

# GS Mahanagar Co-operative Bank Ltd

## Code of Conduct and Ethics Policy

Approved in Board Meeting

Held on 23-08-2024

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### **Code of Conduct & Ethics Policy**

#### **1. Preamble**

- 1.1 GS Mahanagar Cooperative Bank Ltd is dedicated to operating with the highest ethical standards. Our commitment is to earn and uphold the full confidence and trust of all our stakeholders, including customers, shareholders, employees, vendors, the public, and others with whom we engage.
- 1.2 Employees of the Bank are expected to handle their personal affairs and business transactions in a way that avoids negative comments or criticism from stakeholders and does not harm the Bank's reputation as a responsible

financial institution. GS Mahanagar Co-operative Bank Ltd. is committed to becoming the 'Trusted Banker' by delivering exceptional, proactive, innovative, and cutting-edge banking services, while demonstrating genuine care and concern for our customers and patrons.

- 1.3 The policy titled 'GS Mahanagar Co-operative Bank Ltd Code of Conduct & Ethics Policy' (hereafter referred to as the Code) addresses both business and social relationships that may present legal and ethical concerns. It establishes a comprehensive Code of Conduct to guide all staff members, outlining acceptable behavior and setting clear expectations. By clearly defining the Bank's ethical standards, the Code helps employees recognize and address potential misconduct. When employees understand these standards, they are less likely to engage in unethical behavior, as they know such actions are widely recognized as wrong. A strong ethics code helps focus employees on making the right choices for the right reasons.

## **2. Principles under lying the Code**

- 2.1 The purpose of this Code is to instill **ethical behavior as a habitual practice** among employees, encouraging them to consistently evaluate their actions against established standards. Over time, this practice becomes ingrained in both the individual and the organizational culture.
- 2.2 The Code aims to **establish and uphold proper conduct and behavior**, promoting adherence and discouraging a culture of misconduct often linked to intentional violations of laws, regulations, and governance policies. It reflects the Bank's dedication to integrity and the highest standards of ethical practice.
- 2.3 The Code serves as **a guide for employees in their daily work**, helping them make sound decisions while carrying out their roles and responsibilities across various functions within the Bank. It underscores our fundamental commitment to adhering to regulatory guidelines, laws, and the essential principles of ethical behavior.
- 2.4 This Code outlines the **guiding principles** for how the Bank will operate and conduct its daily business with various stakeholders, including government and regulatory agencies, the media, and other relevant parties. It acknowledges the Bank's role as a trustee of public funds and emphasizes the need to uphold and strengthen public trust and confidence to fulfill its fiduciary responsibilities effectively.

## **3. Applicability of the Code**

- 3.1 The Code applies to all employees, members of Board of Management and Directors of the Bank. It also extends to vendors, consultants and third parties engaged by the Bank, who must agree to comply with the Code as part of their business relationship with the Bank. The Code will be effective from the date it is approved by the Board of Directors of GS Mahanagar Cooperative Bank Ltd.
- 3.2 In the event of any conflict between this Code and applicable laws, the laws will take precedence. If any provision of this Code is found to be invalid, the remaining provisions will remain valid and enforceable. The Bank retains the sole discretion to interpret the Code. Additionally, the guidelines, policies,

and rules outlined in this Code may be amended or modified periodically as needed in the normal course of business.

- 3.3 The rules of conduct outlined in this Code are not exhaustive. They complement the Bank's corporate guidelines, policies, permanent instructions, procedures, and other standards that govern our behavior and with which we must always comply.
- 3.4 The Code does not replace other provisions and obligations otherwise applicable under the law.
- 3.5 The rules outlined in this Code apply uniformly to everyone and are to be followed at all times and in any location while performing duties on behalf of the Bank, whether those duties are professional or social.

#### **4. Administration of the Code & Bank's Responsibility**

- 4.1 It is the responsibility of each Director/ Members of Board of Management and Staff Member to be familiar with the Code. The supervising staff are expected to make every reasonable effort to ensure that their subordinate staffs continue to comply with the provisions of the Code.
- 4.2 Senior management is responsible for implementing the Code and for making decisions on its interpretation. Adherence to the Code will be monitored through audits, examinations, and human resource procedures.
- 4.3 Staff members are encouraged to seek the advice of the appropriate supervisor regarding questions of interpretation, and of the applicability of the provisions of the Code to a particular situation.
- 4.4 Any violation or suspected violation of this Code may warrant appropriate action.
- 4.5 It is the responsibility of the Bank to ensure that all employees are made aware of the Code. Any updates or changes to the Code will be communicated to all employees promptly.

