

# HBL



# CODE OF ETHICS AND BUSINESS CONDUCT

Making your journey smoother



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**Dear Colleagues,**

HBL places great value on all of its assets. Among those assets none has greater value or is of more importance to the Bank than its reputation.

As representatives of the Bank every employee of the Bank has a significant role to play in preserving and nurturing the Bank's reputation for honesty, integrity, and fair play in dealing with fellow employees, customers, regulators, suppliers and general public. The Bank expects all employees to conduct themselves in accordance with the highest standards of personal and professional integrity and to comply with all laws, regulations and corporate policies and procedures.

As the leading financial institution of Pakistan, HBL believes in "Doing the Right Thing" with integrity at its core. We can never compromise on our Integrity! HBL's sees it culture as a competitive advantage which drives passion and commitment of the employees. Everyone at HBL has ownership and responsibility for doing the right thing, because it is the right thing to do. We must all safeguard the reputation of the Bank at all times. HBL Staff must live the values which represents the core identity of the Bank and make it part of Culture of the Bank. As leaders have additional responsibilities to pay attention to, more is expected from them as our culture based on the quality of their leadership.

This code aims to clarify for all staff of the Bank the conduct expected in the performance of our duties, thereby maintaining public trust and confidence in the integrity and professionalism of the services provided by the Bank.

This code of ethics & business conduct is written as a set of general principles rather than detailed prescriptions. It is impossible to address every single circumstance you may face that will require you to ponder the proper ethical approach in any given situation. The successful development of an ethical environment relies upon the sense of responsibility for our own professional behavior taking into consideration the provisions of this code and policies of the Bank.

If there is any doubt as to the applicability of the code, or the appropriate course of action to be adopted, the matter should be discussed with your Functional Head or a Senior Human Resources Representative.

HBL is at the forefront of all development initiatives which includes growth of priority sectors and targeting the unbanked population in the country. As the leading financial institution of Pakistan, HBL remains committed to its objective of financial inclusion for all segments of society and delivering exceptional customer service.

#### **President & CEO**

## 1. OBJECTIVES

This Code of Ethics and Business Conduct (the “Code”) is binding on all employees of HBL as it intends to deter wrongdoing and act as a ready reference to all our employees in maintaining compliance with the rules and regulations laid down by HBL and would be a guide in directing the Group’s management to ensure the observance by employees of this Code according to the law along with applicable Regulations, Policies and the Values of HBL to promote the following objectives: -

- Honest and ethical conduct, including ethical handling of actual or apparent conflicts of interests between personal and professional relationships
- Upholding and living the HBL Values of Integrity, Customer Centric, Value People, Progressive and Excellence
- Promote ownership of the Code across the Bank at all levels
- Compliance with applicable governmental laws, rules and regulations
- Promote internal reporting to designated persons of violations of the Code; and
- Accountability for non-adherence to the Code

## 2. INTRODUCTION

It is the policy of HBL to conduct business of the bank in full compliance with applicable laws, rules and regulations and to adhere to the highest ethical standards. To these ends, the employees of the bank are expected and directed to manage the business of the bank with:

- The highest ethical standards of integrity and candor in conformity with the Code of Ethics & Business Conduct;
- Due diligence and proficiency in all business activities;
- Compliance of all legal and regulatory requirements; and
- A manner that causes no reputational risk for the Bank, both on and off the job.

This Code lays down the principles and sets the tone for proper conduct and ethical behavior in line with HBL Values for conducting business at HBL and the law. Business units are encouraged to maintain more detailed codes to meet the special requirements of their individual businesses; but such documents must be consistent with this Code.

Whilst, the Board, the Chairman and the President of HBL have ultimate responsibility for ensuring the legality and integrity of the Bank's operations, day-to-day responsibility lies with management, but, whatever your position in the Bank, you are personally responsible for ensuring that you act fully in accordance with the HBL Policies, Rules & Regulation, Procedures and HBL Values.

