6.1.3 He/she should not participate in the name of other people in the supplying of materials to ICBIBL or sell ICBIBL's old assets;
- 6.1.4 He/she should protect the pilfering of stationeries, stealing, embezzling or misappropriating money, funds;
- 6.1.5 He/she apply own judgment and ethical concerns in using organization's phones, electronic mail or computing systems for a personal requirement;
- 6.1.6 He/she should refrain from using the organization's Letter Head paper for personal correspondence.

6.2 Information Security

ICBIBL should take reasonable care to keep secure its information from unauthorized disclosure and exchange. Any confidential information it receives from clients or any details of the transactions of its clients should preserve with utmost security. Unless asked by any lawful and competent court/authority, exchanging or disclosing of information will treat as a serious violation of the ethical standard, and shall be treated as a breach of contract.

6.3 Invisible Property

- 6.3.1 An employee will not use the corporate brand and goodwill of ICBIBL for non-official purposes like taking house rent, renewal of car license, buying own flat and other assets.
- 6.3.2 It is forbidden to use official designation for any personal gain.

6.4 Intellectual Property of Others

An employee will be cautious about the intellectual property rights of others. For example, he/she will not provide performance report of one customer to other, not use the logo of the third party in purposes which are not allowed in the franchise agreement, not use the CIB report of the third party and refrain from plagiarism of other bank's credit analysis for personal gains or purposes.

6.5 Bank's Information

While performing the official task, each employee of ICBIBL may have access to information that is not generally available to the public or that are considered confidential for managerial or

administrative purposes. This may include information related to banks, customers, suppliers and current and former employees, as well as system and bank related information. He/she will not disclose this information unless authorized by competent authority.

Each employee of ICIBL will not provide any information to the third party without prior approval of competent authority. He/she shall not disclose the unpublished and sensible information of the company related to its performance, strategy, system, policies etc.

6.6 Customer Information

An employee will not accede to or use customer's information excepting related business purposes. He/she must protect the confidentiality and security of the information.

6.7 Information of Government Agencies'

Any information of govt. agencies like Anti-Corruption Commission (ACC), National Board of Revenue (NBR), Bangladesh Bank (BB), Bangladesh Securities and Exchange Commission (BSEC) etc. should not disclose without prior approval of competent authority.

6.8 Employee Information

An employee must keep all information of the organization, either current or old, secret and confidential.

6.9 Suppliers' Information

An employee must keep information about the purchase of goods or services confidential. Price quoted, methods, business policy etc. of the vendors should not be disclosed.

7.0 Use of Position

The officials in all positions of ICIBL will have to abide by their respective Code of Conduct for the sake of both institutional and national integrity. It is expected that an official will use his/her position and delegated power to do his/her jobs appropriately. Any deviations of this will treated as an abuse of position and power. Generally, such deviations are found out for following two reasons:

7.1 Private Gain:

An employee is supposed to exercise his/her power attributed to his/her position for the benefit of the institution as well as the country. But it becomes injurious and illegal if the exercise of his/her power relating to his/her position is led towards personal benefit. It is tantamount to corruption or misuse of power and position and it is quite contradictory to national integrity. Therefore, the use of the position of an employee in any institution for any private gain is strictly prohibited.

7.2 Endorsement:

The endorsement of one's position is also similar to the abuse of position. Sometimes, dignitaries may not directly take any benefit by using their power and position. However, they may pave the path for benefits for other persons by making such unlawful use and authorization of position and power.

The aim of a dignitary should serve the people or nation without bias. If any activity makes his/her own people benefited unusually and thereby frustrates the others, it shall be treated as partiality and nepotism. So, a dignitary will not involve in such activities.

8.0 Conflicts of Interest

8.1 The conflict of interest is often a very strong hurdle on the way of implementation of national integrity strategy. When an employee thinks of his/her personal interest from his/her official position, a question of conflict of interest arises. The statute allows him/her to serve his/her own gain, or interest at the cost of employing institution or the state. It is a statutory as well as an ethical obligation for an employee to keep himself/herself away from the personal interest. The apparent causes or reasons behind such a conflicting situation may include the followings:

- a. Dissatisfaction with salary and remunerations;
- b. Unpleasant working environment;
- c. Lack of opportunities for promotion, or deprivation from promotion;
- d. Undue influence and/or pressure from others;
- e. Greed to or from colleagues and employer; and
- f. Lack of job security.

8.2 Whatsoever the circumstances, the employees must avoid the conflict of interest as long as they hold positions in the organization. Availing any kind of undue or illegal benefit/facilities irrespective of forms will treat as the deviation from the required standard of services. So, to keep the employees refrained from such a trap of conflict of interest, employers might administer the employee affairs legally & ethically, and compensate them reasonably. An employee will have to refrain from doing the following:

- a. Performing his duties with a view to protect his own benefits at the cost of his employer.
- b. Involving in any kind of financial activities relating to his personal gain.
- c. Giving advice, consultancy, direction or suggestion to anybody or to any institution that

may cause losses to his employer;

- d. Any practice/exercise that may benefit him at the cost of institution's assets either monetary or non-monetary;
- e. Doing anything that may damage the goodwill, image and reputation of the institution;
- f. Doing anything that may hamper the secrecy and privacy of any affairs/information of the company;
- g. Involving or taking part in any business dealing like shareholding, profit sharing, partnership with any business company or manufacturing industry or servicing center for their personal benefit;
- h. Getting any unusual or illegitimate benefits directly, or indirectly for himself/herself and family members, and relatives either explicitly, or implicitly by disguising identity;
- i. Receiving any charitable contribution from others or make any charitable contribution to his family members and relatives if those charitable contributions are made by/under his power and position;
- j. Receiving any gift (in cash or kind) from those who are directly benefited or assisted by his office or by his power and position.