#### **5. Observance of the Code**

All employees, members of BoM and Directors must affirm that they have read, understood, and agree to abide by the Code by signing enclosed Declaration (Annexure I). However this policy is applicable to all from the date it is approved by Board irrespective of whether the said declaration (Annexure-I) is signed or not by anyone.

#### **6. Waivers of the Code**

If under certain exceptional circumstances, it becomes appropriate to grant a waiver of a provision of the Code, it must be made in writing and receive the prior consent of the Board of Directors of the Bank.

#### **7. Interpretation of the Code**

In case of any question or clarification, the General Manager (Administration) will be the competent authority to clarify/interpret the same.

#### **8. Purpose of the Code**

- 8.1 To ensure a consistent understanding of and approach to ethical behavior, including managing actual or apparent conflicts of interest between personal and professional relationships;
- 8.2 To raise awareness of acceptable and unacceptable behavior, aiming to prevent any real or perceived misconduct;
- 8.3 To encourage the prompt internal reporting of both actual and suspected violations;
- 8.4 To uphold our organization's credibility by embedding the highest standards of conduct and ethics into our organizational culture.

- 8.5 To establish robust internal processes and governance, reinforcing proper conduct and behavior among employees to prevent a culture of misconduct that often arises from willful disregard of laws, regulations, and governance policies.
- 8.6 To maintain a strong and rigorous internal vigilance mechanism that assures external agencies that our Bank meets the required standards to protect the public interest.
- 8.7 To reinforce an independent internal mechanism within the Bank to resolve customer complaints involving issues related to business ethics.
- 8.8 To cultivate and sustain a strong ethical culture where employees feel comfortable speaking up and voicing their concerns, and trust that their colleagues will do the same.
- 8.9 To have a leadership which will set a tone that inspires trust in their own ethics and in their willingness to hear and respond to concerns.
- 8.10 To eliminate fear of retaliation, which deters reporting misconduct and hinders the development of a strong ethical culture.
- 8.11 To foster a broader approach which goes beyond the rules, whereby all kinds of misconduct risks can be proactively searched.
- 8.12 To clearly define acceptable and unacceptable behaviors, particularly concerning financial misreporting, misconduct, economic and financial crimes (such as fraud and money laundering), anti-trust violations, bribery, corruption, market manipulation, mis-selling, and breaches of consumer protection laws;
- 8.13 To emphasize that, beyond complying with legal, regulatory, and internal policy requirements, everyone in the organization is expected to act with honesty and integrity, and to perform their duties with skill, care, and diligence;
- 8.14 To ensure that all are aware of the potential internal and external disciplinary actions, legal actions and sanctions that may follow unacceptable behaviours.
- 8.15 To define practices, internal controls, and compliance mechanisms that help minimize opportunities for misconduct.

## **9. CONFLICTS OF INTEREST**

- 9.1 Conflict of interest implies a situation of conflict between the duty of a person and private/personal interest so far as an individual, which could improperly influence the performance of his/her duties and responsibilities. Conduct & ethics are liable to get challenged when there are instances of conflicts of interests.
- 9.2 Examples of situations which may arise due to conflicts of interest:
  - 9.2.1 Where bank enters into a business relationship with an entity in which one of the Bank's Board/ Board of Management members or an employee has a financial interest either directly or indirectly;
  - 9.2.2 **Insider Information:** If bank employees or members of Board/Board of Management use non-public information for personal gain.

## **10. Purpose of Conflict to Interest Recognition and its Management Policy**

- 10.1 To create awareness of such situations and to ensure that in all circumstances the interest of the Bank should be central in the decisions taken.

- 10.2 To confirm that reporting lines and the allocation of responsibilities within the bank is clear, well-defined, coherent, enforceable and duly documented.
- 10.3 To ensure that there is a clear, transparent and documented decision making process and a clear allocation of responsibilities and authority within the internal control framework,
- 10.4 To safeguard an adequate, effective and independent internal control framework that includes a clear organisational structure and a well-functioning risk management, compliance and internal audit functions that have sufficient authority, stature and resources to perform their functions;
- 10.5 To identify the relationships, services, activities or transactions of the Bank in which conflicts of interest may arise and state how these conflicts should be managed.
- 10.6 To cover relationships between a Bank and its shareholders, the members of its Board; its staff; material suppliers or business partners; other related parties; and legal or natural persons closely linked to person under points 10.1 to 10.5 above.