### 3. OBSERVANCE OF RULES

We expect in our people, integrity, honesty and the highest moral principles; and accordingly staff must adhere to such principles, including (without limitation) HBL's Staff Service Rules, bank's social media guidelines, etc. . the Bank does not intend to attempt any control over the private lives of its people or to say how these lives are to be lived but employees must ensure that HBL's reputation is never compromised..

Character reflects what a person is; reputation denotes what a community considers a person to be. The Bank will not tolerate any conduct, which might be considered as detrimental to the reputation of the Bank. We must rely on a sense of propriety and good judgment in upholding standards, which are always above reproach.

Every employee shall conform to and abide by the law, as well as rules and regulations of the bank and shall strictly observe, comply with and obey all instructions/ directives issued by the management, regulatory bodies and the law from time to time.

### 4. APPLICATION OF THE CODE

This Code applies to all staff members of HBL in their decisions and activities within the scope of employment, or when representing the Bank in any capacity. A copy of the Code will be given to every employee for review. Each one of them will be required to sign a written confirmation that they have reviewed, understood and agreed to adhere to the Code. They will be notified of any revision in the Code, if any, through internal circular(s).

### 5. ACKNOWLEDGEMENT OF THE CODE

You must read and understand HBL's Code of Ethics & Business Conduct and commit to abide with the Code by executing an acceptance undertaking of the Code. You would be required to provide the acknowledgement annually in accordance with SBP requirements laid down in the CRM guidelines 2017 as amended from time to time.

## 6. OBTAINING GUIDANCE

Copy of the Code is available on 'Iamhbl' and may also be obtained from Human Resources through [hr.helpline@hbl.com](mailto:hr.helpline@hbl.com) .

For additional information or explanation regarding a particular provision of the code, or if you need guidance in a particular situation, please contact your immediate manager / supervisor. If you are uncomfortable speaking to your supervisor , or require additional guidance after consulting with your supervisor, you are encouraged to contact us at the following e-mail address:

[speakup.hr@hbl.com](mailto:speakup.hr@hbl.com)

### Or contact:

Human Resources, 19th Floor, HBL Plaza, I.I. Chundrigar Road, Karachi, Pakistan, for Helpline call at # +9221-32600362, +9221-32418000 Ext: 8990 & 8991, For Speakup refer Ethics & Conduct, 20<sup>th</sup> Floor, HBL Plaza, I.I.Chundrigar Road Karachi, Pakistan or call +9221-32418000 Ext. 19095, 19160.

## 7. REPORTING VIOLATIONS OF THE CODE

The success of the Bank is reflected in our decisions and actions. It is the duty and responsibility of each employee to understand and adhere to the principles provided in the Code so that potential issues may be effectively and efficiently resolved, and the Bank's valuable reputation is preserved.

Any known or suspected violation of the Code must immediately be reported. Violations of the Code may result in disciplinary action including, in severe situations, immediate termination of employment. If you know of or suspect a violation of the Code (including actions or failures to act upon), report the matter immediately to your manager, or to the help-line / person mentioned in section **Obtaining Guidance** or report it at [whistle.blow@hbl.com](mailto:whistle.blow@hbl.com) . Concerns or complaints, arising in the ordinary course of business, which cannot be resolved with your supervisor, should be directed to the respective Functional Head(s) / contacts mentioned in section **Obtaining Guidance**.