The above noted issues are least on the list, but not exhausted. Any unusual act makes/done by the employee(s) shall be considered within the trap of conflict of interest and be reviewed within the purview of offenses.

9.0 Engagement in Other Employment

An employee will not:

- a. Engage himself in any commercial activity or pursue such activity either on his own account or as agent of others;
- b. Engage in any other banking, financial business, work similar to work carried on by the Bank for reward or otherwise;
- c. Except with the consent of the CEO/COO accept office on Municipal Council, in Parliament any company or enterprise or public company whilst in the employment of the Bank;
- d. Accept any outside employment, honorary or stipendiary, without prior approval/consent of the Management of ICBI BL; and
- e. Undertake part-time work except those, which may request to accept or undertaken by the Management of ICBI BL.

10.0 Private Trade or Employment

10.1 Subject to the other provisions of this Code of conduct, no ICBI BL's employee shall, except with the previous permission of the Management of ICBI BL, engage in any trade or undertake any employment or work, other than his/her official duties.

10.2 Each employee of ICBI BL below officer rank may undertake/run a small enterprise which

absorbs only his/her family members. However, in such cases, he/she must inform this to the management of ICIBL along with the declaration of assets.

10.3 Each employee of ICIBL may undertake honorary work in social, religious or charitable organizations and also may engage in occasional work of a literary or artistic character/nature, which may include the publication of one or a few literary or artistic works, provided that his/her official duties do not hamper/suffer thereby. But ICIBL at any time may forbid him to undertake it or ask to abandon it if there exists valid reason/s to do so.

10.4 No employee shall trade or carry on any commercial business or transaction whatsoever for reward or otherwise on the premises of the Bank or any of its Branches.

10.5 No employee shall borrow money from; or in any way place himself under pecuniary obligation to a money lender, or another employee of the Bank, or any firm or person having dealings with the Bank.

10.6 Procedure for Applying in Outside Employment:

Eligible application of temporary or permanent employees of the ICIBL for outside employment will be dealt with on the basis of the following principles:-

- i. a) Application for appearing in the competitive examinations of Bangladesh Public Service Commission and in other government, semi-government entities/institutions including state-owned/specialized banks, private banks and other public/private entities/institutions shall be forwarded.

b) Applications for employment in International Organizations where Bangladesh is a member and for employment under Foreign Governments shall be forwarded provided that all such applications are processed through the concerned/competent channels of Government of Bangladesh.
- ii. Applications from all categories of employees for employment in the autonomous bodies including public and private university shall be forwarded.
- iii. Any application for outside employment which does not fulfill the above conditions shall not be forwarded.
- iv. In case of employment opportunities abroad, the applicants must pay their liabilities with ICIBL and thereafter, submit resignation letter abiding by concerned rules and regulations of ICIBL. When an employee is released for outside (foreign) employment and the question of lien arises, such an issue will be governed by the service rules of ICIBL. This would be followed both in cases of temporary and permanent foreign employment. ICIBL can depute it's any employee to any work or onshore/off-shore offices, branches, affiliated offices/institutions, subsidiaries and such placements/deputations might be governed by the service and/or other related rules.

10.7 Teaching, Speaking & Writing

An employee considering authorship or publication of a book, article etc. and speaking in front of the

media which is not commissioned by the organization but which could in any way be connected with their work or employment at the organization should seek guidance from the management through HR before entering into any commitment. Any publication or public speaking of an employee should not tarnish the image of the organization vis-à-vis regulatory bodies of the country. The same considerations apply to the publication of material on the world-wide-web and social media. No employee will make any communication regarding the affairs of ICBIBL to the press or any other media, nor publish any article containing data, comments, or opinions on ICBIBL, without obtaining prior approval of the Management of ICBIBL.

11.0 External Pressure/Approach to Member of Parliament, Political Leader, Board Members etc.

No employee shall, directly or indirectly, approach any member of Parliament or use any political or another type of influence or attempt to bring any influence of the Board of Directors of ICBIBL for his/her employment, increment, promotion, transfer or any other personal gain.

12.0 Acceptance of Gifts and Foreign Awards

This is highly discouraged to receive any gift from the client to avoid any unwanted circumstances. This policy should be clearly communicated to the clients. Even after that, if any client wants to provide any gift and if the employee believes that refusal will adversely affect the relationship, then that should be notified by the HR department without any difference. All the gifts received from the client will be distributed among the employee(s) in the following manner:

a. Local:

- i. If the cost of the gift seems to within Tk. 2,000/-, the gift may be handover to the concerned employee whom the client provide the gift with the consent of HR department.
- ii. If the client provides the gift to all employees of ICBIBL, HR department will handover that to the employees.

b. Foreign:

- i. If any gift is offered by the head or representative of a foreign state, ICBIBL employee should attempt to avoid acceptance of such a gift if, s/he can do so without giving offense. If, however, s/he cannot do so, s/he will receive the gift and shall report to the HR department of ICBIBL.
- ii. No employee of ICBIBL will receive a foreign award, title or honor without the approval of Management of ICBIBL.

13.0 Fair Treatment of Counter-parties

All relationships with external counter-parties should be conducted in professional and impartial manner. Vendor selection and hiring decisions will be made objectively and in the best interest of the organization based on the evaluation of integrity, suitability, price, delivery of goods/service, quality and other pertinent factors. An employee should commit to a fair contract and payment terms with them in return for good service at a good price supplied; in a responsible manner.

