

Policy

Title: **Group Code of Conduct**

Approved by: Board Corporate Governance, Nomination and Remunerations Committee

Last reviewed: 16 Jan 2024 (next review to be within one year of this date or whenever required for regulatory, legal, statutory or business requirements)

Exceptions: Corporate Governance and Nomination Committee is authorized to approve exceptions and immaterial changes. Material changes to be approved by the Board. (Request for Approval must be submitted for implementation of any exceptions or changes)

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SECTION 1 - INTRODUCTION

PURPOSE

The Code of Conduct sets the rules that outline the proper professional and behavioral practices governing the relationship among staff members and those by which Masraf Al Rayan operates and conducts its daily business with its shareholders, customers, vendors, competitors, government and regulatory authorities, the media, and any other party with whom it has any type of contact. Furthermore, the Code of Conduct illustrates the corporate principles and values that guide the decisions, procedures and systems of Masraf Al Rayan and is to be read in conjunction with the HR Policy of the Bank.

SCOPE

This Code of Conduct applies to the directors, officers and employees of Masraf Al Rayan and its subsidiaries. The Code also applies by extension, and insofar as their contracts so provide, to third parties who have entered into contracts to provide services to the Bank.

DEFINITIONS

Word/Term	Definition
Masraf Al Rayan - The Bank	Masraf Al Rayan and any of its subsidiaries and branches inside Qatar
HR	Human Resources
The Code	The Code of Conduct elaborated under this document
The Director	The member of the Board of Directors
The Officers	The members of the senior management of Masraf Al Rayan ranking from grade 4 and above.
Third parties	Contractors, vendors, outsourced parties, suppliers and other business partners who provide services for Masraf Al Rayan.
Confidential Information	Any non-public information pertaining to the Bank
QCB	Qatar Central Bank
QE	Qatar Exchange

LEGISLATIVE CONTEXT

This Code of Conduct is binding to all Masraf Al Rayan employees. All subsidiaries of Masraf Al Rayan must adopt and implement this Policy taking into consideration their local corporate governance structures, and legal and regulatory requirements without undue delay.

SECTION 2 - POLICY

PRINCIPLES

The Code of Conduct principles require a honest and ethical behavior to deal with actual or apparent conflicts of interest between personal and professional relationships, in addition to the highest level of confidentiality of non-public information and fair dealing within and outside Masraf Al Rayan work environment. It also urges full compliance with applicable laws, rules and regulations and addresses abuse or misapplication of Masraf Al Rayan properties, policies and business opportunities.

Masraf Al Rayan directors are required to comply with a set of values and responsibilities including among others: the general standards of conduct, the duties of the directors in terms of integrity, impartiality and discretion, the conflicts of interest, the financial interests, the disclosure of financial interests, the confidentiality, and the compliance with the local laws and regulations of Local Corporate Governance Code, Local Companies Laws, QCB regulations, QE regulations and any applicable laws or regulations.

Officers and staff members are equally bound by a set of behavioral responsibilities including among others the employee conduct, the use of position, the behavioral conduct in terms of banking supervision and safeguard of the bank property and information, the conflicts of interest, the outside activities and reporting of violations and disciplinary actions.