## 8. ELEMENTS OF THE CODE

## 9. HBL VALUES

HBL Values	INTEGRITY	CUSTOMER CENTRIC	VALUE PEOPLE	PROGRESSIVE	EXCELLENCE
Value Definitions	Be Ethical and Fair	Deliver Great Experiences	Respect, Empower, Appreciate	Innovate and Challenge	Be your best
HBL Commitments to Our Values	<ul style="list-style-type: none"> <li>We honour our commitments and do what is right</li> <li>We are fair, respectful and honest at all times</li> <li>We are ethical in our decisions and interactions</li> <li>We take responsibility for our actions</li> <li>We are prudent and responsible with the assets entrusted to HBL</li> </ul>	<ul style="list-style-type: none"> <li>We value our clients and develop product and services around their needs</li> <li>We provide exceptional service to all we serve</li> <li>We understand and respect our customers</li> <li>We deliver solutions that add value to our customer's lives</li> <li>We consider the impact of our policies and decisions on our customers</li> <li>We are fully transparent with our customers</li> </ul>	<ul style="list-style-type: none"> <li>We treat our people equitably and make decisions on merit</li> <li>We invest in people and provide opportunities for learning and growth</li> <li>We empower people to do what is needed for success</li> <li>We provide a positive and collaborative work environment</li> <li>We celebrate our successes and recognize people for their contributions</li> <li>We encourage and embrace diversity</li> </ul>	<ul style="list-style-type: none"> <li>We challenge our thinking to stay the best</li> <li>We encourage our team members to question the status quo</li> <li>We innovate and adapt to change</li> <li>We positively impact and save the communities in which we live</li> </ul>	<ul style="list-style-type: none"> <li>We lead in our industry</li> <li>We take ownership of what we do</li> <li>We relentlessly pursue quality without compromise</li> <li>We consistently adhere to measurable standards and look for ways to exceed them</li> <li>We benchmark against the best</li> </ul>
Employees Honour the Values and Commitments by Demonstrating the following Behaviours	<ul style="list-style-type: none"> <li>I do what I say, I take full responsibility for my words, actions and attitude</li> <li>I make decisions that are fair, respectful and ethical</li> <li>I communicate openly and honestly</li> <li>I uphold HBL's reputation</li> <li>I effectively use HBL's assets, resources, and time</li> <li>I maintain confidentiality at all times</li> <li>I adhere to the HBL Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>I look for ways to make a difference in the lives of our customers</li> <li>I greet everyone positively</li> <li>I take actions that demonstrate I am committed to doing what is right for the customer</li> <li>I am solution-oriented</li> <li>I listen to the customer and always ask what (more) I can help them with</li> <li>I clearly explain the products, services and fees to the customers</li> </ul>	<ul style="list-style-type: none"> <li>I practice open and timely communication</li> <li>I actively listen to others</li> <li>I trust people the way I expect them to treat me</li> <li>I support and collaborate with my team and colleagues across HBL</li> <li>I am always respectful and honest</li> <li>I am committed to creating the best work environment</li> </ul>	<ul style="list-style-type: none"> <li>I am motivated and enthusiastic to learn, develop and apply my knowledge and skills</li> <li>I question why we do what we do so we can continually improve</li> <li>I share my knowledge and promote best practices within HBL</li> <li>I have the confidence to express my ideas</li> <li>I embrace opportunities for self-development</li> <li>I am eager to adopt new technologies and innovations</li> </ul>	<ul style="list-style-type: none"> <li>Everything I do, I do exceptionally well</li> <li>I demonstrate ownership of my job and have pride in what I do</li> <li>I achieve and aspire to exceed the expectations for quality, standard operating procedures and regulatory requirements</li> <li>I commit to completing my goals, tasks and assignments in an effective and timely manner</li> <li>I look for opportunities to improve myself</li> <li>I collaborate with my team and other departments to exceed the objectives and vision of the organization</li> </ul>
Leaders build on our Values and Commitments by demonstrating these additional Leadership Behaviours	<ul style="list-style-type: none"> <li>I implement policies fairly and consistently in line with HBL's code of conduct, business practices and mission</li> <li>I hold myself and my team to highest standards of ethics and conduct</li> <li>I encourage open discussions and communication with my team members and my supervisor</li> <li>I provide fair and honest feedback to assist in the development and growth of my people</li> <li>I treat team members equitably</li> <li>I anticipate and prepare for ethical conflicts</li> <li>I share with and explain to my team organization decisions</li> </ul>	<ul style="list-style-type: none"> <li>I personally talk to and engage with customers to understand their experience with HBL and my team</li> <li>I train team members to understand what the customer expects and develop their competence to deliver quality results</li> <li>I bring customer needs, expectations and perspectives into daily interactions with team members</li> <li>I empower team members to succeed in serving our customers</li> <li>I measure service standards and consistently find solutions to improve the services and experiences of our customers</li> <li>I provide a positive example of serving others</li> </ul>	<ul style="list-style-type: none"> <li>I develop an environment where people understand decisions are based on merit</li> <li>I acknowledge and appreciate individual and team effort</li> <li>I take responsibility for developing capabilities of my team</li> <li>I give honest and constructive feedback while maintaining dignity</li> <li>I give credit where it is due</li> <li>I have a succession plan and will groom the highest potential team members</li> <li>I hire, nurture and retain high caliber, motivated people to develop a performing team</li> <li>I promote diversity within my team</li> </ul>	<ul style="list-style-type: none"> <li>I mentor and coach team members to develop their skills</li> <li>I ensure team members feel safe to explore and share innovative ideas for how we work, our practices, services and products</li> <li>I break down barriers and encourage ideas sharing throughout HBL</li> <li>I enable acceptance of change within my team</li> <li>I am involved in my community and encourage my team members to do the same</li> </ul>	<ul style="list-style-type: none"> <li>I aspire to be held in high regard for my leadership and industry expertise</li> <li>I collaboratively develop and implement goals and objectives for my team</li> <li>I ensure excellence in delivery of products and services</li> <li>I provide the right tools and resources for my team to do their jobs but also work within our constraints</li> <li>I adopt best practices and seek opportunities for continuous improvement</li> </ul>

