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| <b>HF Group</b>     |                 | <b>Policy Document</b>          |     | <b>Document No. 1</b>                 |  |
| <b>Policy Name:</b> | Code of Conduct | <b>Version no:</b>              | 1.0 | <b>Process Owner:</b> Human Resources |   |
|                     |                 | <b>Prepared By:</b> HR Director |     |                                       |   |

| Version No. | Date                        | Sections Updated | Reason for change | Description of the Change |
|-------------|-----------------------------|------------------|-------------------|---------------------------|
| Version 2.0 | 1 <sup>st</sup> August 2019 | Original policy  | -NA-              | -NA-                      |
|             |                             |                  |                   |                           |

| <b>Approvals</b>   |                |                               |           |      |
|--------------------|----------------|-------------------------------|-----------|------|
|                    | Name           | Job Title                     | Signature | Date |
| <b>Approved By</b> | Tom Shivo      | Human Resources Director      |           |      |
| <b>Approved By</b> | Robert Kibaara | Group Chief Executive Officer |           |      |
|                    |                |                               |           |      |

| <b>Effective Date</b> |        |      | <b>Next Review Date</b> |      |
|-----------------------|--------|------|-------------------------|------|
| Date                  | Month  | Year | Month                   | Year |
| 01                    | August | 2019 | July                    | 2022 |
|                       |        |      |                         |      |

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**1.0 INTRODUCTION**

This policy on Staff Code of Conduct has been adopted with a view to clarify to Staff the conduct expected in the performance of their duties and to provide them with a guide to ethical issues.

It is recognized that whereas no written policy can anticipate every ethical dilemma or definitively set forth the appropriate action for all business situations, this Code of Conduct emphasizes a standard of ethical conduct that must permeate all the business dealings and relationships.

**2.0 POLICY STATEMENT**

The Staff Code of Conduct is critical in setting the proper tone in the organization, creating and maintaining a culture of honesty, high ethics, good conduct and unquestionable personal integrity within the wider framework of the Company’s core values. As a custodian of public funds, HF Group has the responsibility to safeguard its integrity and credibility in order to maintain public confidence. This is a vital ingredient in the banking business, which calls for both confidence of the public in the safety of their deposits and professional conduct of staff. The professional and private conduct of Staff is a critical window in influencing the public’s confidence in the Company.

Adherence to the Company’s Code of Conduct is a condition of employment. All employees are required to comply with the Code of Conduct without exception or waiver.

**3.0 POLICY OBJECTIVES**

Confidence is a vital ingredient in the banking business as it mirrors the public perception of the level of safety for their deposits and trust in the Company. The objectives of the policy are to:

- Safeguard the integrity and credibility of HF Group
- Maintain public confidence
- Comply with International Standard on Auditing (ISA 240), which requires management to implement measures to guard against the risk of fraud.

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#### 4.0 POLICY PRINCIPLES

To help ensure adherence:

1. All Staff Members are to sign a declaration of their observance of the code of conduct, upon joining the Company and thereafter, at least once a year, by 31<sup>st</sup> January of every year.
2. Staff must comply with the code of conduct in their day to day work
3. Any observed cases of non-compliance must be reported to the Divisional Head or Human Resource Director or the Group Chief Executive Officer
4. Lack of compliance will lead to disciplinary measures including summary dismissal, as per the Company Disciplinary Policy.

#### 5.0 SCOPE OF THE POLICY

The policy applies to all employees of HF Group, permanent and contract. In addition, other persons performing services for the Company may be subject to the Code of Conduct by agreement.

All members of staff should always conduct themselves at all times with decorum, be temperate in their habits, avoid extravagance and refrain from associating with persons of questionable reputation. This is both within and outside the business of the Company.

#### 6.0 KEY ASPECTS OF THE POLICY

##### 6.1 CONFLICT OF INTEREST

Members of staff must not engage directly or indirectly in any business activity that competes or conflicts with the Company's interests. These activities include but are not limited to:

- a) **Outside financial and/or business interest:** Staff are not to get into any situation where their personal interests conflict or appear to conflict with the interest of the Company or its customers. This applies within and outside the official business hours. Engagement in business or employment outside the Company is considered a conflict of interest if it is

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conducted during the business hours. Where the acquisition of any business or participation in any business activity outside the Company premises and outside office hours demands excessive time and attention from the member of staff, thereby depriving the institution of the employee's best efforts on his/her job, a conflict of interest is deemed to exist. Where members of staff have a financial interest in a business, whether as a sole proprietor, partner, shareholder, creditor or debtor where a conflict of interest exists, such interests must be disclosed immediately to the Human Resources Director and written approval sought. If there are any doubts about the issue of conflict of interest, it is best to seek written clarification from the Human Resources Director as early as possible.

- b) **Other employment:** Before making any commitment, staff are to discuss possible part-time employment or other business activities outside the Company's working hours with their Managers and Divisional Directors and Human Resources Director. A written approval of the Human Resources Director must be obtained before an employee embarks on part time employment. Approval should be granted only where the interest of the Company will not be prejudiced.
- c) **Corporate Directorships:** Staff must not solicit corporate directorships. A staff should not serve as a Director of another corporation without the approval of the Group Chief Executive Officer. However, staff may act as directors of non-profit organizations such as religious, professional bodies, educational, cultural, social, welfare, and philanthropic or charitable institutions.
- d) **Trusteeships:** Staff must not seek appointments as executors, administrators or trustees of customers' estates. If such an appointment is made and the staff member is a beneficiary of the estate, his signing authority for the estate's bank account(s) must be approved by the Human Resources Director /Group Chief Executive Officer.

## 6.2 MISUSE OF POSITION

Misuse of position includes but is not limited to the use of the Company's name or facilities to obtain personal advantage in political, investment, retail or other transactions and activities. This includes soliciting and accepting any gifts or favours.

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- a. **Procurement:** Staff must not participate in, or influence the purchase of goods or services from any company in which that Staff has a direct or indirect interest
- b. **Preferential treatment on staff benefits:** Staff must not extend to relatives, friends or other third parties the benefits and preferential rates accorded to them by the Company by virtue of their employment. This includes use of preferential mortgage rates, zero rated charges on services such as standing orders, provision of account statements, car insurances etc
- c. **Use of Company name:** Staff must not use the Company’s name or facilities for personal advantages in political, investment or retail purchasing transactions, or similar types of activities. Staff and their relatives must also not use their connection with the Company to borrow from or become indebted to other people. The use of position to obtain preferential treatment such as purchasing of goods, shares and other securities is prohibited.
- d. **Use of Company Facilities:** Acts of dishonesty involving theft, misuse, destruction, misappropriation of money, property, office equipment, supplies or any other items of value are prohibited. Staff are to protect and properly use the Company’s property including computers and internet access for the Company’s business only.

Staff must not use Company facilities, vehicles, equipment, stationery or any other material facility for non-Company or non-official or their personal use. Where the management has authorized use of Company facilities such as use of telephones for personal use, the cost must be recovered in the prescribed procedures.

Further, Staff must not use the Company’s facilities and influence for speculating in commodities, foreign exchange or securities, whether acting personally or on behalf of friend or relatives. Such misuse of position may be ground for dismissal. Staff should not also engage in ‘back-scratching’ exercises with other parties to provide mutually beneficial transactions in return for similar facilities, designed to circumvent these ethical guidelines.

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- e. **Frauds, Forgeries and Defalcations.** Any unlawful making of misrepresentation which causes actual prejudice or which is potentially prejudicial to the Company, customers or suppliers will be ground for immediate summary dismissal and prosecution in line with the Fraud Control Policy.
- f. **Intellectual Property, Trademarks, Copyrights and Patents.** Staff are to protect and where appropriate enforce the Company’s intellectual property rights. Staff are to protect the Company’s trademarks, copyrights, patents, documentation, training material, computer codes, publications, and other works of authorship they develop for the Company. In the course of their work, Staff may create, discover or develop software, methods systems or other patentable inventions when performing their responsibilities or utilizing information or resource available in connection with their employment. To the extent permitted by law, as an employee or a contractor all such works of authorship and invention whether or not patentable or protectable by copyright trade secret or trademarks are assigned to the Company.

In the same way, Staff must respect the intellectual property belonging to third parties. Staff must not load unlicensed software in their computers.

- g. **Soliciting and/or acceptance of gifts, favours, and inducements:** Staff must not solicit or accept directly or indirectly, any cash or monetary equivalents, gifts, tokens or any objects of significant value or preferential treatments from any person or enterprise that has or is seeking business with the Company where doing so may influence, or appear to influence their business judgment. Indirect gifts can include gifts to family members. Gifts or tokens of significant value are those above the value of KSh 1,000 in which case such gifts must be declared and treated like Christmas gifts.

Staff must not solicit or accept gifts or inducements either directly or indirectly whether in cash or in kind in order to provide any favour to a customer in the provision of loans, acceptance of deposits or any other conduct of the Company which they are entrusted either jointly or individually.

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Conversely Staff must also not offer excessive gifts or entertainment to others whose business the Company may be seeking.

It is against Company policy to engage in any form of bribery, corruption, including the offer or acceptance of any payments, gratuities, kickbacks, to obtain or retain business or secure services. Staff must not make any expediting or facilitating payments that may be demanded by government personnel to take routine action to which the Company is entitled under applicable law.

- h. **Christmas Gifts and Tokens.** Where Christmas gifts, or such other festive seasons gifts are given in appreciation of work well done or in appreciation of the business relationship, no member of Staff shall individually receive a gift. All gifts received will be pooled together and a raffle conducted to give equal chance for all Staff. Staff may only accept gift tokens such as calendars and diaries only when the value involved is not significant and clearly will not place them under any real or perceived obligation to the donor.

**6.3 PERSONAL FINANCIAL RESPONSIBILITY**

Staff must be especially careful in the management of their personal finances. Staff should practice the principle of living within their means, must never overdraw their accounts or place themselves in circumstances that could lead to their financial embarrassment or reflect unfavorably on the Company. Providing the Company with false information about one’s financial position will lead to disciplinary action as per the disciplinary policy.

Soliciting funds from colleagues is prohibited.

**6.4 MISREPRESENTATION**

Misrepresentation of any form in material fact by a prospective employee during the recruitment, selection, appointment and deployment process shall be sufficient and mandatory ground for summary termination or an employee’s employment at any time. If it becomes evident, subsequent to an employee’s appointment that the employment in a given

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capacity was the result of the submission of materially misleading information, the employment shall be annulled without prior notice and without compensation.

Materially misleading information includes false, unreliable or flawed information or declaration, false recommendation, falsified certificate or any other way for the employee assuming an untrue identity, qualification or personality or of the employee deliberately concealing or keeping silent concerning an incident or circumstance relevant to the Company’s employment requirements.

In such circumstances, annulment shall be the case irrespective of whether even if the information had not been misrepresented, the offer of employment would still have been made to the employee. This policy applies to all positions in the Company and for the entire duration of an employee’s employment with the Company.

### 6.5 OFFICE ATTIRE

Staff grooming and personal appearance are important aspects of how others perceive the Company through us. Staff appearance must inspire confidence, convey professionalism and must never be careless or untidy. The office attire must be suitable for conducting business on behalf of the Company at all times. It must always be smart and presentable. It must also be culturally sensitive to the sense of decency for the people in that location. Jeans, T-shirts and sandals are not considered suitable office wear. Where the corporate dress or uniform is provided, Staff must ensure they use them appropriately. Friday is a dress down day where Staff are provided with corporate shirts. When the corporate shirt is not worn, Staff should don formal business dress.

### 6.6 CONFIDENTIALITY

All Staff are enjoined to observe secrecy pursuant to the provisions of the Banking Act and Central Bank Regulations. Provisions of the Banking Act requires that all information on the operations of Banks and Financial Institutions must be treated with utmost confidentiality and that it should never be divulged to unauthorized parties. Further, Central Bank of Kenya Prudential Guideline on confidentiality requires that members of staff must take precaution to protect the confidentiality of customer information and transactions. No member of staff

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should during, or upon and after termination of employment with the Company (except in the proper course of duty and/or with the Company's written consent) divulge or make use of any secret correspondence or accounts of the Company or its customers. Staff are required to keep strict confidences, sign the declaration of confidentiality once every year and take precautions to protect confidentiality of the Company, its customers and its Staff. Staff are required to strictly follow the standard procedures that guide disclosures of information to other Staff or to external parties.

Also, Staff are to safeguard the privacy, confidentiality and security of employee data and respect and maintain the confidentiality of information staff learn about other colleagues. Such information includes but is not limited to salaries, health status, disabilities etc. Staff must not share this information with anyone inside or outside the department, except as is necessary to perform his or her role.

**Public Statements:** In communicating information regarding the Company by way of public statements, press releases, interviews with the media and other such public statements, the offices responsible are those of the Chairman, Group Chief Executive Officer and/or Subsidiary Directors. Any requests for interviews with the media must be channeled to those offices.

**Research On the Company.** Staff are not to carry out research including research for academic purposes, based on the Company without written authority from the Group Chief Executive Officer or Human Resources Director.

## 6.7 RECORDS AND REPORTS

All records and reports that each Staff member is responsible for must be accurate and complete. Staff should never make or facilitate false entries, or obscure the true nature of a transaction. They are never to mislead as to the true authorization limits or approval by the relevant authority. Access to and use of all records, computer files or programmes of the Company must be limited to authorised persons and for the Company's use only.

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## 6.8 REPORTING OF FRAUD, RISK, IRREGULARITIES AND ERRORS

Personal integrity is of utmost importance for the Company. Staff may at some time become aware of a security risk, fraud, theft, misuse, misappropriation, errors and other irregular or unethical practices. Even if it involves a more senior Staff, it is the duty of the employee to inform their Divisional Director or Manager Security or Human Resources Director without delay. Staff are to report such incidences as per the Fraud Control Policy.

If Staff suppress that information, they could later appear to have been part of a conspiracy. However, it is important to remember that directly and immediately confronting a suspect with an accusation could lead to personal danger, destruction of vital evidence, a cover up and an improbable accusation. It is thus better to promptly make a clear report of suspicion to the authorized people as indicated above. Irregularities by junior staff will not be excused on the plea that they were acting under orders of their supervisors.

## 6.9 LEGAL AWARENESS

Because of the nature of the business of the Company, Staff should be aware that their activities have quite high legal significance. The important thing is that the actions by Staff should always be guided by professionalism, good competent practice, courtesy and good taste in all situations. Staff are expected to properly understand and maintain the professional standards of their position and to conform to the accepted ethics, norms, customs, good and prudent practice.

## 6.10 GAMBLING, ALCOHOLISM AND SUBSTANCE ABUSE

Gambling, consumption of alcohol and drugs are not permitted and are sufficient causes for disciplinary action including summary dismissal. Gambling even during Staff free time is completely prohibited.

Staff should not be under the influence of alcohol or drugs while acting on behalf of the Company

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All work premises of the Company are smoke free zones. Staff should not smoke whilst within the premises or inside vehicles of the Company.

### **6.11 COMMUNICATION WITH CUSTOMERS AND COLLEAGUES**

The aim of the Company is to provide a highly efficient and impartial service to customers. Staff must communicate with customers and colleagues courteously, clearly and effectively. The official working language with colleagues is English. Staff are to desist from using vernacular while speaking with their colleagues.

So far as possible, staff should use plain language and avoid ambiguity, obscurity and unnecessary use of technical jargon while speaking with customers.

Staff are required not to use any offensive, abusive, insulting or quarrelsome language to other staff or customers.

The Company adopts open communication, open door policy and covert interactions between all Staff in the pursuit of fairness and equal opportunity. Anonymous mail to any person regarding any issue or staff will not be acknowledged or issues raised addressed.

### **6.12 WORKING HOURS**

Staff should strictly observe the official working hours and be conscientious about punctuality.

### **6.13 HANDLING CUSTOMERS**

All customers, internal and external are to be handled courteously, promptly and fairly at all times. Customer complaints should be handled courteously, promptly and fairly in the Company's commitment to high quality service. Unless a complaint is resolved immediately

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to the customer’s satisfaction, it should be taken up with the immediate supervisor or a senior member of Staff.

All customer complaints, verbal or written should be logged in the customer complaint registers to help track issues.

### **6.14 HEALTH, SAFETY, ENVIRONMENT AND SECURITY**

Everyone, whether Staff, customers or other visitors needs a safe and secure environment. Staff should take reasonable precaution to protect their security and safety, and that of their colleagues, customers, visitors and general public in line with the policy on Health, Safety and Environment.

To ensure the security of confidential information, Staff must clear their desks of all business related and other confidential material at the end of each day. They must also lock their desks, filing cabinets and doors whenever they depart.

Everyone must display his or her identification badge at all times within the premises as required by security regulations.

### **6.15 HARASSMENT AND DISCRIMINATION**

Staff are to treat all colleagues and customers with respect, dignity and provide a supportive working environment. Staff must apply the principles of fairness and equity in their work by always treating others with sound professional judgment, not being influenced by personal bias, friendship or external factors.

Harassment is any unwelcome statements, jokes, other verbal and non-verbal or physical actions which demean other people whether intentionally done or not. Such inappropriate conduct may for example be on the basis of:

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- i. Sex. Where one makes sexual advances, requests for sexual favours or otherwise sends verbal or physical signals of a sexual nature which make the other person feel threatened or compromised in any way
- j. Race – where one treats others based on their tribal, or ethnicity or racial personal orientations, personal prejudices, attitudes and beliefs
- k. Disability of any form.

Staff must be sensitive to other people’s feelings, and viewpoints and not let personal Conflicts or prejudices get in the way of their work.

#### **6.16 TRAVEL, EXPENSE AND OTHER BENEFIT ACCOUNTS**

Staff are to claim reimbursement only for actual and reasonable business-related expenses that are properly documented approved and in accordance with the Company’s policies and procedures.

#### **6.17 INFORMATION COMMUNICATIONS TECHNOLOGY**

The use of Information & Communication Technology (ICT) has brought many exciting new opportunities, but can also cause problems if misused. Staff must regard access to our ICT facilities and systems as a privilege, not a right. Staff are allocated User IDs (Names) and are required to set a password on their network accounts and any associated systems and to take full responsibility for the management of their user accounts, including the secrecy of their passwords. The following must be strictly adhered to:

- Not write down any password
- Not tell anyone the password
- Not make the password too easy to guess (e.g. favorite football team)
- Ensure that the passwords are regularly changed.

The ICT Department can monitor staff activities on the network at any time and any staff found to be misusing the ICT facilities will have access to the Network service and facilities withdrawn and liable for disciplinary action as per staff disciplinary policy.

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### ICT and the Law

The following legal points should be taken into account with regard to ICT. It is against the law to:

- Access (or try to access) the data and/or network account of another individual.
- Access (or try to access) software or hardware for which authorization has not been given
- Bypass (or try to bypass) any security measures placed on the network or any systems or computers.
- Introduce a virus onto the company's networks and systems
- Any further criminal activity involving any of the above actions.

### General Use of Computers

The following apply to all users of ICT facilities at HF Group.

- ICT resources must not be used to display, store or transmit data that may be considered as offensive, defamatory, libelous or otherwise inappropriate
- It is the responsibility of the staff not to seek out unacceptable information or use ICT resources inappropriately
- The use of personal external devices and software (e.g. memory sticks and CD-ROM's) are not permitted on the network
- It is against policy to play music on company computers.

### Using the Internet

The Internet Service Provider (ISP) generally filters Websites, but the ICT Department can also block websites that are inappropriate or unsuitable. The following rules must be followed when using the Internet:

- It must not be used to display, store or transmit data that may be considered as offensive, defamatory, libelous or otherwise inappropriate
- Staff must not attempt to access information that is racist, sexist, obscene or offensive to others
- Staff are not permitted to download any files unless there is a clear business reasons for doing so
- The playing and/or downloading of on-line games, music etc is not permitted.

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**6.18 DISCIPLINARY ACTION**

Staff are to read, understand and comply with the Code of Conduct. Failure to comply with the Code or any other regulations will be subject to disciplinary action that may include termination in line with the Disciplinary Policy.