Employee's personal relationship with contractors, suppliers and vendors, if any will be disclosed to the Top Management at the time of entering into the negotiation and should not influence decisions made on behalf of ICIBL. Negotiations with customers and potential customers will be conducted in a professional manner and subsequently comparison of Cost & Benefit to be presented to the Management of ICIBL.

Vendors or suppliers will not be used for any personal purposes, so as to have any conflict of interest while dealing with them.

14.0 Anti-Money Laundering

Money Laundering legislation criminalizes 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 offense to undertake and/or facilitate transactions with individuals and entities involved in criminal activities.

ICIBL does not do business with drug traffickers, money launderers and other criminals. It will formulate Anti Money Laundering Policy following regulatory body's guidelines to enable all employees to follow the policy meticulously.

ICIBL Employees shall:

- I. Comply with all applicable laws and regulations contained in Bangladesh Bank Money Laundering and Fraud Prevention Guidelines & Circulations issued from time to time.
- II. Actively guard against the use of ICIBL products and services for the purposes of Money Laundering or for financing terrorism or criminal activities.
- III. Know Your Customer theme to be established by identifying them through reliable evidence.
- IV. Report suspicious activities immediately to the Management.
- V. Adhere to processes in place for checking the credit and character of customers and counter parties. These processes ensure customer's due diligence and ongoing monitoring of their customers to detect suspicious transactions during the entire period of the relationship.

- VI. Any other means as may be deemed appropriate and necessary for the purpose of preventing Money Laundering and Fraud.

15.0 Accuracy of Records and Reporting

ICBIBL's books, records, accounts and reports accurately reflect its transactions and an adequate system of internal controls and disclosure controls to promote the highest degree of integrity. Every employee will ensure that records, data and information owned, collected, used and managed by him/her for the ICBIBL are accurate and complete. Records will be maintained as per the policy of the organization in sufficient details so that these may reflect accurately on the ICBIBL's transactions.

Each employee will assist in the maintenance of appropriate records so as to ensure that financial transactions are prepared in accordance with Generally Accepted Accounting Principles (GAAP) and that they fairly present the financial conditions and result of ICBIBL. He/she will observe standards of good flavor regarding content and language when creating business records and other documents (such as weekly/ monthly/quarterly statement, e-mail etc.) that may be retained by ICBIBL.

Non-maintenance of these records that come into employee's notice and any misappropriation or tampering of records, needs to be reported to the relevant authority. An employee will not represent any report/claim for his/her personal gain or to protect him/herself.

16.0 Fraud, Theft or Illegal Activities

Employees will be vigilant about the frauds, theft or illegal activities and shall not engage in such activities at any cost. If any such activity comes into any employee's notice, he/she will immediately report the same to his/her immediate superior/s or management to protect the interest of ICBIBL. He/she shall act as a whistleblower thereby.

17.0 Working Environment

17.1 Health & Safety

Adequate attention is always accorded to the health and safety of the employees, i.e. deployment of both physical and technical surveillance on premises to minimize possible threats to security. Physical premises are under the regulatory requirement to conduct periodic drills for a systematic approach both to prevent any security breaches as well as to promote a culture of security and safety awareness. This involves managing health and safety care as any other critical business activity with periodic reporting, appraisals and improvements made.

17.2 Workplace Environment

Energizing the workplace is one of the key factors of ICBIBL. All employees of ICBIBL are responsible to keep the workplace friendly, congenial, transparent, free from harassment & corruption etc. and ensure the cohesiveness among the colleagues.

18.0 Team Work

Teamwork and co-operation are the important aspect of the work ethics in the organization. An organization shall leverage the dynamics of collective skills, knowledge, and experience to achieve the best for the stakeholders. ICBIBL treats its employee as human capital and will recognize the pivotal role that meritocracy plays in setting rewards and penalties for safeguarding the interests of its employees. It respects the incidence of conflicts arising in the workplace and seeks the amicable resolution of contentious issues in a manner that is constructive, open, honest, and ultimately beneficial to all parties involved.

19.0 Diversity

ICBIBL will respect all employees as unique individuals with fundamental human rights and supports the cultural and ethnic diversity of its workforce. It believes that creating a work environment that enables to attract, retain and fully engage diverse talents, leads to enhanced innovation and creativity in the services of ICBIBL.

20.0 Employees' Grievance

A grievance is defined as any type of problem, concern, dispute, and complaint related to work and the work environment that cannot be resolved through normal day to day communication. Grievances may arise due to differences in perception, misconduct, unfair treatment, intra-personal problems of individual employees, dissatisfaction with working conditions etc. If employees have a grievance, they should try to resolve this informally first. But, if the complainant feels unable to tackle the complaint informally, and cannot reach a satisfactory conclusion through the informal process, he/she may pursue a formal grievance mitigation application.

21.0 Compliance with Laws, Rules, and Regulations

Employees of ICBIBL are expected to comply with the laws, rules, and regulations governing the Organization's business vis-à-vis regulatory bodies. Individuals will be knowledgeable about specific

laws, rules, and regulations that apply to their areas of duties and responsibility.

22.0 Fair & Equal Employment Opportunity

ICBIBL is committed to provide equal opportunity in employment on the basis of individual merit and personal qualifications to employees and applicants for employment. Every individual has the right to work in a professional atmosphere that promotes equal and legal employment opportunities and where discriminatory practices, including harassment are prohibited.