## 10. MAINTAINING OFFICE DECORUM

- You are obligated to comply with the designated Office work timings and ensure that work commitments are not disrupted.
- You are required to maintain proper dress code (Office Attire) and appear well groomed & presentable all the time. Livery staff should be in their proper uniforms during office hours.
- You should observe high standards of behavior/attitude that includes positive attitude / body language, politeness & optimistic approach. Clumsy / abnormal behavior / should be avoided at all times.
- You must maintain high standards of respect for all employees, customers, vendors etc.
- You are responsible for ensuring that your own work area / office surroundings follow a clean desk approach.

Strict action will be taken against the person not maintaining office decorum.



## 11. CONFIDENTIALITY

Proprietary and Confidential Information must never be disclosed to a third party except in accordance with bank processes and the law.

**\*Proprietary Information** is information owned by HBL or created by staff within the scope of employment. It may consist of any information, data, intellectual property, analysis, report, system, or process that could give HBL an advantage over competitors.

**\*\*Confidential Information** includes, among other things, personal information, Customer Data, Proprietary Information, or nonpublic information and can be written, oral, telephonic, or electronic. A general rule is to presume that any information you receive about HBL or its customers is confidential information and, therefore, should be protected from disclosure.

All employees must adhere to prohibition /Chinese wall on Confidential Information as per Policy on Prohibition of Insider Trading.

The Banks and its employees owe a strict duty of confidentiality to their customers. You will not disclose to any person / third party particulars of the identity or financial, business or personal affairs of a customer, unless:

- The customer has given prior written consent
- Disclosure is compelled by a court or statutory authority of competent jurisdiction
- Disclosure is in accordance with the law

## 12. CONFLICTS OF INTEREST

You must ensure that your personal interests do not conflict with the duties which you owe to the Bank or which the Bank owes to its customers. In particular, you should never become personally involved in any transaction, negotiation or contract on behalf of HBL with an entity in which you or any of your relative or friend has an interest, without full written disclosure (Annexure- II COI Template) and with prior written approval from the Functional Head concerned Any such transaction should be within the guidelines of Related Party Policy of the Bank.

**Outside Employment/ Business or Commercial Activity/Agent:** You should not accept any employment, consultancy, directorship, or partnership outside the Bank or engage in any commercial activity as a principal or agent on behalf of other persons without the prior written approval of HR, Functional Head and the President.

You must avoid any conflict (or even the perception of a conflict) between your personal, social, financial or political interests and the advancement of HBL's business interests or the interests of its customers. You must not hold an elective political office e.g. MNA/MPA/Counselor, since it will interfere with your duties and responsibilities as an employee.

**Close relatives:** You must ensure disclosure of close relatives to HR at the time of joining HBL and thereafter keep this information updated as and when there is any change. 'Close relative' is defined herein as son, daughter, brother, sister, mother, father, spouse, step relative or in-laws.