## **11. Responsibilities under the Code of Conduct & Conflict of Interest Recognition and Management Policy**

### **11.1 General adherence to applicable laws and regulations**

- 11.1.1 We are required to be well-informed about and adhere to all relevant laws, regulations, rules, and regulatory orders that apply to our activities. Should any inadvertent non-compliance occur, it must be promptly reported to the appropriate higher/regulatory authorities.
- 11.1.2 We must not engage, either directly or indirectly, in any activities that are illegal or could be perceived as illegal, regardless of whether these activities are related to our professional duties or occur outside of them.
- 11.1.3 Any suspicious activity observed must be reported to the competent authority promptly.
- 11.1.4 When perform in our duties, we must immediately disclose to the competent authority if we are the subject to fan inquiry, proceedings, law suits or convictions, regardless of its type, and that could be connected to our function.

### **11.2 Effective & desirable communication**

- 11.2.1 To promote employee communication and teamwork by maintaining genuine and human relationships based on integrity and trust. Official communication must be constructive, professional, and courteous and open while ensuring the confidentiality of information.
- 11.2.2 To ensure that all communications sent via electronic networks are not defamatory, offensive, harassing or threatening and do not contain any illicit messages and duly follow rules of respect and civility.
- 11.2.3 To ensure not using electronic networks that allow for participating in illicit, obscene or offensive material and/ or violating copyright regulations. It is the discretion of the Bank to monitor activities on our equipment and electronic exchanges and Bank may question or be subject to an investigation to ensure that our activities correspond to the established and communicated security guidelines of the Bank.

### **11.3 Dealings with the customers**

In all our dealings with the customers, we must be thoroughly professional in our approach. As bankers, we must function with trust, authenticity, transparency and integrity and, thus, give them complete, quality information and advise them properly, keeping in mind their needs and financial situation. We must inform them about the products and services that are best suited to their needs, regardless of Bank's targets. We must also ensure that we use the information of our customers in a responsible and cautious manner.

11.4 Disclosures to make full, fair, accurate, sensible, timely and meaningful disclosures in the periodic reports required to be filed by the Bank with statutory and regulatory authorities.

### **11.5 Healthy and safe work environment**

11.5.1 To be committed to providing a healthy and safe work environment and complying with all applicable legislations. We are responsible for making decisions that will prevent risks and ensure our own health and safety as well as that of others in accordance with the workplace health and safety guidelines. While carrying out our duties, whether on Bank premises or else where, we must not take or be under the influence of any kind of drugs or alcohol. Employees are urged to continue compliance with the Non-Smoking policy in offices and also in other public places as required under the law.

11.5.2 We must uphold and maintain the dignity of our co-workers and make all efforts to maintain a productive work environment that is free from any kind of harassment including sexual harassment that may create an atmosphere of hostility and intimidation. Employees shall abide by the extant guidelines of the Bank in this regard.

11.5.3 To be committed to fostering an equal opportunity and **inclusive workplace** by embracing diversity and be free from all forms of discrimination, harassment and violence. All our actions and behavior must reflect respect for each other.

### **11.6 Conflict of Interest**

11.6.1 Conflict of interest arises when there is an unfair advantage, be it real, potential or perceived. This means that we cannot reveal or use information acquired in the performance of our duties to obtain an advantage for ourselves or someone else. This obligation continues to apply even after our employment has been terminated.

11.6.2 Hiring, managing or working with a family member could pose a potential conflict of interest.

11.6.3 To ensure to avoid situations where there is a perceived or actual conflict of interest, following behaviors must be avoided:

11.6.3.1 We must not falsify documents and skip any steps required by a policy or procedure to achieve or surpass sales or profitability objective.

11.6.3.2 We must not purchase the Bank's 'repossessed' properties.

11.6.3.3 We must not accept appointment in any kind of employment / engagement without obtaining prior authorization from the competent authority.

- 11.6.3.4 We must not engage in any commercial activity with a customer or third party unless we have the prior authorization of the competent authority.
- 11.6.3.5 We have certain privileges as Bank employees. However, we cannot have someone else benefit directly or indirectly from the advantages and privileges awarded to us as Bank employees, other than those authorized by the banking advantages for employees and retirees.
- 11.6.3.6 We must carry out our personal transactions and those of our family members as if they or we were regular customers. An employee must not authorize financial transactions or any master data in computer system of our own staff or of any one close family members.
- 11.6.3.7 We must not grant loans to ourselves or members of our family or a company in which we or a member of our families have a stake.
- 11.6.3.8 We must not accept any gift, service or perk which might influence our work or decisions. We must not solicit nor encourage giving of gifts or entertainment by an existing or potential customer, consultant or any third party.
- 11.6.3.9 Our loyalty to the Bank governs our behavior and we must ensure that the assets and property safe guarded or under the control of the organization are preserved.
- 11.6.3.10 We must not work for our own business or for that of a third party during business hours. We must also minimize activities unrelated to our work such as checking social networks like Facebook or Instagram.
- 11.6.3.11 We must abstain from making comments that could tarnish the Bank's image or reputation with customers, employees or the general public. We must avoid mentioning the organization when we express personal opinions. This obligation continues to apply after our employment has ended. Both at work and in our personal activities, we must avoid participating, directly or indirectly, in activities that could compromise the organization's interests, image or reputation.
- 11.6.3.12 We must use the organization's name, trademark and any other form of its intellectual property exclusively for business purposes in accordance with the applicable standards in this regard. If, as part of our duties, or while using the organization's equipment, we develop processes, programs or any other intellectual property, the Bank will be the owner of such property from the onset.
- 11.6.3.13 We must extend fullest cooperation in investigations, requests for information and audits, regardless of whether they are internal or external.
- 11.6.3.14 Communications with the media must be made only by persons authorized to represent the Bank in dealings with the media in accordance with guidelines in force in the organization.
- 11.6.3.15 We must safeguard organization's assets against any type of inappropriate use. These assets include as hand marketable

securities, offices, supplies and equipment, systems and technological resources. We must not use the equipment or resources of the organization, including the services of its employees, other than for the needs of our duties, except insofar as this use is reasonable and in accordance with the organization's corporate guidelines and policies. In such a case, we must obtain proper authorization in advance

- 11.6.3.16 Any expenses that we may incur for and on behalf of the Bank must be reasonable, relevant and in compliance to applicable policies of the Bank. The manner in which customers are entertained must comply with the fundamental principles of the Code and be mindful of maintaining our image and reputation.
- 11.6.3.17 The Bank must not be associated with any school of thought or political party line. However, we may, on a personal level, participate or contribute to political activities. We must not carry out political activities on work premises or use the time and resources of the organization for such activities. No donation to political parties or candidates may be made with or reimbursed from Bank funds.
- 11.6.3.18 Any close or romantic involvement with another employee of the Bank, supplier, third party might affect an employee's ability to exercise good judgment on behalf of the Bank, leading to conflict of interest. Such a situation must be reported to the competent authority to enable adoption of corrective measures.

## **12. Honest and ethical conduct**

To adhere to the highest standards of honest and ethical conduct, including proper and ethical procedures in dealing with actual or apparent conflicts of interest between personal and professional relationships.

## **13. Confidentiality and non-disclosure of Information & Fair Dealing**

- 13.1 We must maintain the highest level of confidentiality and fair dealing within and outside the Bank.
- 13.2 We must diligently and consistently respect the confidentiality of information acquired in the course of employment. Employees must take all reasonable measures to protect the confidentiality of non-public information about the Bank and its customers and other third parties obtained or created in the course of employment and to prevent the unauthorized disclosure or misuse of such information.
- 13.3 We must ensure that confidential information acquired in the course of employment is only used in the proper performance of their duties and not used for personal advantage or disseminated to the public and other third parties either during or after employment without Bank's approval.
- 13.4 No one must post any confidential or strategic information on social networks.
- 13.5 Employees may access Bank's systems and confidential information only if truly needed to perform official duties. Employees must act within the ambit of security and confidentiality guidelines of the Bank while carrying out their duties.
- 13.6 Any event which may pose threat to Bank's security and jeopardize the