23.0 Harassment

- i. ICBIBL is committed to providing a work environment where all employees can work free from harassment on the ground of religion, age, gender, family background, ethnicity, personal appearance etc. ICBIBL will not tolerate any type of harassment by directors, employees, supervisors or others. All employees will treat each other with respect and courtesy. Harassment in any form including verbal and physical conduct, visual displays, threats, demands and retaliation is strictly prohibited.
- ii. ICBIBL will be committed as employer to create an environment which is free from all forms of harassment and discrimination towards women. Any harassment or discriminatory behavior directed at female employees based on their background, gender, religion, race, color, ethnicity, national origin, age, marital status, physical condition, personal appearance, and status will be dealt with appropriate disciplinary action. Harassment towards female colleagues may include making derogatory or provocative comments, physical violence, inappropriate jokes, and unwanted physical contact, use of epithet, comments or innuendo, obscene or harassing telephone calls, inappropriate content exchange through e-mails, letters, SMS, notes, or any other forms of communication.

24.0 Zero Tolerance to Violence Whistle Blower in the Workplace

ICBIBL will prohibit any acts of violence or threats of violence by any employee against any other person at any time. Mutual understanding and respect toward all employees is an essential element for excellence in professionalism, the existence of safe and healthy workplace, and maintenance of a corporate culture, which serves the needs of the community. ICBIBL has to bear zero tolerance for violence against any of its members of the workforce or its property.

25.0 Special Responsibilities of Superiors

In addition to responsibilities as employees, superiors will abide by the:

- a. **The duty of selection** - Carefully select the employees for a job in light of their personal and professional qualifications.
- b. **The duty of Instruction** - Formulate obligations in a precise, complete, and binding manner, especially with a view to ensuring compliance with provisions of instructions.
- c. **The duty of monitoring** - Ensure that he/she meets the expected deliverable on regular basis and comply with provisions of applicable laws and regulations, on a constant basis.
- d. **The duty of communication** - Communicate to the employees that any violation of the applicable laws/regulations are disapproved of and shall have disciplinary implications.

26.0 Fair Treatment of Customers

Treating customers fairly and without prejudice fosters good rapport and helps to build long-term sustainable business relationships. Moreover, with the advent of global financial crisis, both local and global law-makers and regulators are increasingly focusing on ensuring that NBFIs employ fair practices in dealing with customers. This entails:

- a. Ensuring that communications are fair, concise, clear and not misleading so that clients are fully aware of the product features, relevant fees and associated risks for financial products and services;
- b. Creating products which meet customer needs and takes into account their financial situation, profile and risk tolerance;
- c. Providing quality customer service, delivering on service level promises and handling complaints in an efficient, prompt and friendly manner; and
- d. Identifying and managing possible customer conflicts in an open and clear way.

27.0 Privacy and Security of Clients/Stakeholders Information

- i. In order to provide financial services, ICBIBL will collect, maintain and use the personal information of clients in a manner which allows them to provide better and more tailored products and services and better meet the clients' financial needs and objectives. All information gathered from customers/clients during the course of providing service will be considered confidential.
- ii. All information of an individual's employment in ICBIBL will be considered confidential unless it is clearly stated otherwise (or the situation arises whether he/she has been authorized to do so) and will be used only for the performance of said job duties in line with all rules, regulations, laws and other policies governing the individual's employment. Furthermore, the information will be kept confidential and secure even after leaving the employment of ICBIBL.

28.0 Transparency and Accuracy of Financial, Tax and other Reporting

ICBIBL will ensure that reports and communication are true, complete, and accurate and will not be misleading. ICBIBL will maintain transparency in their business operations and dealings with clients, stakeholders and regulators.

29.0 Interaction in Print, Electronic and Social Media

- All media (print, electronic and social) inquiries shall be forwarded to personnel from Public Relations/Corporate Affairs/Corporate Communications or any other department which has been authorized to initiate contact with the media on behalf of ICBIBL. Bank will ensure that a consistent message in compliance with the governing laws and regulations is broadcast.
- Employees must ensure that no personal correspondences shall appear to be an official communiqué from the Bank since employees are perceived to represent the Bank and thus liabilities and damages may accrue to the Bank with the misrepresentation.
- The advent of social media has enabled people from across the globe to have information at a rapid pace which may at time be sensitive in nature and thus it is particularly important to ensure that social media sites and tools are used by the employees and Management of ICBIBL responsibly and with good judgment in compliance with the Company's policies which restrict the disclosure of confidential information about the Company, its operations, policies and procedures, employees, customers and other stakeholders or any other information that compromises internal controls and safety requirements.
- The employee responsible for such violation would be dealt with the appropriate disciplinary action, which may even lead to termination of service.
 - I. The employee shall not use the social media that involves any kind of criminal activity or harms the rights of others or may result in criminal prosecution or civil liability to those harmed, or both.

30.0 Guidelines for 'Speak Up Policy'

ICBIBL adopts a 'Speak Up Policy' to uphold their commitment to the Code and to maintain a culture of strong ethics and integrity. Any misconduct by personnel from ICBIBL serves to harm not only the reputation and financial performance of that particular organization but also ultimately undermines the trustworthiness of ICBIBL itself.

Management will establish a formal policy, procedure, channels and open environment where the staff is confident in raising concerns about any misconduct and are free from the fear of victimization.

31.0 Personal Investments and Insider Trading

Insider trading is the abuse of confidential information and is defined as a malpractice relating to the exchange of a company's securities by individuals who by nature of their job have access to crucial price sensitive information which is otherwise non-public in nature and thus this gives them a competitive advantage over their investors and undermines the credibility of the financial system. As such, employees and other representatives of Banks are prohibited from partaking in trading of publicly traded securities (including the securities of their place of employment) for personal gain (or for the gain of the members of their household) if they possess material non-public information about the security or the issuer. It is to be noted that insider trading also encompasses giving 'tips' to another person, encouraging anyone else to deal or dealing on behalf of anyone else based on other non-public 'inside' information.

Furthermore, employees and other representatives of Banks shall not take any personal investment in an enterprise (including in a public or private company that does business transactions or is a supplier or competitor of their place of employment) if the result of this investment affects or appears to affect his/her ability to make any unbiased business decisions in favor of his/her employment as thus resulting in a conflict of interest.

32.0 Arranging Seminar / Workshop / Training

ICBIBL will organize and sponsor seminars/workshops/debates and discussions in order to promote ethics, integrity and compliance standards within the organization in specific and the financial services industry in general.

33.0 Automation / Digitalization of Business Process

In today's business environment, advancements in technology and administrative functions are increasingly leading to the automation and digitalization of business processes. ICBIBL takes necessary steps to ensure that any such advancement does not compromise the integrity of information security and that guiding principles of the Code of Conduct are duly complied with.

34.0 Employee Conduct Outside the Office Premises

Employees and representatives of ICBIBL will realize that their conduct outside the workplace reflect

on their place of employment and take necessary actions to ensure that the above-mentioned service conduct must encompass outside workplace activities as well so that behavior/actions do not compromise the business interests, safety and security or confidentiality of their place of employment. As such, employees will exercise caution while interacting with outside entities so as to not be perceived negatively by the media, society, or the communities in which they operate. Moreover, affiliations with certain entities which may result in the conflict of interest or disclosure of confidential information are to be strictly avoided.

35.0 Grooming, Etiquette, and Compliance with the Dress Code

ICBIBL has an official grooming standard which is suitable to the culture and values of Bangladesh. For relationship managers and other front office personnel, it is important to realize that he/she is often the first point of contact for any customer and as such his/her conduct, grooming, etiquette, proficiency and overall service quality will reflect on their place of employment. It is therefore important not only to make a great first impression but also to continue to repeat such behavior throughout all interactions with the customers.

35.1 Grooming:

➤ Grooming (male)

- ❖ Male staff should be perfectly clean shaven and sideburns should be properly trimmed
- ❖ Mustache and beard (for those who want to keep) should be trimmed properly
- ❖ Hair should be healthy and dandruff free and kept properly and perfectly combed
- ❖ Hair must not fall over the ears, eyebrows or even touch the back of the collar
- ❖ Shocking and unreal hair color is not allowed.
- ❖ Eyes to be cleaned carefully, especially the corners
- ❖ Nose hair should be trimmed regularly and nose should be clean and free of blackheads
- ❖ Keep your face always clean and oil-free and apply lip balm to avoid chapped lips
- ❖ Teeth and tongue should be cleaned properly to avoid bad breath
- ❖ Remember to rinse your mouth after every meal
- ❖ For those who smoke it is important to rinse the mouth after every smoke and use a mouth freshener
- ❖ Mild perfumes, cologne or deodorants must be used to avoid unpleasant body odor
- ❖ Most people find the odor offensive. If you have it frequently, you may find it difficult to socialize with others or hold a job
- ❖ Nails must be cleaned, properly cut and filed
- ❖ Palms should be clean and sweat free for a proper handshake
- ❖ Spectacles should be clean so that eyes are properly visible

- ❖ Personal grooming like hair brushing, nails filing or flossing etc. is not allowed in public/desk

➤ **Grooming (female)**

- ❖ Nose should be clean and free of blackheads
- ❖ Hair should be healthy and dandruff free and kept properly and perfectly combed. Keep hair neatly tied with plain or natural/black/brown colored clip/pin/band.
- ❖ Shocking and unreal hair color (like pink/purple/golden/burgundy etc.) is not allowed. Hair color should not be more than one or two shades darker or lighter than your natural hair color
- ❖ Wash your hair with shampoo and conditioner that suits your hair type regularly and keep it in a length and style at which you can maintain it
- ❖ Mild perfumes or deodorants should be used to avoid body odor. Carry a deodorant spray/perfume with you, if needed to smell good throughout the day
- ❖ Teeth and tongue should be cleaned properly to avoid bad breath
- ❖ Remember to rinse your mouth after every meal
- ❖ Keep your face always clean and oil-free and take care of unwanted facial hair
- ❖ You should carry a lip balm or lipstick for a quick touch-up to avoid chapped lips
- ❖ Eyes to be cleaned carefully, especially the corners
- ❖ Nails must be cleaned, properly cut, filed and managed. For proper hand, foot and nail care have manicure & pedicure at least once a month
- ❖ After washing hands, use a good hand cream or a lotion. Use cream on elbow to avoid whitish dry look
- ❖ Wash your feet properly each time you come back home. Soften your feet with a moisturizer or lotion
- ❖ Spectacles should be clean so that eyes are properly visible
- ❖ Personal grooming like hair brushing, nails filing, applying lipstick/perfume, eyebrow plucking or flossing etc. is not allowed in public/desk
- ❖ Things you should carry in your bag, in addition to your keys, wallet, ID card and mobile phone are make-up kits like lipstick/lip balm, perfume, moisturizer, an emery board/nail cutter, hair comb, clips, safety pins and tissues etc.

35.2 Etiquette:

➤ **General Office Etiquette:**

- ❖ Keep personal life away from your corporate/professional life
- ❖ Always hold yourself to a higher standard, no matter your job or your title

- ❖ Facial expression should be bright and confident so that you seem to be enjoying your work
- ❖ Behave in the workplace with courteousness and respect. Treat every staff with the same respect irrespective of their designation/title
- ❖ Be on time - at office, business meetings, any official training or another occasion
- ❖ Respect the privacy of those around you. Don't read memos, notes or faxes on other peoples' desks and don't make comments about overheard phone calls
- ❖ Always monitor the volume of your conversations, don't be loud - Being loud is one of the most annoying characteristics of people in the workplace
- ❖ Pay attention and be a good listener, don't interrupt unless you absolutely have to, during meetings or even in casual conversation
- ❖ Never ever go over your superior's head
- ❖ Don't borrow items from other mates in the office without letting them know – ask before borrowing
- ❖ Avoid office romance/dating a colleague. Office romance is not just distracting to you but also those around you
- ❖ Sharing professional information is wonderful, gossiping is not. Avoid sharing or taking part in office gossip. It hurts and could not even be true
- ❖ Don't be a whiner who complains all the time
- ❖ Don't borrow money. It can put you in a very uncomfortable situation
- ❖ Walk confidently and with a purpose, don't stroll
- ❖ Use shared areas with respect and courtesy
- ❖ If you're surrounded by others, do try and keep noise to a minimum
- ❖ Everything you say makes an impression on your "internal customers"
- ❖ Maintain all shared items in "like new" condition and return borrowed supplies
- ❖ First Impressions Last – Always introduce yourself properly to new people you meet, whether they are visitors, clients or also work for your company
- ❖ Always be a person of 'superior manners' Say 'Excuse Me', 'Please', 'Thank You' and 'I'm Sorry':
 - ✓ Always say "excuse me" when you cough, when you sneeze, and when you call someone's attention in between their work or conversation
 - ✓ Always say "please" when you asking someone a favor. Without this, you will sound like you are demanding or giving command
 - ✓ When people do things for you, whether it is a superior or a subordinate, you should always say, "thank you". This will show your co-workers that you appreciate them for what they do for you and for the company

- ✓ Saying “I’m sorry” is such a powerful way of letting others know that you didn’t mean what just happened, thus making the situation less disturbing or less disappointing. Saying “I’m sorry” is just an initial step because it should be followed with what you should do to make it up.

➤ **Cubicle**

- ❖ Bear in mind that your cubicle is a direct reflection of you, so keep it neat and tidy and all unwanted papers and files should be removed
- ❖ Desk should have facial tissue boxes available
- ❖ Don't discuss a confidential matter in a cubicle setting
- ❖ Don't enter another person's cubicle unless you are invited/without permission
- ❖ Don't interrupt someone who is on the phone by using sign language or any other means of communication
- ❖ Don't play music at your desk during business hours
- ❖ You can place pictures of your family, friends and relatives on your desk, but limit it to 4-5 pictures

➤ **Dining:**

- ❖ Having lunch at desk is avoidable; use lunch room/dining space for this purpose
- ❖ Be tidy and keep the dining space clean and healthy
- ❖ You must not make sound while eating or drinking
- ❖ Don't blow on food to cool it
- ❖ Don't talk while chewing food or with mouth full
- ❖ Don't drink with food in the mouth
- ❖ Avoid taking or delivering food over others
- ❖ When in the queue,
 - ✓ Await your turn and never push people or start serving yourself from the middle of the line
 - ✓ While serving yourself, never heap food on your plate; returning for seconds is perfectly acceptable
 - ✓ If an item appears to be short supply, it would be rude to serve yourself a large portion
- ❖ When in the dining table,
 - ✓ Enter the chair from the left and rise from the right
 - ✓ Sit up fairly and straight, keep elbows in and place the napkin on the lap
 - ✓ Wait until all are served before beginning to eat
 - ✓ Pass food to the right

- ✓ Use utensils from outside-in
- ✓ Cut and eat one piece at a time
- ✓ Bring food to mouth not mouth to food
- ✓ Hold drinks in the left hand and place the glass at the left
- ✓ Chew quietly with mouth closed, eat slowly and take small bites
- ✓ If you have to leave the table during a meal, you must leave the napkin on the chair or to the right of the plate
- ✓ The “rest” position of the utensils is crossed on the plate, with the forks line pointing down. This tells that the meal has not been finished
- ✓ When you need to sneeze or cough, turn your head and cover the mouth or quietly excuse yourself and go to the washroom
- ✓ Place the utensils side by side to the 11 o’clock position after finishing the meal
- ✓ Don’t drop water or food on the table
- ✓ Replace chair after the meal

➤ **Washroom/Toilet:**

- ❖ Be sanitary, wipe up excess water and no sprinkles on the seat
- ❖ Do not ever forget to flush when you are done and wash your hands
- ❖ Do your thing and get on out of there, do not take your own time if there is queue
- ❖ Do not leave behind strands of your hair or anything that block the sink
- ❖ Be sure the toilet is clean for the next user. Notify the proper attendant if supplies are low or out, and of any plumbing problem

➤ **Phone:**

- ❖ As a basic rule, keep your voice down
- ❖ Never use speaker phone during office hour
- ❖ Always answer your phone on the second or third ring
- ❖ Remember to keep the ringer of cell phone on low or in vibration, ringtone must be decent and formal
- ❖ Decent instrumental tune can be used for welcome note/caller tune, but songs are not allowed
- ❖ The use of the office telephone shall be for work-related activities only. Any misuse and abuse of the telephone for personal interest shall not be tolerated. Persistent breaches of this ruling shall result in the employee being reprimanded with disciplinary action and his/her telephone access removed
- ❖ Never talk with food in your mouth
- ❖ Don’t use foul language or leave the party on the other end hanging on eternal hold

- ❖ You should turn off or keep cell phones silent during all meetings
- ❖ You must assess the nature and privacy of the call when receiving it in public

➤ **Email**

- ❖ Be concise and to the point - Do not make an e-mail longer than it needs to be
- ❖ Answer all questions, and pre-empt further questions
- ❖ Use proper spelling, grammar & punctuation for conveying the message properly
- ❖ Answer swiftly - Each e-mail should be replied to within at least 24 hours, and preferably within the same working day
- ❖ Do not attach unnecessary files - By sending large attachments you can annoy others and even bring down their e-mail system
- ❖ Use proper structure & layout - Use short paragraphs and blank lines between each paragraph. When making points, number them or mark each point as separate to keep the overview.
- ❖ Do not overuse the high priority option
- ❖ Do not write in CAPITALS - IF YOU WRITE IN CAPITALS IT SEEMS AS IF YOU ARE SHOUTING.
- ❖ Read the email thoroughly before you send it
- ❖ Do not overuse Reply to All - Only use Reply to All if you really need your message to be seen by each person who received the original message
- ❖ Do not use email to discuss confidential information
- ❖ Use cc: field sparingly - Try not to use the cc: field unless the recipient in the cc: field knows why they are receiving a copy of the message

35.3 Communication Ethics :

- ❖ The communication channels and equipments that are available for use are readily accessible and simple to use. Because of this widespread availability, the Bank has to be careful in ensuring that communication between parties within the Bank or with external parties is performed properly and within acceptable standards and permissible principles. Any abuse of the use of the communication channels shall result in the employee being counseled and if such abuses persist, the employee shall be liable to disciplinary action.
- ❖ For all intent and purposes, the official communication channel between parties within the Bank and with external parties shall be paper-based. Under normal Customer Service, communication may transpire through telephone but related Banking transaction instructions must be officially confirmed and follow up in writing either by the Customer or the Bank.

- ❖ Communication between parties within the Bank shall be via personal verbal exchanges, Internet email, through letters/memorandum or via the telephone.
- ❖ Any employee who is caught misusing the Bank's official letterhead and stationery for his/her own personal matters shall be liable to disciplinary action by the Bank.
- ❖ Employees must not use the Bank's official correspondence address to receive personal mails or parcels. Should there be such incidence, the Bank's management shall be informed and prior approval obtained.
- ❖ Employees must not utilize telephones, cellular phones, facsimile, text messages and emails or any other unsecured communication channels to communicate confidential, proprietary or sensitive information.
- ❖ On-line service via internet shall only be accessible to employee specifically authorized by the Bank. Authorized employees to access the internet must provide a duplicate of their Internet Access password in a sealed and signed envelope to the CEO and COO/Branch Manager/Head of Department for custody under lock and key. HQ. Employee must not share his/her password with other employees.
- ❖ The Internet service is to be used for work-related activities only. An employee who constantly uses the Internet service for non-work related activities shall be counseled by his/her immediate superior to desist in doing so. Persistent breaches of this ruling shall result in the employee being reprimanded with disciplinary action and his/her Internet access removed.

35.4 Dress Code

➤ **Dress Code for Men**

➤ **Clothing:**

Shirt

- ❖ Decent light colored full sleeved shirt preferably white, off-white/cream, light blue, ash, and light grey, plain or thin pinstripes or mini/small square checks are desirable. Dark colored or loud check shirts are not allowed
- ❖ No folding of the shirt sleeves is allowed
- ❖ No T-shirt is allowed but Polo T-shirt in dress down day, if any
- ❖ Properly fitted, ironed and wrinkle free clothes should be worn (no dirty/torn, too tight/big attire is allowed)
- ❖ Where necessary, proper jackets, sweaters, pullovers and cardigans may be used
- ❖ All employees who are provided with uniforms must wear them during office hours at all times

- **Trousers**
 - ❖ Dark colored, well fitted trouser
 - ❖ Trousers zippers should be zipped and should not be visible
 - ❖ No stitch-up trousers (jeans, cargo pants) are acceptable

- **Suit & Tie**
 - ❖ Wearing tie is preferable
 - ❖ Dark colored business suits (plain/thin or pinstriped) is preferable with perfectly knotted ties
 - ❖ Tie should be conservative, not too wide or too narrow and tip of the tie should touch the top of the belt buckle
 - ❖ Tie with shocking, loud color must be avoided

- **Shoe & Belt**
 - ❖ Black or brown polished shoes with clean, dark socks and matched colored waist belt.
 - ❖ The belt should not be too large or small.
 - ❖ Socks should be clean and cover the calves.
 - ❖ Lace-up conservative shoes are most appropriate
 - ❖ Sneakers and sports shoes are not allowed

- **Accessories**
 - ❖ Accessories or jewelry should be limited to 3 (three) pieces that include watch, ring and cuff-links
 - ❖ Facial piercing ring is prohibited
 - ❖ The wristwatch worn should be of a traditional/formal design with a plain and simple face and fitted band.
 - ❖ Bracelets, neck chains or earrings are not allowed

- **Tattoos**
 - ❖ Any tattoos on the employee's body must not be visible during office hours

- **Dress Code for Women**
 - **Clothing**
 - ❖ Culturally and professionally befitting and sober dresses like Salwar Kamiz with orna and Saree
 - ❖ Dresses should be worn in a decent way (No sleeveless/ deep neck/ wide back/ transparent/ shocking/ fluorescent colored attire are allowed). Jeans are not allowed
 - ❖ Soothing/sober colored, properly fitted, ironed and wrinkle free clothes should be worn.

- ❖ Where necessary, proper jackets, sweaters and cardigans may be used
- ❖ All employees who are provided with uniforms must wear them during office hours at all times
- **Foot Wear**
 - ❖ Nice and smart sandals or sandal shoes that coordinate with the dress color
 - ❖ Avoid fancy footwear. Heels must not be more than 2 inches in height
- **Handbag**
 - ❖ A handbag should be of right size that can accommodate necessities
 - ❖ It should be simple and preferably of dark color/coordinate with the shoe color. Avoid sparkles, jewels and spangles on handbags
- **Accessories**
 - ❖ Accessories or jewelry should be kept minimal and conservative
 - ❖ Facial piercing ring is prohibited
 - ❖ Wearing excessive and noisy accessories is not allowed. Earrings, rings, pendants, bangles, brooches and watches should be simple and smart
 - ❖ Several earrings, finger rings, bangles, brooches should be avoided. Limit these one/two per ear and hand.
- **Make up**
 - ❖ Heavy make-up is prohibited. Reasonable and natural looking light make up suitable for office should be applied (Glitters/Shocking and lousy make up are not acceptable)
 - ❖ Eye makeup should be very light
 - ❖ Choose lighter shades for lipstick and do not use bright shades like red, orange, baby pink etc.
 - ❖ Use light shades in nail color. Avoid shocking nail color, paint, nail art or fancy nail accessories
 - ❖ Stay away from extremely dark, bright red, shocking and fluorescents colors
- **Tattoos**
 - ❖ Any tattoos on the employee's body must not be visible during office hours

36.0 Post-Employment Activities and Responsibilities

It is probable that during the course of employment staff members and other representatives of ICBIBL may be privy to sensitive information about the company, customers and other stakeholders and business processes which can be confidential in nature and also of proprietary nature for the organization. As per the Code of Conduct (as well as the exit clauses of employment contracts)

employees will act with the highest standard of integrity and refrain from divulging such information.

37.0 Responsibilities of Ethics Committee to Uphold the Code of Conduct

The Board of Directors, as well as the Management of ICBIBL will be responsible for proper implementation of this Code of Conduct. The Management of ICBIBL and NIS Committee will be intimated about the Code of Conduct and any change thereof.

38.0 Recognition & Award

ICBIBL has reward programs that take into account not only the performance of the employee but also the way how the performance achieved. Rewards system have been designed in a way which encourages compliance with the Code of Conduct and the highest level of integrity.

39.0 Disciplinary Procedures and Actions

ICBIBL has a disciplinary procedure which is in compliance with local laws and ensures fair treatment to employees to ensure that employees disciplinary matters are judged fairly, transparently, consistently and proportionately, using appropriate processes and achieving fair outcomes. Any disciplinary actions undertaken will take into account the gravity of the misconduct, previous records (if any) and any other extenuating or aggravating circumstances which may even lead to termination of service.

40.0 Compliance with the Code of Conduct

Every employee of the Bank is obligated to comply with this Code of Conduct and Ethics. All Rules stated therein must be complied and the applicable Laws and Regulations must be respected. It is non- negotiable that, all staff of the Bank must take responsibility to act Ethically and Professionally with integrity in performing the day to day duties and in handling Customer Service. Bank's staff should seek assistance from next most Senior Manager to clarify and further define the Rules of Code of Conduct and Ethics when handling any difficult issues.

Any breach or non-observance of this Code of Conduct and Ethics shall render the employee liable to disciplinary procedures or the Bank Management may find termination of service necessary or to such other sanctions as the CEO/COO or Board of Directors shall deem fit.

Control:

- i. All new employees who joining ICBIBL as well as existing employees are required to commit to

the Code of Conduct and duly sign a statement of compliance attesting the same annually.

- ii. At all times employees will act in a professional and ethical way and uphold the highest standards of honesty, trust, fairness, integrity and diligence :
 - a. Consider and value the risks and implications of each employee's actions, make them accountable for works to be performed and for the impact their actions may have on others;
 - b. Comply with all current regulatory and legal requirements, and endeavor to follow best industry practice;
 - c. Keep scope to adopt/incorporate with future changes in this Code of Conduct and in or any part/paragraph/point of this Code of Conduct;
 - d. Make information reliable and appropriate, and use them with confidentiality and sensitivity;
 - e. Be alert to and manage potential conflicts of interest which may arise whilst performing their role, motivate them not act for personal gain or advantage;
 - f. Treat all customers, colleagues and counterparties with respect and take responsibility for the advice and services provided to them;
 - g. Senior staff should lead by example and act as positive role models to others; and
 - h. Continuously develop and maintain technical and professional skill and knowledge and competence of the workforce; and
 - i. Uphold the name and reputation of ICIBL and as well as the profession.

41.0 Amendments or Modifications to and Dissemination of the Code of Conduct

Management of ICIBL preserves all right and authority to amend the Code of Conduct entirely or partly as and when deems necessary. It is the responsibility of ICIBL to ensure proper and timely dissemination of the Code of Conduct amongst their employees and concerned parties and the stakeholders.