You must not participate in reviewing and approving an application for a loan from a corporation of which you are a director.

**Pecuniary obligations:** You must not involve yourself in any borrowing /lending transactions or any pecuniary obligation with other employees, broker or money lender or any persons having dealings with the bank.

**Gifts & Inducements:** You are not permitted to accept gift, entertainment, or other favors from existing or prospective customers of the Bank or suppliers/ service providers except as may be allowed as set forth below:

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

For further details and guidance, you may refer to the [Circular: Disclosure of Gifts and Inducements 020STF 2016 dated 8<sup>th</sup> Feb 2016.](#)

This Code is applicable under following instances:

Whoever;

- (1) gives, offers, or promises anything of value to any person, with intent to influence or reward a staff member, agent, or attorney of a financial institution in connection with any business or transaction of such institution; or
  - (2) As a staff member, agent, or attorney of a financial institution, solicits or demands for the benefit of any person, or accepts or agrees to accept anything of value from any person, intending to be influenced or rewarded in connection with any business or transaction of such institutions, shall be guilty of an offense.
- Exceptions to the general prohibition regarding acceptance of things of value in connection with bank business may include:
    - (1) Acceptance of gifts, gratuities, amenities or favors based on obvious family or personal relationships (such as those between the parents, children or spouse of a Bank staff member) where the

circumstances make it clear that it is those relationships rather than the business of the Bank concerned which are the motivating factors;

- (2) Acceptance of meals, refreshments, entertainment (including tickets to sporting events, arts, concerts, etc.), accommodations or travel arrangements, all of reasonable value, in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided that the expense would be paid for by the Bank as a reasonable business expense if not paid for by another party;
  - (3) Acceptance of advertising or promotional material of reasonable value, such as pens, pencils, note pads, key chains, calendars, diaries and similar items;
  - (4) Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers;
  - (5) Acceptance of gifts of reasonable value that are related to commonly recognized events or occasions, such as a promotion, wedding, retirement or birthday;
  - (6) Acceptance of civic, charitable, educational, or religious organization awards for recognition of service and accomplishment;
  - (7) Items on a case-by-case basis, not identified above, in which a Bank staff member accepts something of value in connection with bank business, provided that such request is solicited and obtained in writing directly from the Gift Committee nominated by the President & C.E.O. on the basis of a full written disclosure of all relevant facts and is consistent with Bank's policies.
- The Committee shall determine reasonable value of gifts/ benefits and ensure that although gifts and entertainment may be offered in the normal course of business; such gifts or entertainment should not be excessive in value or frequency.

Any business related gift/ benefit, which employee or his/her family gives or receives, must be reported in writing within three working days to your immediate supervisor, Human Resources Representative or Gift Committee. An officer receiving such **financial benefit** must report promptly and acknowledge receipt. The underlying principle is that the employee should not derive material gain from the Bank's business.

**To prevent conflicts of interest, you must:**

- Act transparently in everything you do.
- Avoid activities, interests, or relationships that could interfere, or even appear to interfere, with your independence and objectivity.

- Not engage in any dealings that may arise in use of your position at HBL to derive benefits that are not available to others.
- Disclose potential conflicts to your manager /supervisor, HR representative.
- Ask for guidance if you are unsure whether a conflict of interest, or the appearance of one, exists.

For further guidance: Staff Service Rules

### 13. OUTSIDE PRESSURE (Safarish)

Use of outside pressure or influence (Safarish) to attain personal gains that includes but not limited to hiring, promotion, transfer, placement or any other material gain within the organization is strictly prohibited and any such attempt will be subject to strict Disciplinary Action/ Corrective Guidance.

### 14. SECURITIES TRANSACTIONS & INSIDER TRADING

You are never to engage in insider trading in securities. This means that you may not deal, advise or arrange for anyone else to deal, in any shares or other securities listed or trade on a recognized Stock Exchange, if you have information which you know or have reason to believe is non-public, price sensitive information, relating to those securities or the company concerned. This applies to both, whether you have received the information through your work or from any other source.

In addition to the law, you must also observe the internal rules on personal trading in securities in general and HBL securities in particular which the Bank puts in place and which apply to you.