- protection of confidentiality must be reported to the competent authority without any delay.
- 13.7 We must safeguard the confidentiality of information about our customers and employees.
  - 13.8 We must be vigilant about cyber security risks and information theft and report any that could jeopardize the confidentiality of information.
  - 13.9 We must consistently adopt secure and responsible practices and be familiar and comply with all information security guidelines.
  - 13.10 All employees must remain vigilant about phishing attempts, fraudulent calls or suspicious behavior and report without delay any suspicious behavior by email, phone, and text or in person.
  - 13.11 We must safeguard our portable equipment's (laptop and smartphone) against loss or theft at anytime and anywhere. It is essential to report immediately any loss or theft of equipment.
  - 13.12 We must be cautious while transmitting confidential information only to individuals who need it as part of their official duties. Not to use information about customers and employees for personal gain or maliciously. Not to share our passwords or user codes and protect them adequately.
  - 13.13 All employees must follow secure destruction procedures once information we possess are no longer required.
  - 13.14 We must safely store any document containing confidential information under lock and key.
  - 13.15 Since all information circulated on the organization's electronic networks belongs to the organization, we must ensure the following:
    - 13.15.1 During work hours, the electronic networks are used to carry out our duties.
    - 13.15.2 The confidential information transmitted via electronic networks complies with the security guidelines in effect. If emails are sent outside our networks, the contents of the emails must be secured.
    - 13.15.3 Only our official email address is to be used to handle, send or receive confidential or professional information. No information belonging to the Bank, customers or employees should be stored on external sites (e.g., Dropbox, Amazon Drive, Google Drive)that are not authorized by the Bank.
  - 13.16 We must deal fairly without any discrimination and with honor with Bank's customers, competitors, co-employees, suppliers and other business associates as well as public authorities.
  - 13.17 No employee should take unfair advantage of any one through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice such as bribe or other illegal gratification, which may cause disrepute or disgrace to the institution.

#### **14. Acceptance or giving of Gifts/ Benefits**

- 14.1 Employee must not accept money, inappropriate or excessive gifts, loans, excessive hospitality, or other special treatment or items of value(Cash payments, gifts, entertainment, excessive business promotional activities, covering or reimbursing expenses, investment opportunities, shares, securities, loans or contractual

rights, promise of future employment, payments under consulting agreements, subcontracts, stock options, and similar items of value) from any supplier, customer or any interested party which could impair an employee's judgment or be perceived to be a conflict of interest, bribe or inappropriate gift. A gift or hospitality is inappropriate or excessive if, under the circumstances, it has a value or is of such a personal nature that it is out of proportion to Bank's business needs;

- 14.2 All employees must not accept any bribe. A bribe is anything of value that may be seen as an attempt to influence an action or a decision in order to obtain or retain business or acquire an improper advantage. This could include money, gifts, favors, use of Bank's resources, entertainment or other items of value.
- 14.3 An occasional gift which is infrequent and is of limited value and is unlikely to lead some one to feel obligated or influenced by them may be accepted, although employees are encouraged to share the gift baskets with other employees in their department.

### **15. Corruption and Anti- Money Laundering**

- 15.1 As employees, we must have zero tolerance for corruption. We must act with the utmost caution in this regard, especially being the custodian of public money. We must never solicit, accept or offer any bribes or other benefits of a similar nature in the performance of our duties. Our behavior must not lead others to believe that we would accept such advantages.
- 15.2 We must take all necessary measures to reduce the risk that the Bank's products and services are used for money laundering and terrorist financing purposes. In our day-to-day activities, we must apply the principles set out in the Anti- Money Laundering Policy and the standard and procedures that stem from it. We must also immediately identify and report any unusual transaction or attempted unusual transactions.
- 15.3 To be careful not to be involved in any kind of fraudulent or illicit transactions, directly or indirectly, such as theft, manipulation of accounting files, misappropriation of funds, appropriation of the Bank's funds, falsification of accounts, documents and files, and fraudulent use of the Bank's registers and resources. It is also our duty to report any suspicious activity immediately.

### **16. Product Appropriateness & Suitability**

We must know and understand Bank's customers' need and financial situation and accordingly inform the customer about Bank's products and services that are best suited to their needs, regardless of Bank's targets. Employees must ensure that product recommendation is well suited to the needs and means of the customer in view of the customer's objectives, degree of financial knowledge and sophistication, the level of acceptable risk and other factors made known to the Bank. They should not mis-sell products, conceal or willfully withhold details, product features and risks pertaining to products being offered by the Bank.

