

INSTRUCTION CIRCULAR NO:190/2021

18, November, 2021.

**S.P.M. (Revised) Chapter-1**  
**Establishment**

**CODE OF CONDUCT**

The Board of Directors in its 324<sup>th</sup> meeting held on October 11, 2021 has approved the revised and updated Code of Conduct.

Please find attached the same at Annexure "A".



**Dr. Jalil Ahmed Tariq**  
**Divisional Head - ERD**



**Asma Shaikh**  
**SEVP/Group Chief HRMG**

**Copy for information to:**

- The PSO to the President, President's Secretariat, NBP Head Office.
- All Group Chiefs / Divisional Heads at Head Office.
- All General Managers/ Regional Heads / Regional Executives at Regional Offices.
- All Regional Audit Chiefs.
- All Directors, NBP, Staff Colleges / JNMDC.
- All Chief Managers / Branch Managers / Operations Managers / Compliance Officers, domestic and overseas branches.

## CODE OF CONDUCT

### 1.0. Purpose

The Code of Conduct ("the Code") is to define the commitment that the National Bank of Pakistan ("NBP" or "the Bank") expects of its employees to know in clear terms what acts, conducts and practices are considered ethical, and clearly describe the appropriate behaviour that all employees are required to adopt in order to safeguard the reputation enjoyed by the Bank and its subsidiaries, both in Pakistan and abroad. It also describes, where considered necessary, the omissions that would be against the Code.

### 1.1. Application

A copy of the NBP's Code of Conduct will be provided to all concerned so that they know the applicable provisions and undertake to follow these in the course of their employment/ and/or business relationship with the Bank upon induction of employee, return from deputation and updation in the policy or after every five years whichever is earlier.

The rules set out in this Code are to be applied at all times and in all places when carrying out Bank duties, be they of a professional or social nature.

### 1.2. Compliance with this Code

If an employee fails to comply with this Code or applicable laws, rules or regulations (including the rules and regulations of the SBP, where applicable) he or she will be subject to disciplinary measures, including (with respect to employees) discharge from the Bank as per the Bank's Employee Discipline Policy ("EDP"). Violations of this Code may also constitute violations of law and may result in civil or criminal penalties for such person, and such person's supervisors. The competent authority will determine or designate appropriate persons to determine appropriate actions to be taken in the event of a violation of this Code. In determining what action is appropriate in a particular case, the competent authority or its designee will consider the following aspects:

- a. nature and severity of the violation
- b. whether the violation was a single occurrence or repeated occurrences
- c. whether the violation was intentional or inadvertent
- d. whether the individual in question had been advised prior to the violation as to the proper course of action, and
- e. whether or not the individual in question had committed other violations in the past.



### **1.3. Basic Principles**

#### **1.3.1 Act with Honesty and Integrity**

As a member of NBP team, employee may deal regularly with clients, suppliers, auditors, attorneys, colleagues, government officials, competitors and others. Everyone has a right to expect that employee will act with complete honesty, integrity and fairness in all regards. The Bank views these fundamental principles as important. As a financial services organization, whose success in the marketplace depends upon the highest standards of ethical conduct, the Bank views them as especially critical.

For example, when an employee engages the services of others for NBP, such as accountants, attorneys, or other professionals, or when employee purchase supplies or equipment for NBP, his/her choice should be made on the basis of the quality of the service and the competitiveness of the price. Remember that Bank's reputation depends on an employee's exercise of fairness and good judgment.

Employees must ensure that all communications are clear, fair and not misleading.

#### **1.3.2 Comply with the law**

The laws of Pakistan shall always be obeyed by all NBP employees. At no time shall an employee participate in any illegal or corrupt activity or activity that may appear illegal and/ or corrupt, including activities outside Bank functions, and the employee will always comply with the legislation and regulations applicable to the Bank, including but not limited to the Bank's internal policies, as may be amended from time to time and the applicable regulations and directives of the SBP (the "Law"), and where applicable, in accordance with the law of the jurisdiction the employee is stationed at.

- a. Employee will at all times act in compliance with the letter and the spirit of the Law and avoid acts or voluntary omissions that could result in violation of the Law.
- b. NBP's bye-laws, permanent instructions, policies, procedures and other sector codes of professional conduct in effect at the Bank will all be drafted in accordance with the Law. Employees must respect them at all times. Employees who work in certain special sectors of activity are also bound to abide by the rules of conduct specific to their sector.
- c. NBP will to the best of its abilities ensure that all operations, transactions and other actions carried out in foreign country comply with the respective legislation and any other legislation of a country or territory associated with such action. Employees will follow the applicable foreign legislation and will not take any action intended to contravene these laws and regulations. In the event of any conflict between the Law and any applicable



foreign legislation, NBP shall issue special instructions to the relevant employees and take such further action(s) as may be necessary to address any irregularity.

- d. Employees are required to act with the utmost caution when dealing with monies, including foreign public officials.

In the event that there is lack of clarity in respect of legality of a matter, upon receipt of permission from the competent authority, appropriate legal advice may be sought. In such cases, an employee may refer the matter to his/ her supervisor who may bring it to the attention of the relevant officials/ Department(s).

### **1.3.3 Treat others with respect**

The Bank requires objectivity in employee dealings with others and in decision-making. Employee should treat all clients, applicants for employment, colleagues, suppliers and others, kindly, fairly, courteously and respectfully.

### **1.3.4 Non-Discrimination**

NBP will not tolerate discrimination in any form, or any related dishonest, unethical or inappropriate behaviour. NBP's policy is to ensure a harmonious environment with equal employment opportunity for all, regardless of age, gender, race, religion, colour, national origin and marital status. If an employee believes that he/she has experienced any form of harassment or discrimination, he/ she should report it immediately to his/her supervisor/incharge or to HRMG as per the harassment policy.

Supervisors/Incharges are directly responsible for implementing this policy. In addition, employees are expected to maintain a work environment free of any kind of harassment, intimidation and offense as per the harassment policy.

### **1.3.5 Safeguard the confidentiality of information**

Employees are expected to treat information entrusted to them by their clients, contractors, consultants and other NBP employees/ personnel/ officers as they perform their duties for NBP as confidential and privileged. This includes information relating to accounts and loan balances, information concerning the management, financial condition and future plans of the Bank's clients' businesses, employee salary information and information obtained in the course of fiduciary relationships. Employees must not disclose confidential information to anyone either inside or outside NBP who does not have a clearly legitimate need and right to know the information. Any disclosure of information about a client to unauthorized individuals constitutes a violation of this policy.

Duty of confidentiality involves not divulging information to third parties other than in the following circumstances:



- i. express permission has been given by the person/ entity sharing the information,
- ii. where the Bank is legally compelled to do so,
- iii. where there is duty to the public to disclose, and
- iv. it's necessary for the Bank to present its case e.g. in court or other circumstances of a related nature.

Confidentially applies whether the information has been obtained from those with whom the Bank does business or from a source within the Bank. Such information should be used for the intended purpose only.

All employees must sign a declaration of confidentiality/ secrecy upon induction of employee, return from deputation and updation in the policy or after every five years whichever is earlier and must comply with the procedures and regulation in place within the Bank. This policy is designed to manage and segregate confidential information and to prevent its inadvertent spread and misuse.

An employee must not remove any documents containing confidential information from office/ Bank premises unless prior approval has been sought from his/ her immediate supervisor.

#### **1.4. Disclosure of Information/Transactions (STRs/CTRs) to Outsiders**

The employees of the Bank are strictly prohibited to disclose the fact to any customer or any other quarter that a suspicious transaction or related information is being or has been reported to any authority, except if required by law.

Employees should at all times act in compliance with the relevant laws, including anti money laundering laws, as may be amended from time to time, including prohibition of alerting a client or potential client (or any party involved in the transaction) to the fact that the Bank is investigating their actions or motives, or to tell them, or any other outside party, that a report of activity identified as suspicious has been prepared and/or filed. The same also applies for the Currency Transaction Reporting (CTR) to Financial Monitoring Unit.

When a possibly suspicious activity or potential legal or regulatory violation is observed, the employee is responsible for calling the situation to the attention of his/her supervisor, who will notify the competent authority.

Employees are required to treat information concerning NBP or any of its clients as confidential. Confidential information obtained as a result of employment with NBP may not be used for the purpose of furthering any private interest or as a means of generating any personal gain or the personal gain of his/her family, friends, or others. The use or disclosure of such information may result in civil or criminal sanctions.



If an employee is required to provide any information to a regulator or is required to make any necessary visit to a regulator, such matter should immediately be brought to the attention of his/her supervisor. While handling matters with a regulator, an employee must ensure that any authorised information/ data shared is accurate, does not furnish/ omit any information/ data that might result in the information provided being misleading, be provided only after all reasonable enquiries are made to ascertain the accuracy and completeness of the information/ data and that all such information/ data has been reviewed and approved by the competent authority.

#### **1.5. Limited Use of Confidential Information**

While recognizing the need for a constant flow of information for the smooth operation of NBP, employees are expected that they will not disclose confidential information pertaining to their clients' affairs to anyone unless they have a clear business need to know the information for the performance of their duties. Employees must exercise particular care in communicating confidential information to persons in other teams of NBP who may have different responsibilities or conflicting obligations.

No employee shall divulge any information relating to the affairs of the Bank's customers except in circumstances in which it is, in accordance with law, practice and usage customary among bankers, necessary or appropriate to divulge such information.

#### **1.6. Avoid conflicts of interest**

As part of employment responsibilities, employees are expected to act in a way that contributes to the financial success of NBP, enhances its reputation and fosters its client relationships. This requires an employee to look after his/her own private financial interests in such a way that they do not profit improperly from their position with NBP.

As a member of a financial institution employee must manage their personal, financial and business affairs to avoid conflicts of interest, or even the appearance of any conflict of interest, with the performance of their responsibilities and duties to NBP. When a conflict of interest, or potential conflict of interest, does confront employee in the performance of his/her job, employee must immediately disclose its existence to his/her manager/ supervisor and, in case an employee is performing Audit function, he/she must also immediately disclose its existence to the immediate supervisor as well, fully describing the facts giving rise to the conflict or potential conflict, and excuse him/herself from any decision made with respect to the transaction.

Conflict of interest rules apply to all transactions made, directly or indirectly, for employees own account or for the account of his/her immediate family or other family members. Employees immediate family consists of spouse and the children, parents and siblings of employee and his/her spouse, whether by blood, marriage, adoption or operation of statutory or common law. Employee may also have a legal liability if someone outside his/her immediate family or other



family members of obtains a personal gain or advantage on the basis of confidential information they have obtained directly or indirectly from employee.

### **1.7. Use of NBP's Computer Systems**

Utilization of NBP's computer systems provides an employee access to confidential client information based on the business/support function(s) being performed. Employees are granted access to the various computer systems to perform their duties. Each employee is expected to protect the access granted to him or her and to keep any associated passwords confidential at all times. In addition, each employee must only utilize software that has been acquired through proper channels and installed properly by or under the supervision of a technical manager. Unauthorized use of the computer programs or software that has been acquired or used by NBP, including, but not limited to, accessing inappropriate websites, using email in a manner that may be construed by others as improper or offensive or against any of the policies of the Bank, or disclosing the program or software to, or permitting the use of such program or software by, any other employee or a third party without appropriate authorization, will not be tolerated. Computer usage will be monitored to ensure compliance with NBP's IT Security Policy.

### **1.8. External Communications**

Only designated Senior Management Officials liaisons through Corporate Communication Wing are responsible for NBP's relationship and communication with the press and the general public.

Discussions of NBP's structure, financial performance, products and services and position on issues that an employee may wish to share with those outside of NBP are contained in publicly available publications such as bank's annual and interim reports, press releases, published speeches and statements and marketing brochures. Employee may request brochures or marketing pieces from the Marketing Team and share them with any external audience. Should employee receive any inquiries about NBP from any external source, including but not limited to the media, he/she must not offer comment, except to state that the inquiry may be referred to the Corporate Communications Wing.

Social Media interactions / communications by employees will be governed by NBP Social Media Policy.

All proposed public statements or press interviews must be reviewed in advance with Senior Management/Corporate Communication Wing. In addition, employee must have written approval, secured from the President/CEO of Bank, before giving speeches or publishing written materials, fiction or non-fiction, on subjects related to NBP or its business.

Some non-public information about NBP, its organization, systems and procedures may be considered confidential or proprietary and is therefore inappropriate for external circulation. If

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employee have any questions about whether certain information is public or private, check with Senior Management before disclosing it to anyone outside NBP.

All authorised employees are required to respond accurately, completely and promptly to all valid requests for information from government/ regulatory agencies and authorities. Employees must immediately inform the concerned department of any requests by governmental agencies/ authorities that indicate risks for the organization, or that are unusual or outside the normal scope of the employee's responsibilities.

### **1.9. Employee Information**

All credit and personnel inquiries, such as an employee's complete name, job title and length of service, must be referred to HRMG, and information concerning an employee will be released only with the consent of the competent authority or when legally required. NBP's policy is not to give Employment References other than to provide the employee's complete name, job title, work conduct and length of service.

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### **1.10. Sincerity with NBP /Management and Others**

No organisation is free from mistakes and sensitive situations may occasionally arise. When employees have knowledge of any questionable or possible illegal act or occurrence involving or affecting NBP, they have an obligation to report the act or occurrence using means made available by the Bank for such purpose. Care should be taken to ensure that only factual events are reported. Any wilful misuse of this facility will be treated as gross mis-conduct and the employee may be subjected to disciplinary action as per the EDP.

Employees are expected to fully cooperate with internal and independent auditors and counsel in the performance of their designated duties. This means providing them with complete and accurate information at all times. Employees shall ensure compliance with applicable accounting principles and the Bank's internal accounting controls at all times.

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### **1.11. Self-Dealing**

Employees are not in any way to represent or exercise any authority on NBP's behalf, grant direct or indirect credit accommodations or make credit recommendations, or act in the capacity of an account officer with respect to any type of transaction for him/herself, members of his/her immediate family, and any other family members, any individual or organization which has granted to employee, a member of his/her immediate family or any other member of employee's family who shares with employee the same residence a power-of-attorney, or with any other persons, corporations, partnerships, trusts or other organizations in which the employee, any member of his/her immediate family or any other family member who resides with employee is a fiduciary, an officer, an authorized signer or have a material financial interest.





Employees are not to act, without prior written approval of the immediate supervisor, as:

- a. An agent, deputy or attorney in fact on any account of another at NBP. Any application to the immediate supervisor to so act will only be considered based upon employee's close, personal relationship with the accountholder;
- b. An executor, administrator, trustee, guardian, custodian or in any other fiduciary capacity on any account of another at NBP. Any application to the immediate supervisor to so act will only be considered based upon employee's close, personal relationship with the estate person or persons for whom he/she is acting as fiduciary; or
- c. An official of any organization with the following exceptions: residential cooperative or condominium apartment boards where employee live, social, religious, philanthropic or civic organizations, fraternal organizations, neighbourhood associations, clubs, colleges or schools or trade or professional organization associated with the financial services industry or employee's profession. However, registered representatives must notify to the Chief Compliance Officer/Group Chief Compliance in writing via e-mail prior to assuming any such role.

Requests for approval should be submitted in writing to the immediate supervisor. In all cases where approval is granted, employee must disclose to the principal, beneficiary, trust or, court or other third party as the case may be, that he/she is so functioning solely because of the close personal relationship, and that he/she is in no way acting as a representative or agent of NBP.

#### **1.12. Respect the Policies of the organization**

Employees are required to be aware of all policies and processes which apply to them as an employee of NBP. These policies and processes are issued by the authorized officials of NBP and modifications may be enforced from time to time. In case of any doubt regarding any applicable policies and/or processes, employee may seek clarification from his/her immediate superior or from the HRMG. Any wilful disregard for approved policies and processes will be treated as misconduct.

#### **1.13. Demonstrate Discipline and Decency**

##### **1.13.1 Timeliness**

NBP expects that employees devote their full attention and energy to official duties during working hours. Employees are required to attend at work as required and not to absent themselves from duty without authorization.



### **1.13.2 Punctuality**

Every employee must demonstrate regularity in attendance and punctuality. Employees are required to attend to their official duties with due regard for office timings and office discipline as notified by State Bank of Pakistan. Breaks allowed as per NBP rules for lunch and prayers, and for any other purpose, where applicable, should be adhered so that these are not unduly extending beyond permissible limits. Habitual late-comings and absence from duty station will not be tolerated, and any employee found to be guilty of such behaviour may be subjected to disciplinary action. Some allowance may be made, on a case to case basis by the immediate superior/ Head of Department of the employee concerned in case of any hardships faced by any employee, and in all such cases, the onus will be on the employee to submit details of hardships to the superior on a timely basis, and to obtain his/her approval, which should be based solely on the merits of the case and at the sole discretion of the Head of Department.

### **1.14. Dress Code**

The Bank expects all employees to be appropriately dressed when presenting themselves for work.

Employees are required to maintain proper dress code (office attire as may be prescribed by NBP Management from time to time) and appear well groomed & presentable all the times. Cleanliness and personal hygiene should also be given due importance while attending work. Non-Management staff should be in their proper uniforms during office hours.

### **1.15. Acceptance of Gifts from Suppliers or Clients**

NBP employees are prohibited from giving, seeking or accepting unauthorised gifts for oneself or any other person anything of value (including services, discounts or entertainment) from clients, suppliers or anyone else in return for any business or service from, or confidential information about, NBP. There are certain exceptions to the general prohibition against giving, seeking or accepting anything of value as follows:

- a. Lunches, dinners and other customary entertainment (e.g., sports events, golf, theatre, etc.) provided in the ordinary course of a supplier's or client's business and in situations where the Bank would normally reimburse the cost as a proper business expense;
- b. Nominal services or discounts customarily afforded by suppliers or clients in the ordinary course of their business; and

Employees must report anything of value beyond those items listed above if offered to them, received by them or anticipate receiving promptly to the Immediate Supervisor for appropriate action including the return of the gift forthwith to the provider. Penalties including fines and imprisonment may be imposed for violations as per the EDP.



An employee found to be receiving, accepting or condoning a bribe, kickback, or other unlawful payment, or attempting to initiate such activities, will be subject to disciplinary action and possible criminal proceedings against them.

#### **1.16. Borrowing Money from Vendors or Clients**

Employees are not allowed to borrow money from, or lend money to, any of NBP's vendors or clients. This is strictly prohibited. Employees may, however, receive credit on customary terms in connection with the purchase or lease of goods and services from a commercial establishment that is a vendor or client of NBP. Loans made to officers and employees by other financial institutions that are vendors or clients of NBP, in the course of their business, are allowed.

#### **1.17. Political Affiliation**

During their employment, employees or their dependents shall not accept and hold any political position/ post or actively get involved in any political activity. Any political views if expressed by an employee are his/ her own views and the Bank does not hold any responsibility in such matter.

No employee shall become a member of any banned group/ organization/ party during his/ her employment.

Employees are not permitted to canvass or engage in any political or religious discussion, activities or lobbying at the Bank premises or during banking hours.

No employee shall work on a political fundraiser or other campaign activity without disclosing the same to competent authority and shall not use any assets of the Bank for any unauthorized activities.

If an employee breaches the above code, the Bank shall be entitled to terminate his/ her employment with immediate effect.

#### **1.18. Parallel Service**

During the term of an employee's employment with the Bank, an employee must not serve or be employed with any other organization in any capacity whatsoever, unless acceded to by the Bank. The employee will be required to disclose and obtain approval from HRMG in case of any engagement in family business.

If the Bank discovers at any time that an employee is or was rendering services to or is currently employed by another organization, without authorization during their employment with the Bank, that employee's services at the Bank will be terminated immediately.



**1.19. Data Reporting**

No employee shall submit or approve any report or other document where the person knows or suspects that any portion of the report is not accurate, is untruthful, or is not in compliance with the Bank's policies.

**1.20. Fraud/ Theft**

Any employee found to be engaged in, attempting to, or conspiring as to fraud or theft of assets of the Bank or its clients, or attempting to engage in fraud or theft, may be subject to immediate dismissal and criminal prosecution, subject to the rules, regulations or law applicable thereto. All employees have a responsibility to report any actual, attempted, or conspiracy as to fraud or theft.

**1.21. Declaration of Secrecy**

Every employee shall, before joining service, sign a Declaration of secrecy

**1.22. Employee not to leave station**

No employee shall absent himself from his duties, nor leave his station overnight, without having first obtained, the permission of the competent authority.

**1.23. Representation to Directors and Members**

No employee shall make any personal representations to Directors, Government or any outside authority. Such representations must be addressed to the President through the immediate officer, if any, of the employee.

**1.24. Technology Usage**

No employee shall be allowed:

- a. To download/delete any software/data on the Bank's computer system unless it has been screened by the Bank's security system/management.
- b. To access unauthorized data or websites through Bank's internet facility.
- c. To transmit official data to other than Bank's users, unless permitted by the competent authority.
- d. To copy, electronically or otherwise, any document of the Bank or to transmit it by any means (e.g. email, WhatsApp) it except with the approval of the immediate superior.

- e. To record, audio or video, any meeting or conversation during office hours except with the approval of his immediate supervisor

## **1.25. Restrictions on borrowings**

### **1.25.1 Employees in debt**

Except with the permission of the competent authority, no employee shall incur an unsecured debt to an extent exceeding his emoluments of four months. Every employee incurring unsecured liabilities in excess of four months' emoluments shall submit a statement of his financial position to the President on the 31st December each year until the loan is repaid. The statement shall indicate the steps taken by the employee to liquidate the liability.

## **1.26. Speculating in stocks, shares, giving of guarantee etc.**

No employee shall:

- i. borrow money from or in any way place himself under pecuniary obligation to a broker or money lender or a subordinate employee of the Bank or any firm or person having dealings with the Bank;
- ii. buy or sell any other stock, shares or securities of any description without funds to meet the full costs in the case of purchase or script for delivery in the case of sale;
- iii. book debts at a race meeting;
- iv. lend money in his private capacity to a constituent of the Bank or have personal dealings with a constituent in the purchase or sale of bills of exchange, Government paper or any other securities;
- v. except with the permission of the competent authority, guarantee in his private capacity the pecuniary obligations of another person or agree to indemnify in such capacity another person from loss;
- vi. act as agent for an insurance company otherwise than as agent for or on behalf of the Bank;
- vii. be connected with the formation or management of a joint stock company;
- viii. engage in any other commercial business or pursuit either on his own account or as agent for another or others;

- ix. Accept, or seek any outside employment or office, whether stipendiary or honorary, without the previous sanction of the authorized person;
- x. Undertake part time work, honorary or volunteer for a private or public body or private person, or accept fee therefrom, without prior approval of the authorized person and such authority may, in case where it thinks fit to grant such approval, stipulate that any fees received by the employee for undertaking the work shall be paid in whole or in part to the Bank;
- xi. Approve loan for any relative through blood or marriage;

### **1.27. Money Laundering**

Employees must report suspicious activities such as suspected insider trading, fraud, misappropriation of funds and money laundering through proper channels to Compliance Officer of the Bank

Employees shall ensure to abide by following key principles:

- a. The identity of a customer beginning a business relationship or conducting a single transaction should be established from official or other reliable identifying documents. The Golden Rule is to Know Your Customer.
- b. Business units must keep records of customer identification for at least five years after the account is closed and of transactions for at least five years after their completion, or longer if the local law requires. These documents should be available to the competent authorities in the context of relevant criminal investigations and prosecutions.
- c. If business units suspect that funds from money laundering, they should promptly report those suspicions to the competent authorities and record the circumstances in writing.
- d. Business units should not warn their customers when information relating to them is being reported to the competent authorities.
- e. When a business unit reports its suspicions to the competent authorities, it should comply with their instructions.

### **1.28. Acts of Misconduct**

The following shall be treated as acts of misconduct:

- a. Willful insubordination or disobedience, whether alone or in combination with others, to any lawful and reasonable order of a superior;



- b. Theft, fraud, dishonesty, misappropriation or embezzlement in connection with the employers' business or property;
- c. Misrepresentation or submission of fake documents for availing loan facility;
- d. Willful damage to or loss of employers goods or property;
- e. Taking or giving bribes or any illegal gratification;
- f. Habitual absence without leave or absence without leave for more than 10 days;
- g. Habitual late attendance;
- h. Habitual breach of any law applicable to the Bank;
- i. Riotous or disorderly behavior working hours at the establishment, or any act subversive of discipline;
- j. Habitual negligence or neglect of the work;
- k. An act of gross negligence;
- l. Striking work or inciting others to strike in contravention of the provisions of any law, or rule having the force of law;
- m. Go slow;
- n. Frequent disregard or disobedience of rules or general orders;
- o. Frequently making false and misleading statement;
- p. Inefficient, dilatory, careless or wasteful working;
- q. Malingering;
- r. Use or being under the influence of alcohol or drugs at workplace.
- s. Interaction with media except when permitted by the Bank/authorized person.
- t. Concealment of facts/factual position, information (personal or Banks) from or misrepresenting facts before Management.
- u. Making commitments on behalf of the Bank beyond the scope of the delegated Authority.
- v. Making commitments known to be detrimental to the interest of the Bank
- w. Engaging in any business and any conflict of interest including but not limited to family business, etc. [and should declare immediate family member's Business as well]
- x. Engaging directly or indirectly, without the Bank's permission in any other business or occupation, whether stipendiary or honorary whilst in service of the Bank.
- y. Divulging of confidential information or other secret/private matters including but not limited to Bank's secrets, customer data & information, product papers, manuals, policies, etc. which are likely to adversely affect the Bank or impact business.
- z. Insider Trading (transactions made on basis of privileged information, particularly trading in Bank's stock and shares)
- aa. Parallel banking (any activity by an individual that he/she carries out in personal capacity, with Bank's customer or anyone else which he/she actually should have performed on behalf of the Bank).
- bb. Involvement in Money laundering or Terrorist Financing / transactions either through his/her own account or on behalf of any Bank customer, where due diligence was not exercised as required by AML / CFT Policy.
- cc. Use of unfair means in respect of clearing the Banking Diploma Examination or any other examinations.
- dd. Submission of fake, fabricated and false documents (including loan) / testimonials such as Medical Bills, Birth Certificate, Degrees and other such Documents/Certificates.



- ee. Repetition of misconduct after issuance of two (2) consecutive warning letters in a calendar year may render concerned staff to Disciplinary Action.
- ff. All types of discrimination and harassment (based on age, gender, religion, race, nationality, place of domicile, marital status, disability etc.).
- gg. Unauthorized use of Bank's property
- hh. Failure to disclose a personal interest conflicting with any banking transaction.
  - ii. Tampering record.
- jj. Maliciously raising a concern that is untrue, baseless and / or false through Whistle blowing
- kk. Participation in Political activity
  - ll. Taking part in any election to a legislative body, whether in Pakistan or elsewhere. An employee who is qualified to vote at such election may exercise the right to vote, but if he/she does so, he/she shall maintain secrecy of his/her ballot.
- mm. Bringing or attempting to bring political or other outside pressure/influence directly or indirectly to bear on the authorities/superior officers or indulge in derogatory pamphleteering, contribute articles, or write letters to the newspapers, anonymously or in his/her own name with an intent to induce the authority/superior officers or to act in a manner inconsistent with policies, procedures, rules, in respect of any matter relating to the appointment, promotion, transfer, punishment, retirement or for any other condition of service of employment.
- nn. Physical altercation within the Bank premises
- oo. Any improper conduct

**DECLARATION OF CODE OF CONDUCT COMPLIANCE**

**I, the undersigned hereby confirm having read and fully understood the contents and agree to abide by the "NBP Code of Conduct" issued by the Management of the Bank.**

Employees' Name:
PF / Employee Number:
Place of Posting
Date:

**Employees' Signature**

**2.0. Policy Implementation**

Pursuant to the National Bank of Pakistan Byelaws, 2015, the Board of Directors of the Bank shall have the power to manage, issue general direction and carry out superintendence of the affairs and the business of the Bank, including those relating to this policy. The enforcement of this policy shall be subject to the approval of the Board.





The terms of this policy are consistent with the relevant provisions of the NBP Staff Services Rules, 2021 and are to be read in conjunction with the provisions thereof. Unless specified otherwise, this policy supersedes all previous circulars, notifications and/ or relevant directions on the subject.

This policy has been formulated to update and collate relevant provisions relating to the subject matter and therefore shall remain binding and enforceable. In the event of any contradiction between this policy and another existing policy, the provisions of the specific policy shall prevail of the provisions of the general policy and shall be subject to the final decision of the senior management of the Bank.

The terms of employment of an employee shall be governed in accordance with the relevant applicable policies of the Bank, as may be amended from time to time

**2.1. Effective Date of Policy Implementation**

This Code of Conduct will come into force with immediate effect.

**2.2. Revision of Policy**

This Code of Conduct will be reviewed after 03 years from the date it comes into force.

**2.3. Approval**

The Code of Conduct has been approved by the Board of Directors in its 324<sup>th</sup> meeting held on October 11, 2021.