You must not buy or sell stocks, commodities, foreign exchange or securities of any description without enough funds to meet the full cost thereof.

For further details and guidance, you may refer to [Policy on Prohibition of Insider Trading](#) and [SBP Treasury Code of Conduct for Banks](#)

### 15. MONEY LAUNDERING

The Bank fully supports the international drive against crime, including money laundering, and is committed to assisting the authorities in accordance with the law. The Bank has issued detailed guidelines to all business units to enable them to follow the [Anti-Money Laundering policy](#). Make sure that you are familiar with them.

You must report to Global Compliance of the Bank suspicious activities such as money laundering.

The key principles of Anti Money Laundering (AML) include the following:

- The identity of a customer beginning a business relationship or conducting any transaction should be established from official or other reliable identifying documents as may be prescribed by SBP from time to time. The Golden Rule is to **Know Your Customer**,
- The bank shall maintain all necessary records on transactions, both domestic and international for a minimum period as specified in Bank's Policy & Procedures. These documents should be available to the relevant authorities in the context of relevant criminal investigations and prosecutions.
- If any employee suspect that funds stem from money laundering, they should promptly report those suspicions to the Anti Money Laundering Department (AMLDD) and record the circumstances in writing as may prescribed by SBP from time to time.
- No employee can disclose to customers or any person when suspicious activity of any customer is being reported.

#### **Unusual Transactions in Staff Accounts:**

All employees must ensure that transactions in their staff accounts are commensurate with their profile and are prohibited from use of such accounts for money laundering. Any non-compliance will be dealt with under the disciplinary process laid down in the Staff Service Rules.

## **16. CUSTOMERS, VENDORS AND COUNTER PARTIES**

You should maintain highest standard of services while dealing with customers and maintain a helpful and cooperative attitude towards them.

In order to safeguard HBL's reputation for integrity, it is necessary for the employees not only to discipline their own actions but also to be aware of the character and actions of customers, vendors, and counter parties. Care must be exercised in selecting those with whom we deal. Each business/channel/area/unit of HBL should have processes in place for monitoring on the credit and character of customers, vendors and counter parties.

#### **Ethical Standards to be followed**

This Code does not apply directly to the company's business partners (i.e. vendors /suppliers). However, HBL does not want to be associated with business partners that do not have appropriate ethical standards.

## 17. ENVIRONMENT, SOCIAL and GOVERNANCE (ESG)

HBL is committed to Corporate Social Responsibility (CSR) based on efforts to integrate responsible practices, products and services into its core business activities. HBL supports the assessment and, where necessary, enhancement of HBL's and its customer's environmental, social responsibility and governance objectives, provision of sustainable green finance where environmental and social performance of our customers is a key business consideration across relevant sectors, products and geographies.

All employees are responsible for adhering to the ESG standards.

For further details and guidance, you may refer to HBL's Social and Environmental Management System Policy (SEMS).

## 18. PROTECTING BANK'S RESOURCES

All employees are responsible for safeguarding Bank's and the customers' tangible and intangible assets including cash, securities, business plans, customer information and physical property and services.

Copying, selling, using and distributing information, software and other forms of intellectual property in violation of license agreements are prohibited.

The use of email, telephone, fax and computers are primarily for business purposes. Personal communication must be kept to a minimum.

Stationery including letterheads is to be strictly used for business purposes only.

## 19. FRAUD, THEFT, BRIBERY & CORRUPTION OR ILLEGAL ACTIVITIES

Employees shall be alert and vigilant with respect to frauds, thefts, bribery, corruption or illegal activity. If any such activity comes to your attention, you must immediately report it to your immediate supervisor or Functional Head who will arrange for appropriate follow-up action to be taken. Failure to report and take necessary action on any such activity will be subject to disciplinary action.

You must not issue any incorrect account statement, salary certificate or any other information for any customer or staff member.

