

GIB's Code of Conduct

Background

This Policy contains Gulf International Bank B.S.C.'s (GIB or the Bank) Code of Conduct (referred to as the 'Code' or 'Policy'). These policies shall standardise expectations of behaviour and performance while encouraging positive effort and professional pride at work.

Purpose

The Code is designed to guide the Bank's resources, through best practices set at the highest standards of ethical and professional conduct required by a reputable financial institution. It serves as a guide for each person in their day-to-day actions, their conduct, decisions and illustrates how they live their values as individuals and as a team so we can always do the right thing and safeguard our most valuable asset, the reputation of GIB.

The Bank's clients and other stakeholders expect the Bank and its BAU resources to abide by the Code, local laws and regulations as well as Bank's policies and procedures as they carry out their duties and functions.

The objective of developing and releasing this Code is to promote and drive a culture of ethics, honesty and professionalism within the organisation and amongst its BAU resources. It also promotes a positive culture of dignity and respect, free from bullying, harassment and discrimination.

We believe that the behaviour of each person internally and / or externally reflects on the entire organisation and its reputation and this Code serves to guide them in what the minimum expectations of the Bank.

Please note that where mandatory local laws and regulations contain provisions that govern the subject matter provided for in this Code, this Code is to be read in conjunction with such local laws and regulations and, in the event of a conflict between the two, such local laws and regulations shall prevail.

Scope

This Code shall apply to GIB and branches except for GIB UK and all persons based in New York together with the Board of Directors who have their own Code of Conduct.

These people are covered by this policy:

- All Divisions

Roles and Responsibilities

The following roles and responsibilities have been identified in relation to the implementation and execution of this policy:

Area of Responsibility	Responsible	Accountable
<ul style="list-style-type: none">The Code applies to all GIB employees and senior management, and all those who work for and on behalf of GIB (whether permanent, temporary, contractors, consultants, agents or interns) collectively known as 'BAU Resources' <p>Read the Code, review it regularly and ensure compliance.</p> <ul style="list-style-type: none">Observe high standards of integrity and fair dealing. Be honest and straightforward in dealings with customers.Act with high integrity, transparency and in ethical manner at all times.Act with due skill, care and diligenceObserve in full any obligations of confidentiality, including with respect to customer information.Observe proper standards of market conduct and avoid action that would generally be viewed as improper.Take reasonable care to safeguard the assets and deposits of customers for whom the Bank is responsible.Pay due regard to the legitimate interests and information needs of the customers and communicate with them in a fair and transparent manner.Take reasonable care, when dealing with customers who are entitled to rely on the advice or discretionary decisions, to ensure the suitability of such advice or decisions.Comply with all applicable laws and regulations and act in an open and co-operative manner with the local regulator and other regulatory / supervisory bodies whose authority they come underEmployees must not in any form disrupt their own and others' workflow, go on a strike or incite them.Employees are required to be objective while perform their tasks and strive to elevate	BAU Resources	BAU Resources

Area of Responsibility	Responsible	Accountable
<p>their own professional skills while performing these tasks.</p> <ul style="list-style-type: none">• Ensure to follow accounting standards, industry best practice (such as ensuring that information to clients is clear, fair, and not misleading), transparency and rules concerning potential conflicts of interest.• Employees must demonstrate professional integrity and adhere to GIB's working hours policy.• Employees must instil and maintain the compliance culture by abiding by this Code, adhering to applicable GIB policies and procedures, and complying with all relevant laws and regulations.• Certain obligations that arise during the employees' employment may continue after their employment ends with the organisation. To the extent permitted by local law, such obligations that extend beyond the period of employment with the Bank include responsibility to return all Bank assets in their possession, to maintain the confidentiality of personal, proprietary or confidential information about GIB or its clients, shareholders, vendors, suppliers, business partners or former colleagues, and to cooperate with any appropriately authorized internal or external investigations or litigation.• Failure to comply with the Code, knowingly or unknowingly, may result in disciplinary action up to and including immediate termination of service, as well as exposing the employee and GIB to possible regulatory, civil and / or criminal penalties or legal action. It may also weaken the Banks customers' confidence and put GIB's reputation at risk.		
<hr/> <p>Create a positive work environment in which their team members feel comfortable raising concerns, especially about potential legal or ethical issues.</p> <ul style="list-style-type: none">• It is a manager's responsibility to lead in promoting a culture of dignity and respect, <hr/>	Line Managers	

and take timely, relevant action to resolve concerns.

- Managers are required to openly discuss requirements of the Code with their team members and ensure they understand and follow the standards defined in the Code and related policies. Managers are expected to frequently reinforce the importance of ethics and compliance to their staff and within the organisation.
- Where situations arise or are suspected, or in case of any questions or concerns arising from this Code, or if someone feels uncertain about a course of action, managers should encourage them to raise the matter or at any time and seek the advice of the Code Specialists (see Appendix) or the Country Head of Human Resources.
- When evaluating a manager's performance, the Bank shall consider their conduct in relation to its values, the law, the Code and our policies. Managers are required to be alert to situations or actions that may violate the letter or spirit of the Code, policies or procedures.
- Managers must support and protect any employee who, in good faith, reports a potential violation of the Code. Managers must never engage in or tolerate retaliatory acts made against anyone working for or on GIB's behalf.
- Managers who fail to take action and report misconduct may be held responsible for their failure to report misconduct or to take steps to address or remediate an issue.

General Guidelines

BAU resources are required to affirm on an annual basis that they have read, understood and shall comply with the Code at all times.

Where training is required, they are required to complete such training on a timely basis.

Prior to joining the Bank, BAU resources are required to provide an affirmation that they have read and understood the Code, will comply with it and will report suspected violations as required by the Code.

The Code has the following sections which provide detail on the obligations and scope applicable to GIB's BAU resources:

- Reporting Violations
- Allegations & Their Confidentiality
- Investigations
- Non-Retaliation
- Maintaining Integrity
- Business Records & Disclosure Documents
- Safe & Respectful Workplace
- Upholding the Law & Adhering to Legal & Best Practices
- Restriction on Insider Trading
- Bribery and Corruption
- Anti-Fraud
- Anti-Money Laundering and Sanctions
- Customers' Complaint Handling
- Conflict of Interest
- Managing Conflicts of Interest
- Acting Within Scope of Authority
- Personal Relations
- Employment of Relatives
- Treatment and Selection of Suppliers
- Financial Affairs
- Gifts, Entertainment and Hospitality
- Outside Interests and Other External Activities
- Cyber Security
- Modern Slavery
- Confidentiality of Information and Data Protection
- Confidentiality Classification
- BAU Resources Responsibilities
- Protect GIB Property
- GIB's Trademark and Brand

- External Representation
- Responding to Government or Regulatory Inquiries
- Personal Use of Social Media
- Compensation and Incentives
- Our Community
- Banking Confidentiality