

Code of Ethics and Conduct

Alubaf Arab International Bank

Date of Issue: 16 February 2015

Table of Contents

A- Introduction

1. Compliance with Laws, Rules and Regulations and best practices
2. Act Responsibly, Honestly, Fairly & Ethically
Fair & Equitable Treatment
3. Avoid Conflicts of Interest
Employees Must Declare Outside Employment & Certain Other Activities
Members of the Management Committee & Directors Must Declare Outside Internet
4. Insider Trading
5. Related Parties Transactions
6. Competition, Fair Dealing and Avoiding Compromising Gifts, Entertainment & Hospitality
7. Reject Bribery, Kickback & Corruption
8. Discrimination and Harassment
9. Working Environment
10. Record-Keeping, Financial Controls and Disclosures
11. Confidential and Proprietary Information
12. Protection and Proper Use of Bank Assets
13. Reporting any Illegal and Unethical Behavior
14. Improper Influence on Conduct of Auditors
15. Financial Reporting
16. Prevent Money Laundering & Terrorism Financing
17. Speak up // Whistle Blowing
18. Compliance Procedures
19. Staff Authority
20. Complains and Breaches
21. Staff Personal Commitment
22. References and Appendixes

A- Introduction

This Code of Ethics and Conduct of Ethics and Conduct is designed to guide Employee & Board Members at Alubaf Arab International Bank through ethical and professional conduct required in a reputable financial institution.

All Directors and employees of the Bank (together referred to as “Personnel”) are expected to become familiar with the Code of Ethics and Conduct and to adhere to those principles and procedures set forth in the Code of Ethics and Conduct.

The purpose of the Code of Ethics and Conduct is to provide the basic principles to guide Personnel in day-to-day activities. The Code of Ethics and Conduct does not cover every legal or ethical issue that may be confronted at the Bank. Indeed, no Code of Ethics and Conduct can attempt to anticipate every issue that may arise.

However, by following the Code of Ethics and Conduct, by adhering to the letter and spirit of applicable laws, regulations, policies and procedures, and above all by applying sound judgment to all activities, Personnel can demonstrate commitment to the Bank’s values, mission and objectives.

The guidelines and principles which make up the Code of Ethics and Conduct are based on accepted standards of business and personal conduct. Importantly, the Code of Ethics and Conduct is aligned with the Banks Mission Statement and linked to Alubaf Bank Objectives as given HR policy.

This Code of Ethics and Conduct outlines the minimum standards of behavior expected from all Personnel. Those who violate the standards in this Code of Ethics and Conduct will be subject to counseling and depending on the nature of the violation, possible disciplinary action up to and including termination of employment or service.

It is important to read the Code of Ethics and Conduct, and to review it from time to time to ensure that we are in compliance. The Code of Ethics and Conduct is posted on HR drive where it will be updated when required. We are all required to affirm in writing that we have read and understood the Code of Ethics and Conduct and that we will comply with it, including amendments thereto.

For employee, if you have any questions or concerns after reading this Code of Ethics and Conduct, or if any time you feel uncertain about a course of action, you are encouraged to raise the matter with your manager who, if necessary, can seek the advice of your Human Resources **OR** Compliance department. If you are not comfortable in speaking with your manager about this matter, or if your manager is not fully responsive to your concern, communicate directly with the Head of Human Resources **OR** Head of Compliance.

1. Compliance with Laws, Rules and Regulations.

We are all required to comply with the law and regulations. Cognizant of that responsibility, you can fulfill it by complying with Alubaf Bank policies, procedures and guidelines; they are designed to reflect applicable laws and regulations as we as industry. It is the responsibility of managers to be aware of the relevant legal requirements pertinent to the activates of their business or functional units, as we as industry standards, to ascertain that they are properly reflected in Alubaf Bank policies and procedures (and recommend amendments where required) and to ensure that their staff comply and follow them.

This course includes, without limitation, the requirements, employment legislation, and of critical importance:

- Regulations on combating money laundering and the financing of terrorism (which includes compliance with all required Know your Customer and Customer Due Diligence measures): and
- Regulations on inside information and the misuse of that information, insider trading and market abuse.

It is Staff responsibility to comply with all these legal and regulatory requirements applicable to your role within Alubaf Bank, on these and other topics.

2. Act Responsibly, Honest, Fairly & Ethically.

In all circumstances, staff must act with integrity, the hallmark in which Alubaf Bank has built its reputation. Ethical behavior, honestly fairness ad sense of responsibility must be evident at all times in all dealings and communications (including e-mails and correspondence) whether with customers, regulators, colleagues or other stakeholders.

Fair & Equitable Treatment

Employee must treat all colleagues fairly and equitably Alubaf Bank is committed to maintain a work environment that supports the productivity, personal goals, dignity and self-respect of all employees, free of offensive behavior, intimidation and harassment. The same principles of fairness apply to all your dealing with customers, suppliers and other stakeholders; it is our policy not to take unfair advantage of others through manipulation, concealment or abuse of privileged information, misrepresentation of material facts, or any other unfair business practice.

3. Avoid Conflicts of Interest.

All business decisions must be made, and all business activities conducted, in the best interest of the Bank. Directors, employees and all other parties conducting business on behalf of the Bank, must avoid any action, which may involve, or may appear to involve a conflict with the interest of the Bank.

Example of when dose the Conflict of Interest Exist?

A “ conflict of interest” exists when a person’s private interest interferes in any way – or even appears to interfere. A conflict situation can arise when an employee or officer or director takes actions or has interest that may make it difficult to perform his or her Bank work objectively and effectively. Conflicts of interest may also arise when an employee or officer or director or a member of his or her family, receives improper personal benefits because of his position in the Bank. Loans to, or guarantees or obligation of, employees, officers, and their family members by the Bank will create conflicts of interest.

It is conflict of interest for an officer and director to work for a competitor, customer or supplier. The employee, officers and directors should avoid any direct or indirect business

connection with the customers, suppliers or competitors, except as required on behalf of the Bank.

To clarify it more a perception of conflict of interest exists whenever you are in a situation where:

- A. Your personal interest could conflict with your obligations to Alubaf Bank
- B. Your personal interests could conflict with your obligations to a customer or
- C. Alubaf Bank interest could conflict when its obligations to a customer, or its obligations to one customer could conflict with its obligations to another customer.

Conflicts of interest are prohibited as a matter of Bank policy, except as approved by the Board of Directors. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor or follow the procedures set out in item 18 of this Code of Ethics and Conduct. Employees must disclose all actual and potential conflicts of interest between them and the Bank to Human Resources Directors should immediately disclose all actual and potential conflicts to interest to the Banks Audit committee.

Employees Must Declare Outside Employment & Certain Other activities.

Alubaf Bank cannot obtain or maintain any outside employment, part-time work, consultancy arrangement, freelance activities, directorship or managerial position (paid or otherwise, including with not-for-profit organization), political appointment or any other similar activity, without written disclosure to the Head of Human Resources. The same rule applies for any other activity or interest that could create a conflict of interest for the employee.

Without the CEO permission, personnel should not be employed by others, nor should they otherwise engage in any other business nor assume a position to generate a business profit. It is acceptable however for Personnel to hold honorary positions in clubs, charitable organizations or there similar associations providing the performance of their Bank duties is not affected in anyway and providing also that there is no conflict created with the Banks interest with prior approval of Human Resources.

Members of the Management Committee & Directors Must Declare Outside Interests.

Members of Alubaf Bank Management as well as members of the Board of Directors must declare in writing to the Board, through the Audit Committee, all of their interest and activities in other enterprises (whether as a shareholder of above 5%, of the voting capital, as manager, as director or through any other form of significant participation).

4. Insider Trading.

All non-public information about the Bank should be considered confidential information. Employees and Directors who have access to confidential information about the Bank or any entity are not permitted to use or share that information for trading purposes in Bank or the other entity's securities or for any other purpose except the conduct of the Bank's business.

To use non-public information for personal financial benefit of to “tip” others who might make an investment decisions on the basis of this information is not only unethical but also illegal.

5. Related Parties Transactions.

Related Party Transactions are governed by the Bank’s Related Transaction Policy, which states the rules, and procedures that govern such transactions. Any credit extension to the Bank is related parties, including Board Members , are made in accordance with the same terms and conditions as applied to other customers without any preferential terms and in conformity with the instructions issued by the Central Bank of Bahrain. Related Party Transactions must be disclosed in line with the requirements of the Central Bank and other regulatory authorities.

6. Competition, Fair Dealing and Avoiding Compromising Gifts, Entertainment & Hospitality.

The Bank seeks to outperform competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent, or inducing such disclosures by past or present employees or any other person of other companies is prohibited. The staff should endeavor to respect the rights of and deal fairly with the Bank’s customers, suppliers, competitors and employees. No employee or officer or Director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

No employee or officer or director is permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal anti-competitive activities.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationship, not to gain unfair advantage with customers. No gift or entertainment should ever be offered, given, provided or accepted by any Bank employee or officer or director, family members of an employee or officer or director unless it is as per the following rules of Accepting Gifts:

Accepting Gifts:

As a general rule, gifts should not be accepted from suppliers or from customers. However, it is recognized that the giving and receiving of small gifts is a common business practice which can be properly managed, provided that employees observe the highest standards of integrity and avoid situations which could adversely affect their decisions or actions. Personal judgment must always play a part in distinguishing between what is an acceptable gift and what is not. Examples of inappropriate gifts and entertainment include the following:

- Any gift of money;

- Any gift or offer of hospitality or entertainment of significant value. As a guide, this would be gifts or entertainment in excess of US Dollar 125 or its equivalent in local currency;
- Any offer of a gift or entertainment where the acceptance of such could raise concerns regarding a conflict of interests or impropriety;
- The purchase of goods or service from a Bank supplier at a price lowers than that available to the general public (other than where a Bank-wide discount scheme is in existence)

Similarly, gifts or entertainment should not be offered to business contacts if the action could be alleged to have an ulterior motive or if the action could cause embarrassment to the Bank or to its employees or clients.

To maintain business integrity, all employees should notify Human Resources whenever gifts or entertainment are offered on a scale to be considered unreasonable, or if any one individual or organization makes regular or repeated offers.

In cases where gifts or entertainment exceed the prescribed limit above, the cases are to be reported to Human Resources (please refer to appendix 1)

7. Reject Bribery, Kickbacks & Corruption

Alubaf Bank strictly prohibits any form of bribery, kickback, payoff and any other improper payment, gifts, contribution, benefit, or any other inducement having a similar corruptive effect, whether in cash (including cash equivalent, cashable items or financial instruments of any kind) or not.

Consequently:

- a) It is prohibited to offer or give, directly or indirectly, any bribe. Kickback, payoff or any other improper payment gift, contribution, benefit or inducement in trying to obtain or retain business or secure services for Alubaf Bank, or to illegally influence any government decisions or actions.
- b) Similarly, it is prohibited to solicit or receive, directly or indirectly, any payment, loan, extension of credit, guarantee, gift, object of any value, or any kind of preferential treatment from a third party in exchange for favorable treatment or consideration with regards to a transaction or dealing of engagement (including the procurement of goods or services) of any kind with Alubaf Bank. This prohibition extends to all members of employees family as well as dependents, and to any third party who may benefit at employees direction.

Should you become aware of any such situations, or if you suspect that an attempt at bribery, kickback, or corruption is being made, you must report it immediately to your manager and to your Compliance Officer.

8. Discrimination and Harassment

The diversity of the Bank's employees is a tremendous asset. The Bank is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, color, religion, gender, national origin or any other protected class.

9. Working Environment

The Bank strives to provide each employee, officer, director and visitors with a healthy , safe and secure environment that reflects the corporate visibility of the Bank as a modern and professional institution. It a collective and individual responsibility for each manager, officer, employee for maintaining a safe and healthy workplace for all employees. Managers are responsible for ensuring that staff are aware of any potential work hazards and are trained in safe work practice and for each staff is responsible for taking all reasonable and necessary precautions to ensure his own safety as well as that of his colleagues, and for familiarizing himself with health and safety guidelines in the workplace by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe or conditions. Violence and threatening behavior are not permitted.

Employees, officers, Directors are expected to perform their Bank related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances, possession, use, or being under influence of the above on Alubaf Bank premises is strictly prohibited.

10. Record-Keeping, Financial Controls and Disclosures

The Bank requires honest, accurate, and timely recording and reporting of information in order to make responsible business decisions. The regulatory authorities require certain records of banking and financial institutions to be retained for a number of years for reference purposes. For example, Customer identification records are to be maintained permanently and Transaction records must be retained as per Anti-Money Laundering (AML) requirements for five years from the date of transactions. For closed accounts, identification documents to be maintained until 5 years after the date of closure of the account. All business expenses accounts must be documented and recorded accurately in a timely manner. If employee, officer and director are not sure whether a certain expense is legitimate, ask your supervisor or manager.

All of the Bank's book, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Bank's transactions, must be promptly disclosed in accordance with the applicable laws and regulations and must conform both to applicable legal requirements and to the Bank's system of internal controls. Business records and communications often become public, and avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to e-mail, internal memos, and formal and informal reports. Records should always be retained or destroyed according to the Bank's record retention policies.

11. Confidential and Proprietary Information

Personnel are all responsible for the safeguarding of confidential and proprietary information, whether it is information disclosed to us by our customers, information regarding Bank's business and activities, or information about Personnel themselves.

Information about the Bank, its customers, its employees and others

Personnel should maintain all confidential and proprietary information in strict confidence, except when disclosure is authorized by the Bank or required by Law.

“Confidential information” is information that is not generally known to the public about the Bank, its customers, or other parties with whom the Bank has a relationship and who have an expectation of confidentiality.

“Proprietary information” includes all non- public information that might be useful or of commercial value to competitors or that could be harmful to the Bank or its customers if disclosed.

Do not participate in Unauthorized Public Statements

Employee must not participate, directly or indirectly in any public statement(whether through the press, radio, internet, television, publications, interviews, presentations or otherwise) that make reference to Alubaf Bank, without prior permission of the chief Executive Officer on his delegate, or the Chairman (in case of a Director). Your duty of discretion after you are longer associated with Alubaf Bank.

Special rules regarding customer information

All personnel have a special responsibility to protect the confidentiality of information related to our customers. This responsibility is imposed by law, and may also arise out a agreements with our customers, or be based on internal rules adopted by the Bank. Unless a customer has consented in writing to the release of their information for a specific purpose, it should never be disclosed to anyone outside Bank except as permitted by law and for legitimate business purposes. Even within the Bank, customer information should always be treated in accordance with the above principles.

Example of Confidential Information is any information that is not available to the public.

It includes, without limitation, non-public

- Information received from a customer
- Sensitive personal information received from or about a director, an employee, a consultant or other business partner of Alubaf Bank
- Information about any customer’s information account of other activities at about Alubaf Bank as well as Alubaf Bank internal assessment of the customer’s creditworthiness
- Proprietary information about Alubaf Bank own business or financial conditions, including information posted on Alubaf Bank internal intranet websites; and not publicly disclosed
- Customer lists and customer contact information
- Data and knowledge that has been created or developed by Alubaf Bank or by any employees, representatives, directors or agents (including you) or that has otherwise become the property of Alubaf Bank

12. Protection and Proper Use of Bank Assists

All employees, officers and Directors should protect the Bank’s assists and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Bank’s profitability.

All Bank assets are to be used for legitimate, efficient and proper use for Bank purposes in order to manage cost, protect its assets and maximize value. Any suspected incident of fraud or theft should be immediately reported for investigation. Bank assets should not be used for non-Bank business.

The obligation of employee, officers and directors to protect the Bank's assets these include not only physical property, but also other tangible assets such as the Bank's proprietary information. Proprietary information includes intellectual intangible property such as trade secrets, patents, trademarks, and copyrights. Other proprietary information and know-how as well as business, marketing and service plans, engineering and manufacturing ideas, designs, database, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of the Bank's policy. It could also be illegal and result in civil or criminal penalties.

Example of staff processes to protect bank assets

All staff within Alubaf Bank should ensure to process the following to protect the bank assets:

- Use their best efforts to safeguard assets and use these assets in accordance with policies and procedures, comply with security programs that help prevent their theft or unauthorized use, and abide by all regulations or contractual agreements governing their use.
- Take all necessary actions and precautions to safeguard all passwords and identifications Code of Ethics and Conducts and prevent unauthorized access to information systems resources
- Protect from misuse or disclosure all non-public information such as business strategies, financial results, pending transactions or contracts, new products, and research results
- Will not use, share or disclose non-public information gained in the course of your employment or other relationship, whether for your own personal benefit or gain, or for any other reason, except in the legitimate course of doing business
- When performing work on behalf the bank, they are not entitled to an expectation of privacy with respect to information technology resources, except where provided by local law
- All computer data created, received or transmitted using Alubaf Bank's information technology resources is the property of Alubaf Bank and is not to be considered the private information of the user.
- Are required to be familiarized with the Alubaf Bank policy on information security

13. Reporting any illegal or unethical Behavior

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed behavior, which they believe may be illegal or may imply a violation of this Code of Ethics and Conduct of Ethics and Conduct or Bank policy or when in doubt about the best course of action in a particular situation. It is the policy of the Bank not to allow

retaliation for reports made in good faith by employees of misconduct but others. Employees are expected to cooperate in internal investigations of misconduct.

14. Improper Influence on Conduct of Auditors

You are prohibited from directly or indirectly taking any action to coerce, manipulate, mislead or fraudulently influence the Banks indecent auditors for the purpose of rendering the financial statements of the Bank materially misleading.

Prohibited actions include but are limited to those actions taken to coerce, manipulate, mislead and fraudulently influence an auditor;

1. To issue or reissue a report on the Banks Financial statements that is not warranted in the circumstances (due to material violations of generally accepted accounting principles, generally accepted auditing standards or other professional or regulatory standards
2. Not to perform audit, review or other procedures required by generally accepted auditing standards or other professional standards
3. Not to withdraw an issued report
4. Not communication matters to the Banks Audit Committee

15. Financial Reporting

The Bank expects employees and officer to take this responsibility very seriously and provide prompt and accurate answers to inquiries related to the Banks public disclosure requirements.

The Bank policy is to comply with all financial reporting and accounting regulations applicable to the Bank. If any employee or officer has concerns or complaints regarding accounting or auditing matters of the Bank, then he or she is encouraged to submit those concerns by one of the methods described in item 18 of this Code of Ethics and Conduct.

16. Prevent Money Laundering & Terrorism Financing

The Bank has established Anti-Money Laundering Policy and procedures designed to ensure compliance with applicable laws and regulations regarding money laundering. Personnel should become familiar and ensure their compliance with this procedure, which is available in the Banks Intranet.

Personnel should also understand their obligations to be alert and report unusual or suspicious activity to the Money Laundering Reporting Officer (located within the Compliance Department).

Your duty is to comply with these requirements as applicable to you ad in particular to ensure that you participate in all required training on this subject, to verify the identity of customers and persons connected to accounts and source funds (if it your role to do so) and to report all knowledge or suspicions of money laundering or terrorism financing immediately.

17. Speak Up / Whistle Blowing

Alubaf Bank aims to encourage a culture of openness and accountability and it is the duty of all Alubaf Bank staff to report if they think that you or anyone else at Alubaf Bank may have been violated any applicable law, regulation of the Code of Ethics and Conduct of Ethics and Conduct, or if you are aware of any frauds (either attempted or realized) or if you have any well-founded concerns about the integrity of individual colleagues, or if you detect a deficiency in Alubaf Bank processes or controls that would allow misconduct to happen or to go undetected, such misconduct may relate to financial malpractice, failure to comply with a legal obligation, a criminal offence, behavior detrimental to the image or reputation of the Bank, the endangering of health and safety or the environment, or the deliberate concealment of any such matters (“misconduct”).

You have a duty to Alubaf Bank and to your other colleagues to speak up, and to report that situation immediately so that the matter be investigated promptly and as fully as possible. You are encouraged to do so even when it is just concern, rather than wait for proof or investigate the matter yourself.

Your manager must then report this notification to the Chief Auditor as soon as practicable but not later than the close of business day after the notification. If you are uncomfortable in discussing the issue with your manager, or if the issue relates to the manager, you should contact the Chief Auditor directly. If the situation related to the Chief Auditor, all such communication shall be treated confidentially to the extent possible and in keeping with Alubaf Bank’s responsibility to address the issue raised.

Alubaf Bank will ensure that you will not suffer any discrimination or victimization and that you will be protected from retaliation.

18. Compliance Procedures

Employees must all work to ensure prompt and consistent action against violations of this Code of Ethics and Conduct. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important to have a way to approach a new question or problem. These are the steps to keep in mind:

- (a) Make sure to have all the facts. In order to reach the right solutions, we must be fully informed as possible.
- (b) Ask yourself: what specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- C. Discuss the problem with your supervisor. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor’s responsibility to help solve problems. If you are uncomfortable discussing the problem with your human resources/compliance as appropriate.
- (d) You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. The Bank does not permit retaliation of any kind against employees or officers for good faith reports of suspected violations.
- (e) Always ask first, act later. If you are unsure of what to do in any situation, seek guidance before you act.

(f) All employees, officer, directors are subject to the Banks Code of Ethics and Conduct. Which describes procedures for the internal reporting of violations of the Code of Ethics and Conduct. All employees, officer, directors must comply with these reporting requirements. Failure to adhere to this Code of Ethics and Conduct by any employee or officer or director will result in disciplinary action, up to and including termination.

19. Staff Authority

Personnel should exercise the authority empowered for their respective positions appropriately and proactively, and assume the responsibility for the result of exercising or failing to exercise their authority.

Personnel may not sign any document or otherwise represent or exercise authority on behalf of the Bank, unless they are specifically authorized to do so. Personnel should clearly understand the limits of their respective authority and due care should be taken not to take any action that exceeds those limit. If there are doubts to the extent of authority, clarity should be sought with the respective Department Head.

Personnel should not accept any power of authority to transact on behalf of clients unless disclosed and approved by their respective Department Head and the Bank Head of Compliance.

Personnel should not utilize their personal salary accounts for or on behalf of any customer/ client related transactions; the personal accounts are only for salary related transactions and for their personal financial transactions. Any Bank authorized transaction or transaction carried out for or on behalf of clients/ customers shall be necessarily carried out in designed customer and Bank accounts only. All personnel should understand their obligations and ensure their compliance with this procedure and report any violation to the Human Resource Department.

20. Complaints and Breaches

Every complaint received by the Bank should be viewed as an opportunity for improvement. For this reason, and to ensure we identify possible breaches of regulation, it is very important that Personnel report all complaints in an accurate and timely manner and that the complaints are resolved as quickly as possible.

The Complaints Procedure Manual on the Banks intranet provides guidance as to the actions required to be taken when a complaint is received. This guidance should be adhered by every member of our staff who receives a complaint, whether by telephone, in writing or by other means.

Personnel should not attempt to connive by failing to report or act upon any complaints received. Such actions will result in serious disciplinary actions.

Breaches of regulatory requirements are a serious matter and must be managed appropriately with the regulatory authorities.

Your Personal Commitment to
Alubaf Arab International Bank
Code of Ethics and Conduct of Ethics and Conduct

I acknowledge that I received a copy of the Code of Ethics and Conduct of Ethical and Conduct dated_____ (“the Code of Ethics and Conduct”), that I have read the Code of Ethics and Conduct and that I understand it and shall comply with it as appropriate. I understand to comply with the Code of Ethics and Conduct. If I learn that there has been a violation of the Code of Ethics and Conduct, I will contact my supervisor or head of human resources. I acknowledge that the Code of Ethics and Conduct is not a contract, and that nothing in the Code of Ethics and Conduct is intended to change the traditional relationship of employment-at-will.

Dated: _____

Signature: _____

Employees Name: _____

Appendix 1

GIFTS / ENTERTAINMENT FORM

Date: _____

Employee Name: _____

Staff ID No: _____

Department: _____ Date received or Given	Name of Provider	Brief Description of Gift or Entertainment	Estimated Value (US\$ or Local Currency)

I, _____, have been offered the above gift by _____ and wish to accept/ reject the same.

I wish to confirm that by virtue of me accepting, the same shall not influence / induce in discharging my official duties or generate favorable future treatment to provider of the gift or benefit.

Employee Signature: _____

Date: _____

Approvals: Head of Department	Human Resources Department (For items more than US\$125/- or equivalent)
--------------------------------------	---

<input type="checkbox"/> Approved <input type="checkbox"/> Decline	<input type="checkbox"/> Approved Decline <input type="checkbox"/>
Name: _____	Name: _____
Signature: _____	Signature: _____