For further details and guidance, you may refer to **Anti-Fraud Policy and Policy for Prohibition of Bribery & Corrupt practices (ABC)**

## 20. ACCURATE ACCOUNTING, RECORD-KEEPING AND FINANCIAL REPORTING

As a publicly listed company, HBL is subject to strict requirements concerning financial reporting with respect to compliance with IFRS/SBP Regulations as may be applicable and good accounting practices. Reliable, transparent, consistent and timely reporting of financial performance enhances investors' and other stakeholders' confidence in HBL and provide equal opportunity to act on such information.

Bank's books, records, accounts, and reports must accurately reflect its transactions, and must be subject to an adequate system of internal controls and disclosure controls to promote the highest degree of integrity.

An employee must not make a fake claim for reimbursement of any expenses.

For further details and guidance, you may refer to [Accounting and Disclosure Policy](#) and [Record Retention Policy](#).

## 21. INFORMATION, COMMUNICATION, MEDIA / PUBLIC SPEAKING

You must obtain the recommendation of your Functional Head and approval of HR and the President before submitting work for publication or making a public speech or appearing in a public interview.

Generally, approval will be granted if the writing or speech furthers HBL's business interests and does not involve the disclosure of the Bank's confidential information. It should be ensured that the public comments (either verbal or written) made in a private capacity are not attributed as official comments of the Bank.

You must not divulge any information relating to employees, customers or the Bank over media including social media. You must exercise prudence in expressing your views over the media on sensitive matters involving i.e. religion or politics and avoid personal disputes with any person over the media.

For further details and guidance, you may refer to [Media Policy](#) and [Social Media Usage Guidelines](#)

## 22. COPYRIGHTS

You will not make unauthorized copies of copyrighted materials/bank's proprietary information such as Bank's documents, policies, manuals, instructions, computer programs etc. Any work that you undertake for the Bank is the sole property of Bank and that should be kept secret and treated as copyrighted.

## 23. REGULATORS AND AUDITORS

Compliance with laws, regulations and ethical standards is an important element of your obligations to our customers, stockholders, and general public and other staff. It is essential for our success that we take



compliance seriously. You as an employee of the Bank should think of compliance as your responsibility and will be held accountable for all compliance related activities.

We must be open and co-operative with our regulators and auditors and keep them fully and promptly informed of everything, which should reasonably be disclosed to them.

## 24. DRUG-FREE WORKPLACE

HBL is committed to providing a safe work environment and fostering the well-being and health of its employees. This commitment is jeopardized when you illegally use drugs or alcohol on the job, come to work with these substances present in your body, or possess, distribute, or sell drugs in the workplace. Therefore, It is a violation of Bank policy:

- To possess, sell, trade, or offer for sale illegal drugs or otherwise engage in the illegal use of drugs or alcohol on the job.
- To report to work under the influence of illegal drugs or alcohol i.e. with illegal drugs or alcohol in your body.
- To use prescription drugs illegally. (However, nothing in this policy precludes the appropriate use of legally prescribed medication.)

It is the responsibility of the respective supervisors to counsel employees whenever they see changes in performance or behavior that suggests an employee is under the influence of alcohol or other drugs. Although it is not the supervisor's job to diagnose personal problems, he / she should encourage such employees to seek help and advise them about available resources for getting help. Everyone shares responsibility for maintaining a safe work environment.

The goal of this code is to balance our respect for individuals with the need to maintain a safe, productive, and drug-free environment. The intent of this policy is to offer a helping hand to those who need it, while sending a clear message that the use of illegal drug and alcohol is incompatible with employment at Habib Bank Limited.

Violations of this policy are subject to disciplinary action up to and including termination from service.

## 25. EQUAL EMPLOYMENT OPPORTUNITY (EEO)

HBL is an equal opportunity employer in hiring and promotion practices, benefits and wages. The Bank will not tolerate discrimination against any person on the basis of race, religion, color, gender, age, marital status, national origin, sexual orientation, citizenship, disability (where the applicant or employee is qualified to perform

the essential functions of the job with or without reasonable accommodation), or any other basis prohibited by law in recruiting, hiring, placement, promotion, or any other condition of employment.

We treat all our employees, customers, suppliers and others with respect and dignity.