### **17. Assets and Resource Usage**

All employees shall protect and ensure efficient use of Bank's assets including but not limited to the result of an employee's work, money and

funds, Information about corporate or customer transactions, Intellectual Property, proprietary information, equipment, computer systems and software, furnishings etc.

### **18. Intellectual Property**

All assets / propriety developed by the employee during the course of employment with the Bank shall belong exclusively to the Bank and ownership of copyrights of such assets lies with the Bank. We must use Bank's name, trademark and any other form of its intellectual property exclusively for business purposes in accordance with the applicable rules in this regard.

### **19. Reporting Violations via Whistle Blower Policy**

19.1 The Bank encourages an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's superior is in the best position to address an area of concern.

19.2 Anyviolationorsuspectedviolationsofeventsthatcouldleadtoanysuchviolationperceived violation of the Code may be reported under Bank's Whistleblower

Policywithoutfearorreprisalorbeingthreatenedbydoingso.Anyonefilingacomplaintmustbe acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

19.3 All concerns raised by the employee must be treated promptly, fairly and discreetly without being disadvantaged or victimized for raising good faith concerns

19.4 Violationorsuspectedviolationsmaybesubmittedonaconfidentialbasisor maybesubmittedanonymously.

### **20. Employee Conduct**

20.1 Employees should ensure accuracy of Bank's operations and financial records that they are aware of within the frame work of their duties. These include not only financial accounts, but other records such as quality reports, time records, expense reports and submissions such as benefit claim forms. Employees must report their claims/expenses such as conveyance, transportation, halting, reimbursement claims, Bank's car etc. accurately and in a timely manner.

20.2 Employees should maintain good conduct, discipline, punctuality and show courtesy and attention to all persons – colleagues, customers, business associates & vendors, regulators, and any other external stakeholders, in their transactions or dealings with the Bank.

20.3 Employees should ensure that they are appropriately dressed and properly groomedat all times.

20.4 Employees shall adhere to the Bank's work timings and leave management guidelines at all times.

20.5 Employees should ensure that they use their staff accounts for bona fide transactions.

20.6 Employees must desist from discriminating against, harass or bully any other employees.

20.7The behavior of employees must reflect sincerity and willingness to learn from their mistake sand ability to view failures as feedback that provides them with the information they need to learn ,grow and

succeed.

20.8 Each employee must accept responsibility for their actions.

20.9 Employees must ensure that they are not involved in parallel banking activities like lending money to others for interest.

**21. Public Representation**

Employees, Directors, Members of Board of Management should refrain from any direct interaction with the media, press and financial community, unless otherwise authorized to do so.

**22. Environment al considerations**

Employees are expected to incorporate environmental, health and safety considerations into their daily activities.

**23. Audit & Investigation**

Employees must cooperate with any internal or external investigation or audit, or any regulatory xamination. If at any time, the employee is involved in any legal/administrative/quasijudicial proceeding(s),they should immediately inform the competent authority, with relevant supporting documents and a brief summary of the proceedings.

**24. Handling of Market News/Information**

24.1 Employees should not encourage or circulate rumours or unverified information obtained from client, Industry, any trade or any other sources without verification.

24.2 Employee should be arinmind that any market related news received by theme it her in their official mail/personal mail/blog or in any other manner, should be forwarded only after the same has been seen and approved by the Competent Authority. If an employee fails to do so, he/she shall be deemed to have violated the Rules/Regulations and shall be liable for action.

**25. Any violation of this Code is liable to attract disciplinary action**

An employee who violates this Code will become liable for prompt corrective action including appropriate disciplinary action depending on the nature, severity, and frequency of the violation.

**26. Review of the Policy:**

The Bank reserves the right to review ,modify and amend the policy when ever deemed necessary.

**DECLARATION**

I, here by, declare that I have read & understood the Code of Conduct and Ethics Policy and understand my obligations as an employee to, hereby, comply with the said Code, as applicable at all times.

I confirm, and undertake to abide by the same in letter and spirit.

I am also aware that failure to abide by the above Code of Conduct & Ethics may lead to disciplinary action as per Bank's extant Regulations /Rules.