POLICY

1.	Code of Conduct for Masraf Al Rayan Board of Directors
	A director may be requested hereunder to sign an Acknowledgment and/or to provide any information related to his/her family members and/or subsidiaries in which he/she holds any shareholding or interests. In the absence of a signed Acknowledgment, the Company Secretary will be required to record the Board's acknowledgment in the relevant meeting minutes.
1.1	General Standard of Conduct
	As a director, you are required to conduct yourself at all times in a manner that fits your status as a director of Masraf Al Rayan and your conduct should not bring the Bank into disrepute.
1.2	Duties of Directors
	1.2.1 Integrity: As a director, it is essential that you act honestly and truthfully in regard to the motivations and consistency for your and Masraf Al Rayan's actions, values, methods, measures and principles.
	1.2.2 Impartiality: Masraf Al Rayan places great value in the varied cultures, beliefs and backgrounds of its directors and staff. Your decisions are expected to be based on objective criteria. In addition, tolerance, courtesy and respect are expected of you in all your dealings with staff and colleagues.
	1.2.3 Discretion: You are expected to exercise the utmost discretion in regard to all matters relating to the Bank, to have the ability to make responsible decisions and to refrain from furthering your personal interests or disclosing Confidential Information
1.3	Conflicts of Interest
	As a director, you are expected to have a broad knowledge of the Conflict of Interest Management Policy approved by the Board of Directors and you are required to comply with the content of this policy at all times.
1.4	Gifts, hospitality, favors or gratuities
	The giving or acceptance, from any source other than Masraf Al Rayan, of gifts, hospitality, favors, gratuities, honors or awards in connection with your duties as member of Masraf Al Rayan's Board is to be strictly avoided, as such behavior could be construed as an attempt to influence your actions or the actions of others. However, on an exceptional basis, limited hospitality and small gifts of a social or customary nature may be accepted provided that they are of immaterial value not exceeding QR 300. Gifts of immaterial value should be disclosed to the Chairman of the Board and the Group Head of HR through the Company Secretary on a need to know basis only. Any gifts of greater value should be disclosed and submitted to the Chairman of the Board and the Group Head of HR through the Company Secretary in order to decide whether to grant them to charity or to use them in any other way decided by the Corporate Governance and Nomination Committee.
1.5	Financial Interests
	1.5.1 Generally, a director is free to conduct his or her personal financial affairs as he or she sees fit. However, personal financial affairs should be conducted in a manner that will: (i) avoid actual or apparent conflicts between personal interests, whether direct or indirect, and the interests of Masraf Al Rayan; and (ii) not compromise the independence of judgment or action required in the performance of the Bank's duties.

	1.5.2 Additionally, a director shall refrain from using, or providing to others, any confidential information to which he or she may have access because of his or her affiliation with Masraf Al Rayan for any purposes whatsoever. This obligation shall also continue after separation from the Bank.
	1.5.3 A director must refrain from Short Term Trading in securities issued by the Bank; and knowingly acquiring, directly or indirectly, for his or her own account or the account of others, any Financial Interest in the Bank during the Stop Trading Periods stipulated under QE Internal Regulations or during any other period as it may be determined by Masraf Al Rayan Company Secretary.
	1.5.4 In addition, if a director becomes aware of the fact that a member of his or her Immediate Family (as defined under QCB instructions or any other applicable regulations in Qatar or under any jurisdiction where Masraf Al Rayan operates) has any financial interests in Masraf Al Rayan, they should report the financial interests to the Group Head of Compliance through the Company Secretary.
	1.5.5 No director should use any privileged information, i.e., information obtained by virtue of his being a director, to his or his related parties' interest. This restriction extends to the use of any privileged information to financially benefit or gain competitive advantage in any way by being able to better reposition himself / herself or his/her entity/related party in a competitive market. In the event such an incident has occurred, the director shall make full disclosure to the Board of Directors which shall be duly recorded in the minutes.
1.6	Disclosure of Financial Interests
	A director shall disclose to the Group Head of Compliance through the Company Secretary any financial interests of his or her own or that of his or her immediate family that exceeds any limit as stipulated under QCB Instructions or any other applicable regulations in Qatar or under any other jurisdiction where Masraf Al Rayan or any of its subsidiaries operates.
1.7	Confidentiality
	1.7.1 Confidential information shall not be disclosed to anyone external to Masraf Al Rayan, including to immediate family members.
	1.7.2 Intellectual property pertaining to the Masraf Al Rayan may not be used for personal benefit or for the benefit of others.
	1.7.3 The above obligations continue after separation from the Bank.
1.8	Masraf Al Rayan Property, Assets and Resources
	Masraf Al Rayan property, assets and resources should be used with the utmost care guarding against waste and abuse. Masraf Al Rayan services, supplies or facilities should not be used for personal gain
1.9	Whistleblower protection
	1.9.1 The directors reaffirm their support for and commitment to the Masraf Al Rayan Whistleblowing Policy, which is comprised of the duty on staff members to report suspected misconduct to the Group Head of Compliance in addition to the duty on the Bank to protect a whistleblower from reprisals or retaliation.
	1.9.2 The Board of Directors will encourage reporting of any behavior by directors which violates the Code and will not tolerate retaliation against any person who in good faith reports such violations to the Chairman of the Audit Committee and/or the Company Secretary and/or the Group Head of Compliance.

1.10	Local Laws
	A director must observe all applicable national laws and fulfill all personal obligations stipulated under such laws.
1.11	Masraf Al Rayan policies and regulations
	A director should observe all the policies approved by the Board of Directors, including but not limited to the Corporate Governance Policy and Framework, the Terms of Reference of the Board of Directors, the Conflict of Interest Management Policy, the Disclosure and Transparency Policy.
1.12	Disclosure or Delivering Statements to Media
	A director will not share any information regarding Masraf Al Rayan, its business and/or affairs with media without the prior written approval of the Chairman of the Board of Directors.
1.13	Acknowledgment (Directors)
	I agree to abide by the Masraf Al Rayan Code of Conduct, approved by the Board of Directors and any future amendments communicated, as well as any other relevant legislation and policies, in the performance of my duties. If unsure of an appropriate course of action, I agree to consult with the Chairman of the Board or the Company Secretary.
	<p>Signed:.....</p> <p>Name of Director:.....</p> <p>Date:.....</p>

2.	Code of Conduct for Masraf Al Rayan Staff
2.1	Masraf Al Rayan Duty
	<p>2.1.1 Masraf Al Rayan is keen to provide a workplace free from discrimination and harassment and to ensure that the best possible standards of service delivery and professional conduct are achieved.</p> <p>2.1.2 Masraf Al Rayan, as an employer, has primary responsibility for insisting that all employees refrain from unacceptable behavior and poor performance and to take appropriate action when such behavior and performance does occur</p>
2.2	Staff Duty
	Every person at Masraf Al Rayan, regardless of their position or tenure, has an individual responsibility to ensure that they do not discriminate against or harass other employees or clients, engage in any unacceptable behavior, or perform poorly in the conduct of their duties. Contractors, vendors, outsourced parties and consultants also are to comply with Masraf Al Rayan Code of Conduct and ensure compliance with legislative and regulatory obligations.
2.3	Breaches
	Breaches of the Code of Conduct will not be tolerated. Consequences for breaching the Code of Conduct may include: dismissal; suspension; reprimand; counseling or extended probation.
2.4	Your observance of Masraf Al Rayan Values
	<p>2.4.1 At all times, your conduct as an employee should be governed by Masraf Al Rayan's four Values (United, Reliable, Committed and Excellence).</p> <p>2.4.2 This code is mainly about Masraf Al Rayan values. When you're faced with a difficult decision:</p> <ul style="list-style-type: none"> o Be United with your friends and colleagues in doing the right thing. o Ensure that you reinforce Masraf Al Rayan's reputation as a Reliable organization. o Become a brand ambassador for Masraf Al Rayan but demonstrating that we are all Committed to Excellence.
2.5	Compliance
	2.5.1 At all times comply not just with the letter of all local laws, but also the spirit of the laws, regulations, Masraf Al Rayan policies, instructions and this Code.
	2.5.2 Masraf Al Rayan is a guest in each country we operate in, so only offer products or services if they comply with local laws and regulations – even if the products or service complies with the law in other countries
	2.5.3 If local laws and regulations are more restrictive than Masraf Al Rayan policies, instructions or this Code, abide by the local laws and regulations. If there is no local law or regulation on a particular issue, or if local laws and regulations are weaker than Masraf Al Rayan policies, instructions or this Code, the Masraf Al Rayan policies, instructions and this Code apply
	2.5.4 It is YOUR responsibility to find out about this Code, Masraf Al Rayan policies and instructions, and to abide by them – unfortunately you can expect disciplinary action or even dismissal if you don't.
	2.5.5 Exceptions to the Code require prior written approval from the Chief Executive Officer or your Country General Manager, subject to giving notice of such approval to the Group Head of HR for direct reporting to the Board.

<p>2.6</p>	<p>Speaking Up</p> <p>2.6.1 Report to your Line Manager or the Group Head of Compliance any breaches of this Code, Masraf Al Rayan policies and instructions, criminal acts or any issue which you suspect or believe would damage the reputation of Masraf Al Rayan. Don't be afraid - if you suspect that something is wrong, but are not absolutely sure; it is still better to raise the issue. The best case is that your suspicion is wrong and there is nothing to worry about. The worst case is that you are right and if you are right but didn't report it you will be considered an accomplice.</p>
	<p>2.6.2 If you speak up about an issue, your report will be treated with sensitivity and the matter will be investigated in confidence. Should it be appropriate you will be notified of the outcome.</p>
	<p>2.6.3 For more information about issues and cases to be reported, you should read and comply with the bank Whistle-blowing Policy or consult the Head Group of Compliance.</p>
<p>2.7</p>	<p>Co-operating with our regulators</p> <p>2.7.1 Masraf Al Rayan is open and transparent with our regulators, so don't try to cover up a problem</p> <p>2.7.2 If you become aware of a regulatory breach, you have to report it to your line Manager or the Group Head of Compliance. They will work out the best approach to take with the regulator.</p>
<p>2.8</p>	<p>Customer confidentiality and data privacy</p> <p>2.8.1 It's a serious legal offence to reveal customer information to anyone outside the bank, or between Masraf Al Rayan branches, companies, or even within the same office, unless:</p> <ul style="list-style-type: none"> a) The customer has given consent and you are authorized to do so, or b) You are compelled to do so (e.g. by a court order or regulator), or c) Masraf Al Rayan has to protect its assets (e.g. in fraud or debt recovery cases), or d) To process or handle data for the performance of legitimate Bank activity in accordance with Bank policies and procedures and you are authorized to do so. <p>2.8.2 Ensure all private data and information held by the bank about potential, current, or past customers, staff, suppliers and other parties is:</p> <ul style="list-style-type: none"> a) Accurate, up-to-date and not biased or misleading b) Only used for the purpose for which it was provided c) Kept securely and only as long as necessary d) Relevant, not excessive or unnecessary e) Not discussed in areas where you can be overheard
<p>2.9</p>	<p>Mis-selling and misrepresentation</p> <p>2.9.1 Don't sell a product that is unsuited to the customer or their needs – it is YOUR responsibility to know the products well enough to judge this. Mis-selling exposes the bank to penalties, legal action and damages our reputation</p> <p>2.9.2 Special rules apply to the sale of investment products and giving investment advice. Please consult The Group Head of Compliance</p>

	<p>2.9.3 Clearly explain product features, both verbally and in marketing material. Advertising material must be pre-approved by the Group Head of Legal and Group Head of Compliance to ensure it:</p> <ul style="list-style-type: none"> a) Is accurate, not offensive to any culture, countries, organizations, groups or individuals and is easily understood b) Complies with local laws and regulations and explains any significant risks c) Does not make unfair comparisons to competitors
2.10	Complaints
	2.10.1 All customer complaints must be recorded – they are the best way for us to learn how we can improve
	2.10.2 All complaints must be handled and rectified courteously, efficiently and swiftly. Put yourself in other person's shoes – how would YOU like to be treated in that situation?
	2.10.3 Any replies which may have legal implications on behalf of Masraf Al Rayan must be preapproved by the Group Head of Legal.
2.11	Bribery & Corruption
	2.11.1 Reject all forms of bribery and corruption. Don't:
	<ul style="list-style-type: none"> a) Offer or accept any unofficial or unconventional payments, gifts or benefit to or from government officials or others in positions of power or influence b) Offer to pay a customer, or a customer's employee, for their business
	2.11.2 If you are approached by anyone and you think it might be a form of bribery or corruption, report to the Group Head of Compliance immediately. This applies in private and working life – you can't separate the two in these matters.
2.12	Money Laundering & Fraud
	2.12.1 Don't help criminals disguise the illegal origin of funds - we become an accomplice to their crimes if we do:
	<ul style="list-style-type: none"> a. Identify every customer using reliable documents b. Know enough about your customer to be able to identify transactions which do not fit with their business or personal situation c. Report suspicious transactions to the Country Head of Compliance d. Keep safe any customer and transactional records which may be required in an investigation e. Don't advise customers if they are under suspicion of money laundering
	2.12.2 Always follow the bank's systems, controls, policies and instructions and this Code – if you don't, it greatly increases the risk of fraud
	2.12.3 Report strange or unusual events (e.g. requests for unconventional transactions), deals which don't have clear purpose or are too good to be true
	2.12.4 Report actual or suspected frauds immediately to the Group Head of Compliance. He will investigate the matter further

	2.12.5 Read and comply with the Group Compliance Policy & Manual, AML Policy and Fraud Policy
2.13	Conflict of Interest
	2.13.1 Personal conflicts of interest occur when your own interest (or the interest of your friends, colleagues, relatives, associated companies, etc) and those of the bank become confused
	2.13.2 Business conflicts of interest occur when Masraf Al Rayan has two customers who have a conflict of interest with each other, or the bank has confidential information about one customer that could be of benefit to another customer relationship
	2.13.3 Protect yourself and the bank by not allowing yourself or Masraf Al Rayan to be placed in a conflict of interest situation from the outset. If this isn't possible, declare the conflict immediately to your line Manager or the Group Head of Compliance.
	2.13.4 Read the Group Conflict of Interest Management Policy for more information on this subject
2.14	Gifts and hospitality
	2.14.1 Don't give or receive cash, gifts or other benefits, except when: <ul style="list-style-type: none"> a) The items are of nominal value (QR 300 or less), or b) It is reasonable business and entertainment hospitality (with prior approval from your line Manager) c) The item is valuable, but to refuse it would cause unnecessary offence. In this situation immediately declare the items to your line Manager and to Group Head of HR who will donate them to staff or charity events.
	2.14.2 Unauthorized acceptance of such may result in serious disciplinary action including summary dismissal.
2.15	Insider Trading
	2.15.1 Don't give tips about, or trade (i.e. buy, sell or exercise options) in securities for your own account or for the account of relatives or friends, if you have information about the issuer or securities which is non-public, or price-sensitive
	2.15.2 Relating to Masraf Al Rayan shares: <ul style="list-style-type: none"> a. Don't trade during "closed periods" (as determined under QE Internal Regulations) or dates advised by internal email circulation b. All employees require approval from their line manager and the Group Head of Compliance trading in Masraf Al Rayan shares
	2.15.3 You must read and observe the insider trading rules elaborated in the Conflict of Interest Management Policy approved by the Board of Directors or any of its sub-committees.
2.16	Personal Conduct
	2.16.1 Treat others in the way that you would like to be treated yourself – with dignity, respect and concern for their health and safety. Gain respect and confidence by remaining polite, calm and collected with colleagues and customers
	2.16.2 Project a professional image by dressing appropriately and maintaining good personal hygiene

	2.16.3 Manage your own personal finances in a manner suited to a banker and do not borrow or lend money to Masraf Al Rayan colleagues
	2.16.4 Don't use the bank's stationery/ time for personal matters
	2.16.5 Masraf Al Rayan is an equal opportunity employer and will not tolerate discrimination and harassment in the workplace
	2.16.6 You are expected to disclose any medical condition that would inhibit or prevent you from performing their duties and meeting the requirements of your position
	2.16.7 You should accept that professional responsibility must take precedence over personal aims, needs and views. You are expected to exercise professional judgment within the parameters of the Masraf Al Rayan's purposes, strategic directions, policies and practice
2.17	Use of computers, email, internet, phones, letterheads, and any other property of Masraf Al Rayan
	2.17.1 You are expected to use the property of Masraf Al Rayan in a proper manner such that the risk of damage to property is minimized. Where damage to property has occurred and it is determined by your line manager that the damage was the result of willfulness, disciplinary action may be taken and remedial processes initiated
	2.17.2 It is unacceptable to use the property of Masraf Al Rayan for personal reasons where there is significant cost arising to Masraf Al Rayan, either financially or operationally
	2.17.3 You should not publicly represent yourself as a spokesperson for Masraf Al Rayan without prior permission from the Group Chief Executive Officer. Representations include the use of letterheads, email, internet facilities and other property of Masraf Al Rayan in such a manner as to create the impression to another agency or the public that you have the authority to speak or act on behalf of Masraf Al Rayan.
2.18	Other Unlawful Activities
	2.18.1 It is unacceptable for an employee to engage in any form of illegal activity during work hours or in the context of their work. Furthermore, if you are involved with any illegal activity outside work, which results in you being charged with offences that may compromise the reputation or operation of Masraf Al Rayan, you are required to inform your line manager who will discuss with you the impact of the charges on your work and Masraf Al Rayan as an organization and initiate organizational responses as appropriate.
	2.18.2 Examples of types of unlawful activity which may result in disciplinary action include: Dishonesty and theft; Misappropriation of property; Receiving stolen property; Fraud; Vandalism; Health and safety breaches; Discrimination and harassment; Assault.
2.19	Absenteeism
	Non-attendance at work, poor time-keeping habits (e.g. regularly arriving late for work) and leaving work to do private business without approval is unacceptable. If you are absent, you must advise your line Manager as soon as possible and by 8.30 am on the day of your absence. You always need a satisfactory reason for absence (e.g. illness).
2.20	Avoidance of Duties
	Sleeping at work or being away from work for extended periods without an acceptable reason or approval may indicate an unwillingness or inability to meet the requirements of the job. You always need a satisfactory reason or approval for avoiding duties.

2.21	Intimidation
	Intimidation of colleagues, clients, consultants or contractors is unacceptable. Examples of the types of intimidation include: Coercion and threats; rude language, including inappropriate humor; domineering and menacing behavior; causing fear; willful disrespect for another's political, cultural or religious beliefs; sexual harassment.
2.22	Subordination
	You must comply with reasonable and lawful instructions, whether from your own team leader / manager or from senior management, where applicable. Instructions must be consistent with Employment Contracts and Job Descriptions.
2.23	Recruitment and Staff Management
	If you are involved in the recruitment of staff, you must ensure that appointments are made on the basis of merit and in accordance with the relevant Masraf Al Rayan hiring policies and procedures. You must maintain independence in any appointment, or any other decisions relating to discipline, promotion or pay and conditions for any other employee (or prospective employee) to whom you are related, or with whom you have a close personal relationship.
2.24	Disclosure of Official Information
	You must not use any confidential information obtained in the course of your employment with Masraf Al Rayan for any private purpose outside your employment, or for any purpose other than that for which it was obtained, except in the pursuit of Masraf Al Rayan business. The restrictions on disclosure of confidential information include information of a commercial nature howsoever it is obtained, whether in the course of your employment or otherwise. This is essential in order to safeguard the interests of Masraf Al Rayan.
2.25	Whistleblower Protection
	Every staff member must read and support Masraf Al Rayan Whistle-blowing Policy, which is comprised of the duty on staff members to report suspected misconduct to the Group Head of Compliance in addition to the duty on the Bank to protect a whistleblower from reprisals or retaliation.
2.26	Disciplinary Rules
	It is impossible to list all the rules and standards that you must adhere to as an employee of Masraf Al Rayan in a single document. This Code of Conduct outlines some general standards and you must ensure that you are aware of any other rules that apply to your profession, position and workplace. A breach of this Code, or any other applicable conditions or rules, may render you liable to disciplinary action.
	Personal Password and Computer Security
	Employees granted access to the Bank's main computer or other computerized systems via a password allocated to them have a responsibility to maintain the integrity of that password, and not divulge it to other persons, nor write it down so that others may find and use that password. Divulgence or pressure to elicit such information by another employee, regardless of seniority, would be considered most seriously by Management and could provide grounds for summary dismissal.
	After finishing working with the computer, the screen must be logged off so that no other person can access the computer using another person's password.

	Bank Property
	Employees are responsible for all Bank property in their possession or under their disposal and for taking the necessary precautions for its safe keeping and maintenance. Employees are not permitted to use Bank tools or other property outside the place of work without the express approval of their respective Group Business Head. Upon termination of contract by either party, all tools or materials in the employee's possession must be returned to.
	Prohibition to Borrow Money from Another Financial Institution
	Employees cannot enter into a borrowing relationship with any other bank or financial institution within Qatar. In cases where mortgages or other such consumer type borrowing relationships already exist, these should be disclosed to the Group Head of Human Resources. Any such new facility may only be taken up after obtaining appropriate approval routed through Human Resources.
	Bounced "Unpaid" cheque
	Working for a bank, employees should ensure that they maintain the required account balance in their accounts at all times. If any cheques issued by the employee, bounce due to inadequate balance, appropriate disciplinary action will be taken by Human Resources.
	Bank's Right to Investigate Assets of Any Employee
	The Bank has the right to engage in any examination it deems necessary, to ascertain the assets of an employee and to seek explanation for any assets that seem unreasonably high considering the resources available to the employee.
2.27	Acknowledgment (Staff)
	I agree to abide by the Masraf Al Rayan Staff Code of Conduct, approved by the Board of Directors and any future amendments communicated, as well as any other relevant legislation and policies, in the performance of my duties. If unsure of an appropriate course of action, I agree to consult with my line manager or the Human Resources.
	Signed:.....
	Name of staff:.....
	Position:.....
	Department/Unit:
	Date:.....

SUPPORTING DOCUMENTATION

Forms and Records Management

Form	Retention Time	Retention Location
Acknowledgment Letter	10 years	HR files
Gift Receipt Acknowledgment	5 years	HR files

Related Material

Name	Location	Folder
Group HR Manual Policy	Policy Register	HR
Group Conflict of Interest Management Policy	Policy Register	Compliance
Group Corporate Governance Framework Policy	Policy Register	Corporate Governance
Group Whistle-Blowing Policy	Policy Register	Compliance
Disclosure and Transparency Policy	Policy Register	Corporate Governance

SECTION 3 - GOVERNANCE

RESPONSIBILITY

Policy Owners:	For Staff Code of Conduct - Group Head of Human Resources
	For Directors Code of Conduct – Company Secretary

VERSION CONTROL AND CHANGE HISTORY

Version Number	Approval Date	Approved by	Amendment
V.0	26 Jan 2022	Board CGNRC	First release Last reviewed as of 16-1-2024. No changes to current version required as per relevant RFA.