## 26. DISCRIMINATION OR HARASSMENT

HBL encourages a work environment where our employee's differences are valued and respected. We promote equality of gender, race and religion and prohibit sexual or any other kind of discrimination, harassment or intimidation whether committed by or against a supervisor, coworker, customer, vendor or visitor.

No employee shall because of race, creed, colour, national/ethnic origin, gender/sex, marital status, sexual preference, religion, age or physical disability, be subjected to any discrimination or to any harassment by another employee of the Bank in line with the Anti-Harassment Policy.

### **GBVH (Gender Based Violence & Harassment)**

GBVH is violence or harassment directed against a person because of their gender.

If you believe that you are being subjected to discrimination or harassment you should immediately report it to CHRO under the laid down process.

## 27. ZERO TOLERANCE TO WORKPLACE VIOLENCE

The Bank is committed to creating and maintaining a working, learning, and customer care environment, which is free from violence. Mutual understanding and respect toward all individuals are essential elements for excellence in professionalism, existence of a safe and healthy workplace, and maintenance of a corporate culture, which serves the needs of the community. The Bank prohibits violent acts or threats of violence. Any employee, who commits or threatens to commit a violent act, will be subject to disciplinary action.

The Bank has zero tolerance for any kind of violence, including GBVH against any member of the workforce or its property. Any person who makes threats, exhibits threatening behavior, displays arms / ammunitions, resorts to spitting and usage of abusive language or engages in violent acts that may damage the Bank property shall be subject to disciplinary action.

The Bank will not tolerate any level of violence in the workplace or in any work related setting. Violations of this code must be referred to the Employee Relations Department immediately.

## 28. NEPOTISM

While there is no prohibition against the employment of close relatives, the integrity of the HR process must be maintained

Therefore, no one shall serve on a committee; make personal recommendations or decisions, influence any person making decisions such as appointment, retention, transfer, advancement or promotion affecting a close relative. Any employee discriminating on any such basis will be subject to disciplinary action.

## 29. OTHER ACTS OF MISCONDUCT

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

- Theft, fraud, dishonesty with business or property of the Bank or any other organization / any person inside or outside the Bank or inappropriate removal or possession of property
- Any act whether inside or outside the bank which poses reputational risk for the Bank;
- Making or arranging bets or wagers
- Falsification of employment documents / data to obtain employment
- Tampering the office records
- Negligence or improper conduct leading to damage of Bank-owned or customer-owned property or damage to the reputation of the Bank.
- Conviction for a criminal offence within or outside the office.
- Violation of safety or health rules
- Smoking in prohibited areas
- Spitting within Bank's premises
- Unauthorized absence from duty
- Illegal strike or go slow tactics
- Misuse of Official Stamps / Letterheads / Telephones / Computers & other items Breach or request others to breach the requirements of the Code
- Failure to promptly raise a known or suspected breach
- Failure to cooperate in HBL's investigations of possible breaches
- Retaliation against any employee for reporting integrity concerns in good faith
- False reporting under this Code with malicious intent

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

### 30. RESPONSIBILITIES AFTER LEAVING THE BANK

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

You have agreed to and under the law are to maintain confidentiality; therefore, you must maintain the same confidentiality, professionalism and secrecy after leaving the employment of the bank and not disclose any Confidential Information, except in accordance with the law. Former members of staff should not use or take advantage of personal, confidential or official information, they may have obtained in their capacity as the Bank staff.

### 31. MY ACCEPTANCE OF HBL’S CODE OF ETHICS & BUSINESS CONDUCT

I acknowledge that I have read and understood HBL’s Code of Ethics & Business Conduct. I hereby agree to accept and abide by provisions of the Code and act in accordance with the law, Banks Policies, Procedures and Applicable Regulations and will immediately report any actual violations of the Code to Chief Human Resources Officer (CHRO).

Signature	_____
Name	_____
Functional Designation	_____
Function	_____
Branch/Location	_____
Personnel Number	_____
Date	_____

*This signed and completed form must be returned to HBL HR Operations Karachi.*

**Witness-1**

Name:  
Address:  
CNIC#:

**Witness-2**

Name:  
Address:  
CNIC#: