



Code of Conduct



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## President's Note

Dear Team Member,

Our uncompromising commitment to act with integrity and conform to the highest ethical standards depends on individual decisions that we make every day. We are all responsible for the way JS Bank conducts its business, as well as how it is perceived by our customers, shareholders, business partners and employees.

I know that each of you will join me in complying with the policies in this code of conduct, as well as all other policies, rules and regulations that apply to you and your JS Bank business unit.

In short whatever our jobs may be, ethics and compliance must be everyone's responsibility.

Basir Shamsie  
President & CEO

## PURPOSE

JS Bank's reputation is a priceless asset that each of us must maintain. Our reputation not only affects whether or not someone will choose to be our customer; it also determines whether we are proud to be associated with the JS Bank - how we feel about coming to work. The Code of Conduct is designed to guide the personal business ethics of each of us.

We expect in our people integrity, honesty and the highest moral principles. Within these general parameters, the Bank does not intend to attempt any control over the private lives of its people or to say how these lives are to be lived.

Character reflects what a person is; reputation denotes what a community considers a person to be. The Bank will not tolerate any conduct, which might be considered as detrimental to the reputation of the Bank. We must rely on a sense of propriety and good judgment in upholding standards, which are always above reproach. It applies to every employee of JS Bank. You are expected to read this document promptly upon receiving it, and to sign and return the Code of Conduct acknowledgment. You are also expected to read and understand the Bank policies that relate to sections of this Code. In addition to the ethical guidelines included in the Code, there are many laws and regulations that affect our business; you must comply with the requirements of all applicable laws and regulations. This is mandatory for everyone and is not subject to business priorities of individual discretion.

Adherence to the Bank's Code of Conduct is a condition of your employment. All employees are required to comply with the Code, without exception or waiver.

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# Business Ethics and Compliance with the Law



## Business Ethics and Compliance with the Law

**You must protect and enhance the assets and reputation of JS Bank.**

Our business is based on a strong tradition of trust. It is the reason our customers come to us. Honesty and integrity are cornerstones of ethical behavior. Trustworthiness and dependability are essential to lasting relationships. Our continued success depends on doing what we promise - promptly, competently and fairly.

In our rapidly evolving businesses, each of us is challenged by a complex environment, which often requires a fast response under pressure. No written policy can anticipate every ethical dilemma or definitively set forth the appropriate action for all business situations. Accordingly, rather than a set of specific rules, this Code, emphasizes a standard of ethical conduct that must permeate all of our business dealings and relationships. JS Bank relies on your good judgment in applying these standards.

**You must conduct business in accordance with applicable laws and regulations and the Code.**

You should consult the Bank's Compliance Officer or the Human Resource's Office whenever you have a question about the legality of a course of action. You must also exercise the utmost care to ensure that all statements you make are accurate.

**Managers/Supervisors, by virtue of their positions of authority, must be ethical role models for all employees.**

An important part of a manager's responsibility is to exemplify and exhibit the highest standards of integrity in all dealings with fellow employees, customers, suppliers and the community at large. An equally important responsibility is to obtain employees' commitment - and develop their ability - to make sound ethical judgments.

Managers must communicate the seriousness of the Bank's expectations for ethical conduct and their own personal support of these expectations. Ethical leadership includes both fostering a work environment that encourages employees to voice concerns or otherwise seek assistance if faced with potentially compromising situations, and supporting those who speak out.

Managers/Supervisors must be alert to any situations or actions that may be unethical or potentially damaging to the Bank's reputation and must respond appropriately. Managers must take prompt action to address such situations and actions, and must avoid even the appearance of implicit approval.



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# Treatment of Employees and Others

Treatment of  
Employees and Others





## Treatment of Employees and Others

**You must treat colleagues, employees and others with whom you interact with respect and dignity.**

Treating all employees and others in the workplace with respect and dignity is part of JS Bank's values that applies to everyone. This is particularly important for leaders, who must be role models for their direct reports. Employees are likely to treat their colleagues, including those whom they manage, as they themselves are treated. The bank expects leaders to seek out the ideas of employees and to involve them in decisions whenever appropriate. At the same time, once a decision is made, everyone involved is expected to pull together and support it.

## Safety, Health and the Environment

**You must comply with all applicable laws and Bank policies relating to safety, health and the environment.**

The Bank is committed to high standards of safety and employee protection. Meeting this commitment is the responsibility of each JS Bank employee. To that end, the Bank shall comply with all applicable government safety, health and environmental regulations, and establish systems to provide a safe and healthy workplace.

You are also responsible for working safely to avoid risk to yourself and colleagues, identifying and reporting unsafe working conditions or breaches of security, and reporting injuries in the workplace.

## Diversity, Equal Employment Opportunity and Freedom from Harassment

**You must support the Bank's commitment to diversity and equal employment opportunity. You are also expected to create a work environment free from intimidation and harassment.**

JS Bank seeks and values diversity among its employees, recognizing that a mix of people enriches our Bank and is essential to creativity and business growth. As a bank, we are committed to equal employment opportunity and unbiased treatment of all individuals based on job-related qualifications and without regard to race, color, gender, age, national origin, religion, creed, sexual orientation, gender identity, marital status, citizenship, disability, veteran status or any other basis prohibited by law.

The Bank's policy is to create a work environment that is free from intimidation and harassment. Intimidation and harassment of employees by co-workers, leaders or outsiders is prohibited. Harassment includes behavior - whether in person or by other means, such as e-mail - that is offensive and interferes with an employee's work performance or creates an intimidating, hostile or offensive work environment. Examples of potentially offensive behavior include unwelcome sexual advances or remarks; slurs, jokes or disparaging comments about race, ethnicity or sexual orientation; and business meals or entertainment at sexually suggestive venues.



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# Sexual Harassment at Workplace

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# Conflicts of Interest and Business Opportunities

Conflicts of Interest and  
Business Opportunities



## Conflicts of Interest and Business Opportunities

You must be alert to any situation that could compromise the position of trust you hold as a JS Bank employee, and avoid any kind of conflict between your personal interests and those of JS Bank.

You may engage in outside activities that do not conflict with the Bank's interest, interfere with the responsibilities of its employees, or damage or misuse its reputation, trademarks, relationships, confidential information or other property.

You must disclose all outside positions or other employment to the Human Resource's representative, who will determine if a conflict exists. If a conflict does exist, you will not be permitted to continue in or accept that position or employment.

You should never use your position with the Bank, or information acquired during your employment, in a manner that may create a conflict - (or even the perception of a conflict) - between your personal interests and the interests of the Bank or its customers and clients. You also should be aware that actual or potential conflicts of interest may arise not just from dealing with external parties, such as customers or suppliers, but also from relationships or transactions with managers, direct reports or other employees (e.g., such as receiving loans that are not on generally available terms and conditions). If a conflict or potential conflict arises, you must report it immediately. You may report it to your manager/supervisor or your compliance officer, who will review the matter with the Human Resource's representative. You also may report a conflict or potential conflict directly to the Human Resource's representative. Any such discussion will be held in confidence to the extent possible and in a spirit of cooperation.

### Gifts and Gratuities

You must not solicit, accept or give gifts that may influence business decision.

You must not solicit or accept, directly or indirectly, any cash or monetary equivalents, objects of value or preferential treatment from any person or enterprise that has, or is seeking business with the Bank, where doing so may influence, or appear to influence, your business judgment. Indirect gifts can include gifts to your family members or a charity you support. Conversely, you also must not offer excessive gifts or entertainment to others whose business the bank may be seeking.

You may accept business-related meals, entertainment, token gifts or favors only when the value involved is not significant i.e. amount is not more than Rs. 6000/- and clearly will not place you under any real or perceived obligation to the donor. In general, you should pay for your own meal. In no event should you offer or accept



business meals, or attend business functions, at establishments featuring sexually suggestive entertainment.

Many customers and suppliers consider reasonable gifts and entertainment as a sensible and acceptable business practice without subjective intent to unduly influence the judgment of bank's employees in business matters. It is anticipated that this statement of policy, with its emphasis on how the situation might be reviewed at a later date by a disinterested third party, will enable you to discourage gifts and entertainment falling in the "gray area" without embarrassment to either you or to the customer or the supplier.


You are not permitted to accept gifts, entertainment, or other favors from existing or prospective customers of the Bank or suppliers as set forth below:

Whoever;

- Corruptly gives, offers, or promises anything of value to any person, with intent to influence or reward an employee, agent, or attorney of a financial institution in connection with any business or transaction of such institution; or
- As an employee, agent, or attorney of a financial institution, corruptly solicits or demands for the benefit of any person, or corruptly accepts or agrees to accept anything of value from any person, intending to be influenced or rewarded in connection with any business or transaction of such institutions, shall be guilty of an offense.

Exceptions to the general prohibition regarding acceptance of things of value in connection with the bank's business may include:

- Acceptance of gifts, gratuities, amenities or favors based on obvious family or personal relationships (such as those between the parents, children or spouse of a Bank employee) where the circumstances make it clear that it is those relationships rather than the business of the Bank concerned which are the motivation factors;
- Acceptance of meals, refreshments, entertainment (including tickets to sporting events, arts, concerts, etc.), accommodations or travel arrangements, all of reasonable value, in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided that the expense would be paid for by the Bank as a reasonable business expense, if not paid for by another party;
- Acceptance of advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars, diaries and similar items;

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- Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers;
  - Acceptance of gifts of reasonable value that are related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, holiday or birthday;
  - Acceptance of civic, charitable, educational, or religious organization awards for recognition of service and accomplishment;
  - Items on a case-by-case basis, not identified above, in which a Bank employee accepts something of value in connection with bank business, provided that such approval is made in writing (directly to the CEO) on the basis of a full written disclosure of all relevant facts and is consistent with the Bank's policies. Any business related personal benefit, which you or your family gives or receives, must be reported in writing within three working days to your immediate supervisor or Human Resource's representative. An officer receiving such a report must promptly acknowledge receipt.

The underlying principle is that the employee should not derive material gain from the Bank's business.

### Family Members Providing Services to the Bank

You must disclose all instances in which you seek to hire or engage a family member or his or her firm to provide goods or services to the Bank.

While there is no prohibition against the employment of close relatives or engagement of his or her firm to provide goods and services to the Bank, the integrity of the personal process must be maintained. 'Close relative' is defined herein as son, daughter, brother, sister, mother, father, spouse, step relatives or in-laws.

Therefore, no one shall serve on a committee; make personal recommendations or decisions, influence any person making decisions such as appointment, retention, transfer, advancement or promotion affecting a close relative.

Furthermore, family relationship (close relative) shall not be considered a criterion in any personnel action such as appointment, retention, tenure, or promotion.



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# Books and Records





## Books and Records

### Accuracy and Completeness

You must ensure that the accounting and financial records of the Company meet the highest standards of accuracy and completeness.

Reporting accurate, complete and understandable information about the Bank's business, earnings and financial condition is an essential responsibility of each employee.

It is also your responsibility to make open and full disclosure to, and cooperate fully with, the Bank's outside accountants in connection with any audit or review of the financial statements of the Bank. If you have reason to believe that any of the Bank's books and records is not being maintained in an accurate or complete manner, you are required to report this immediately to your Manager, the Chief Financial Officer, the Bank's Internal Auditor or your Compliance Officer. Similarly, the Bank relies on you to come forward if you feel that you are being pressured to prepare, alter, conceal or destroy documents in violation of Bank policy.

In addition, you must report to any of the individuals, mentioned above, if you have any reason to believe that someone has made a misleading, incomplete or false statement to an accountant, auditor, attorney or government official in connection with any investigation, audit, examination or filing with any government agency or regulatory body.

### Financial Statements and Accounts

You must report transactions accurately, completely and in appropriate detail if you are involved in supplying any kind of supporting documentation, determining Account classification or approving transactions.

You must record all transactions appropriately to facilitate full accountability for all assets and activities of the Bank and to supply the data needed in connection with the preparation of financial statements. If you are involved in the preparation of the Bank's financial statements, you must apply generally accepted accounting principles and other applicable accounting standards and rules, so that the statements fairly and completely reflect the operations and financial condition of the Bank.

### Travel and Expense Accounts

You may request reimbursement only for actual and reasonable business-related expenses that are properly documented, approved and in accordance with the Bank's travel and entertainment (T&E) reimbursement policy.

You can find the T&E reimbursement policy with Human Resource Department. Managers must ensure that employees adhere to the Bank's T&E reimbursement policy. If you are a manager, you should review employees' expense reports and underlying detail for compliance with the policy.

In addition, you are responsible for educating new employees on the T&E policy.

# Protection and Proper Use of Bank Property



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## Protection and Proper Use of Bank Property

You are entrusted with protecting the bank's property.

Acts of dishonesty against the bank or its customers involving theft, destruction or misappropriation of money, property, office equipment, supplies or any other items of value are, of course, prohibited.

Classification, alteration or substitution of records for the purpose of concealing or aiding such acts is also prohibited. If you suspect someone has committed such an act or if you witness such an act, you should report it immediately to your local security representative.

You must protect and properly use the bank's computer equipment, including internet access. You also must take precautions to properly secure your computer. For example, you should lock your laptop in its docking system, and you should not leave it where it would be vulnerable to theft, such as at a restaurant coat check or in your car. You also should follow the bank's procedures for disposing of personal computers, personal digital assistants, mobile phones or other bank assets.



# Outside Pressure

Outside Pressure



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## Outside Pressure

You must refrain from bringing in outside pressure or influence to attain personal gains within the organization; any such attempt will be subject to Disciplinary Action/Corrective Guidance.

### Influencing Others

You may not use your position to coerce or pressure employees to make contributions or support candidates or political causes.

In certain instances, the Bank may encourage employees to support or oppose legislative issues that affect the Bank's businesses. In no instance, however, may you use your position of authority to make another employee feel compelled or pressured to work for, or on behalf of, any legislation, candidate, political party or committee, to make contributions for any political purpose, or to cast his or her vote one way or the other.



# Customer Privacy and Information Security

Customer Privacy and  
Information Security



## Customer Privacy and Information Security

You are responsible for protecting the privacy, confidentiality and security of customer information entrusted to the Bank.

In each of our businesses, we are entrusted with important information about our customers - information vital to our ability to provide quality products and services. The Bank owes a strict duty of confidentiality to its customers. You will not disclose to any third party particulars of the identity or financial, business or personal affairs of a customer, except pursuant to a statute or regulation, or valid court order or unless:

- The customer has given prior written consent
- Disclosure is compelled by a court or statutory authority of competent jurisdiction
- Disclosure is compelled by law, due to money laundering, or by regulatory requirements, or
- Disclosure is necessary to protect the Bank's interest, for example disclosure to the police in case of suspected fraud.



# Intellectual Property

Intellectual Property





## Intellectual Property

**You must protect and, when appropriate, enforce the Bank's intellectual property rights.**

The Bank's intellectual property is among its most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties, in a fashion similar to real property (i.e., land). Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, know-how and other intangible industrial or commercial property.

### Confidential Information and Trade Secrets

**You must protect confidential information and trade secrets, and prevent such information from being improperly disclosed to others inside or outside the Bank.**

During the course of your employment, you may learn confidential information about the Bank that is not known to the general public or to competitors. Information of this sort is considered a trade secret if it provides the Bank with a competitive or economic advantage over its competitors. Confidential information or trade secrets may not be disclosed outside the Bank or used for your own or someone else's benefit.

These obligations apply both during, and subsequent to, your employment with JS Bank. When you leave the Bank, you must return any and all copies of materials containing the Bank's confidential information or trade secrets in your possession.

Some examples of JS Bank's confidential information or trade secrets include:

- Customer lists;
- The terms, discount rates or fees offered to particular customers;
- Marketing or strategic plans; and
- Software, risk models, tools and other system developments.

Within the Bank, confidential information and trade secrets may be divulged only to other employees who need the information to carry out their duties. When discussing confidential information or trade secrets, you must not do so in places where you can be overheard, such as taxis, elevators, the Bank cafeteria or restaurants. In addition, you should not communicate or transmit confidential information or trade secrets by non-secure methods (e.g., cell phones, non-secure e-mail, hotel faxes, etc.).



## Trademarks, Copyrights and Patents

You must protect the Bank's trademarks, copyrights and patents.

Publications, documentation, training materials, computer codes, and other works of authorship, you develop for the Bank, are the types of material that can be protected by copyrights. You may also create, discover or develop software, methods, systems or other patentable inventions when performing your responsibilities or utilizing information or resources available to you in connection with your employment. To the extent permitted by law, as an employee or a contractor, you agree that all such works of authorship and inventions, whether or not patentable or protectable by copyright, trade secret or trademark, are assigned to the Bank whether they be improvements, derivatives, designs, technologies, written materials, programs or any other works.

## Intellectual Property of Others

You must respect the intellectual property belonging to third parties in a manner consistent with that outlined for JS Bank.

It is Bank policy to not knowingly infringe upon the intellectual property rights of others. When preparing advertising or promotional materials, using the name or printed materials of another company, or operating a software program on a Bank computer, you must be sure that the use of any third party intellectual property is proper. In addition, you may not copy software or bring in software programs from home. Only software properly licensed by the Bank is permitted on Bank computers.

You also may not copy third-party newsletters or periodicals for broad distribution unless the Bank has a license to do so.

You should not disclose to the Bank, or be asked by the Bank to disclose, confidential information or trade secrets of others (e.g., your former employer). You are not permitted to possess or circulate improperly obtained confidential information or trade secrets belonging to a competitor. Similarly, during the course of performing your responsibilities, you may rightfully obtain information concerning possible transactions with other companies or receive confidential information about other companies. Such information should be respected in a manner consistent with that outlined here and you must not use that information for your own or someone else's benefit (refer to the Insider Trading section that follows for guidance).



# Non-public Information and Insider Trading

Non-public Information  
and Insider Trading



## Non-public Information and Insider Trading

It is against Bank policy - and, in many countries, illegal - for you to buy or sell securities of JS Bank or another publicly traded company at a time when you possess "material" non-public information about JS Bank or the other company.

In the course of your employment, you may become aware of information about JS Bank or other companies that is not public. Using such information for your financial benefit not only is unethical, but also may be illegal.

Buying or selling securities of JS Bank or any other company while you possess "material" non-public information is known as "insider trading". Passing such information on to someone who buys or sells securities - which is known as "tipping" - is also likely to be illegal, even if you personally never trade in the securities. You may not engage in insider trading or tipping.

The prohibition applies to stock, options, debt securities or any other securities of JS Bank or another company. This prohibition also applies to transfers into or out of the Bank stock fund under a saving and retirement plan.

Violations can subject individuals to significant fines and even imprisonment. Employees in certain business units may be subject to additional specific requirements and restrictions on their personal trading as a result of their job responsibilities.

### Material Non-public Information

You may not trade in the securities of a company about which you possess non-public information that would influence your decision to buy, sell or hold those securities.

Material non-public information is information about a company that is not known to the general public and that could influence a typical investor's decision to buy, sell or hold that company's securities.

Because the determination of "material" is made on a case-by-case basis depending on particular facts and circumstances, if you have any doubt or concern, you must not trade while you possess such non-public information. Examples of non-public information about JS Bank or any other company might include:

- The operating or financial results of the company, or of any of its major business units (including estimates of any future earnings or losses);
- The company's negotiations or its entry into an agreement for an acquisition or sale of a substantial business or other significant transaction;
- Development of a major new product or service;
- An increase or decrease in dividends;



- A stock split or other recapitalization;
- A redemption or purchase by the company of its securities; or
- Major management changes.

Remember the information that may not be material to JS Bank, may in fact be material to a smaller company with which we do business.

Information stops being non-public when it has been effectively disclosed to the public - for example, by a press release, a filing with the appropriate government regulators, or a webcast - and is followed by a reasonable waiting period for the information to be absorbed by the marketplace.

### Disclosure of Non-public Information and Tipping

You may not disclose non-public information to anyone, unless that person has a need to know the information, in order to perform his or her duties, and you believe the person will not misuse the information.

If you reveal non-public information to anyone (even a family member), and that person then buys or sells securities - or passes that information on to someone else who buys or sells securities - you may be liable for tipping, even if you never personally trade on the information. Liability could arise if you were trying to help someone profit from the information or if you were trying to gain something personally, even if only to impress someone with your knowledge.

### Supervision of Others

You must be satisfied that those you supervise understand the insider trading prohibition.

If you have supervisory authority in connection with a matter that involves material non-public information, you must take measures to direct the other employees working on the matter to take appropriate precautions to prevent insider trading violations, for example, you should clearly instruct all members of a working group that they possess material non-public information that they may disclose only on a need-to-know basis, and that they are barred from buying or selling securities of the companies to which the information pertains.

# Money Laundering and Terrorist Financing



## Money Laundering and Terrorist Financing

You must actively guard against the use of the Bank's products and services for purposes of money laundering or for the financing of terrorism or other criminal activity.

Money laundering and terrorist financing have become the focus of considerable attention by governments, international organizations and law enforcement agencies throughout the world. Money laundering is the process by which the proceeds of criminal activity are moved through the financial system in order to hide all traces of their criminal origin. Terrorist financing, by contrast, focuses on the destination and use of funds that may come from legitimate or criminal sources, or a combination of the two.

The Bank fully supports the international drive against serious crime and is committed to assisting the authorities to identify money laundering transactions and where appropriate, to confiscate the proceeds of crime.

You must report to Compliance Officer of the bank suspicious activities such as, suspected insider trading, fraud, misappropriation of funds and money laundering.

Employees, who handle cash, banking, securities, investments, insurance, travel or money service and other funds, transfer transactions for customers, receive training on these policies and procedures. If you perform any of these functions, you must follow your business unit's policies and be alert to identifying the money laundering and terrorist financing risks affecting your business unit. You must be vigilant and exercise good judgment when dealing with unusual customer transactions. You must alert your manager/supervisor to any situation that seems to you to be inappropriate or suspicious. You should not let the customer know that you find the transaction suspicious, although you should ask whatever questions are necessary to better understand the customer's identity, source of funds and reasons for the transaction.

The key principles include the following:

- The identity of a customer beginning a business relationship or conducting a single transaction should be established from official or other reliable identifying documents.  
The Golden Rule is to Know Your Customer.
- Business units must keep record of customer identification for at least five years after the account is closed and of transactions for at least five years after their completion, or longer if the local law requires. These documents should be available to the competent authorities in the context of relevant criminal investigations and prosecutions.



- If business units suspect that funds stem from money laundering, they should promptly report those suspicions to the competent authorities and record the circumstances in writing.
- You will not disclose the fact to the customer or any other quarter that a suspicious transaction or related information was being or has been reported to any authority, except if required by the law.
- When a business unit reports its suspicions to the competent authorities, it should comply with their instructions.

You must immediately contact the Compliance Officer if you are approached in any manner by government agencies concerning a money laundering or terrorist financing investigation. There are strict rules specifying time frames for complying with those inquiries, so your immediate action is vital.





Environmental  
Sustainability

# Environmental Sustainability



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## Environmental Sustainability

### Sustainable Performance

You must act responsibly towards all of our stakeholders

The Bank is committed to generating sustainable value for all of its stakeholders (clients, employees, shareholders, civil society, government) by always considering long-term success over short-term gains. Meeting this commitment is the responsibility of each JS Bank employee.

The Bank believes that balancing environmental with financial priorities is fundamental to sound risk management and a core part of the way we do business

### Our Employees

You must seek to responsibly balance risks and returns

The Bank encourages an entrepreneurial spirit in its employees while seeking to responsibly balance risks and returns. At the same time, the Bank combines a culture of performance with a culture of responsibility to its business and to its surroundings.

### Our Communities

You have a responsibility to reduce your effect on your surroundings

### Mitigating Environmental Risks in our business

You must consider the environmental and social impact of your actions

The Bank takes environmental and social risk issues very seriously, which minimizes potential reputational and financial risk and encourages you to do the same. The Bank applies high environmental and social standards to businesses it supports for a sustainable future. JS Bank's Position Statements outline the environmental and social standards we expect clients and customers to observe with regards to different industries and for you to ensure that they are complied with.

### Our Own Operations

You must participate towards making a safe and healthy workplace for each other

The Bank works hard to make its operations as sustainable as possible. Employees are responsible to reduce their own environmental impact to not only provide a safe and healthy workplace for each other but also for the wider community.



# Other Acts of Misconduct

Other Acts of  
Misconduct



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## Other Acts of Misconduct

It is not possible to list all the forms of behaviors that are considered as misconduct or unacceptable in the workplace, the following are examples of infractions of rules of conduct that may result in disciplinary action, up to and including termination of employment:

- Theft, fraud, dishonesty with business or property of the Bank or any other organization or any person inside or outside the Bank or inappropriate removal or possession of property
  - Falsification of employment documents/data to obtain employment
  - Tampering with the office records
- Negligence or improper conduct leading to damage of Bank-owned or customer-owned property or damage to the reputation of the Bank
  - Conviction for a criminal offence within or outside the office
  - Violation of safety or health rules
    - Smoking in prohibited areas
  - Spitting within Bank's premises
  - Unauthorized absence from duty
  - Illegal strike or go slow tactics
- Misuse of Official Stamps/Letterheads/Telephones/Computers & other items

The Bank, at its sole discretion, shall determine what act or omission constitutes misconduct, breach of trust or negligence of duty



# Compliance with the Code

Compliance  
with the Code



## Compliance with the Code

You must read, understand and comply with the Code. If you have any questions, you are responsible for asking your immediate manager/supervisor for clarification.

If you believe that you have violated the Code or any applicable law or regulation, you must report the violation so that the Bank can take appropriate action. The fact that you have reported the violation will be given consideration in determining appropriate disciplinary action, if any. In many cases, a prompt report of a violation can substantially reduce the adverse consequences of a violation for all involved - third parties, the Bank and you.

If you become aware that another employee, at any level of seniority, has, in all likelihood, violated the Code, including any law or regulation applicable to the Bank's businesses, you have a duty to report that violation so that the Bank can take steps to rectify the problem and prevent a recurrence.

You should report actual or suspected violations to your immediate manager/supervisor, your Human Resource's representative, your Compliance Officer or the Internal Auditor. Such reports will be treated confidentially to the extent possible, and you will not be subject to retaliation for reporting a suspected violation in good faith.



# Disciplinary Action

Disciplinary Action



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## Disciplinary Action

If you fail to comply with the Code or any applicable law or regulation, you will be subject to disciplinary action that may include termination.

Disciplinary measures will depend on the circumstances of the violation and will be applied in a manner consistent with the Bank's policies. Consideration will be given to whether or not a violation was intentional, as well as to the level of good faith shown by an employee reporting the violation or in cooperating with any resulting investigation or plan of remediation.

Disciplinary action will be taken against any employee who:

- Authorizes, directs, approves or participates in violations of the Code of Conduct;
- Deliberately fails to report, or conceals violations of the Code, or deliberately withholds or mis-states relevant information concerning a violation of the Code;
- Retaliates, directly or indirectly, against any other employee because of a report by that employee of a suspected Code violation;
- Any employee who encourages others to do any of the above; and
- Any Manager/Supervisor who, under the circumstances, should have known about a violation by people under his or her supervision, or who did not act promptly to report and correct a violation.





# Responsibilities After Leaving the Bank



## Responsibilities After Leaving the Bank

Employees must not use their position to advance their prospects for future employment, allow their work to be influenced by plans for or offers of external employment which would conflict with, or compromise in, any way the best interests of the Bank.

Your professional duty while being employed by the bank was to maintain confidentiality; therefore, you must maintain the same professionalism and secrecy after leaving the employment of the bank and not disclose any official information. Former members or employees should not use or take advantage of personal, confidential or official information they may have obtained in their capacity as the Bank employee.



## Code of Conduct Booklet Acknowledgment

I hereby acknowledge that I have received and I understand that it is my responsibility to become familiar with and abide by this Code, insofar as it applies to the position in which I am employed with JS Bank Limited.

I also accept responsibility for contacting my supervisor or Human Resource Department if I have any question or concerns or need further explanation.

*(Please sign and return to Human Resource Department)*

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Print Name in Block Letters

