



**HEAD OFFICE
HUMAN RESOURCES DEPARTMENT
INDUSTRIAL RELATIONS DIVISION**

Code of Conduct & Ethics and Conflict of Interest Recognition & Management Policy

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Code of Conduct & Ethics and Conflict of Interest Recognition & Management Policy

1. Preamble

- 1.1 Bank of India is committed to conduct its business in accordance with the highest ethical standards, in order to merit and maintain the complete confidence and trust of all our stakeholders - customers, investors, staff members, communities, public and others we deal with.
- 1.2 The employees of the Bank are expected to conduct their personal affairs and manage their business transactions in a manner that does not result in adverse comments or criticism from its stakeholders, or in any way damage the Bank's reputation as a responsible financial services organization. The laid down quality policy of Bank of India envisages its commitment to becoming the 'Bank of Choice' by providing superior, pro-active, innovative and state-of-the-art Banking services with an attitude of care and concern for the customers and its patrons.
- 1.3 This policy titled as 'Bank of India Code of Conduct & Ethics and Conflict of Interest Recognition & Management Policy' (henceforth to be referred to as the Code) addresses both business and social relationships, which may present legal and ethical concerns, and also sets forth a Code of Conduct to guide all the staff members. It articulates the boundaries of behavior as well as expectations for behaviour. When each employee clearly knows the ethical standards of the Bank, they are more likely to recognize wrongdoing. Miscreants are often hesitant to commit an unethical act if they believe that everyone else around them knows it is wrong. Good ethics code focus employees on actions that result in doing the right things for the right reasons.

2. Philosophy of the Code

- 2.1 The philosophy behind introducing this Code is to make ethical behavior a habit whereby employees continuously test their actions against expected standards. Repeated over time this kind of habit becomes inculcated in the individual and ingrained in the culture of an organization.
- 2.2 The Code attempts to set forth and reinforce right conduct and behaviour to be followed steadfastly and in the process dissuade a culture of misconduct normally associated with wilful disregard of laws, regulations and governance policies/processes/procedures. It reflects Bank's commitment to integrity and the highest standards of ethical practices.
- 2.3 The Code is intended to serve as the charter for day -to-day work to enable employees to make the right decisions while performing their roles and responsibilities across various functions in the Bank and, therefore, serve to underline the fundamental commitment to compliance with regulatory guidelines and laws of the land and the basic parameters of ethical behaviour.
- 2.4 This Code attempts to set forth the guiding principles on which the Bank shall operate and conduct its daily business with its multitudinous stakeholders, government and regulatory agencies, media and anyone else with whom it is connected. It recognizes that the Bank is a trustee and custodian of public money and in order to fulfill its fiduciary obligations and responsibilities, it has to maintain and continue to enjoy the trust and confidence of public at large.

3. General Nature, Applicability & Administration of the Code

- 3.1 The Code is applicable to all the Bank employees and Directors. Even probationers, consultants, agents, third party whose services Bank has solicited, will also undertake to comply with the Code as part of their business relationship with the Bank. The Code shall come into force with effect from the date of approval by the Board of Directors of Bank of India.
- 3.2 If any part of this Code conflicts with applicable law, the law will prevail. If any part of this Code is deemed invalid, the validity and enforceability of its other parts & provisions shall not be affected. The Bank reserves the right to interpret the Code at its sole discretion. The guidelines, policies and rules mentioned in this Code and their content may be amended or modified from time to time, in the normal course of business, as deemed necessary and appropriate.
- 3.3 The rules of conduct set out in the Code are not exhaustive; they serve to complete the corporate guidelines, policies, permanent instructions, procedures and other standards governing our conduct and with which we must comply at all times.
- 3.4 The Code does not replace other provisions and obligations otherwise applicable under the law.
- 3.5 The rules set out in this Code are the same for everyone, and apply at all times and in any location when carrying out Bank's duties, be they of a professional or social nature.

4. Administration of the Code & Bank's Responsibility

- 4.1 It is the responsibility of each Director and Staff Member to be familiar with the Code. The supervising staff are expected to make every reasonable effort to ensure that their subordinate staffs continue to comply with the provisions of the Code.
- 4.2 Senior management shall implement the Code, and determine matters of interpretation. Monitoring of adherence to the Code shall be accomplished by audit, examination, and human resource procedures.
- 4.3 Staff members are encouraged to seek the advice of the appropriate supervisor regarding questions of interpretation, and of the applicability of the provisions of the Code to a particular situation.
- 4.4 Any violation or suspected violation of this Code may warrant appropriate corrective action including disciplinary action under Bank of India Officer Employees' (Discipline & Appeal) Regulations, 1976 & Bipartite Settlement dated 11.11.2020 amended up to date.
- 4.5 It is the responsibility of the Bank to ensure that all employees are made aware of the Code. The Bank shall ensure availability of adequate resources and support to promote better understanding of the Code. Any changes to the Code will be circulated to all employees in a timely manner.

5. Observance of the Code

All Employees are required to affirm their having read and understood the Code and confirm to abide by it by signing a Declaration (Annexure I), to be submitted through HRMS, which shall be deemed to be binding on the signee.

6. Waivers of the Code

If under certain exceptional circumstances, it becomes appropriate to grant a waiver of a provision of the Code, it must be made in writing and receive the prior consent of the Board of Directors of the Bank. Any such waiver must be promptly disclosed via Bank's website or other expeditious and efficient method that is in accordance with legal and regulatory requirements.

7. Interpretation of the Code

In case of any questions or clarifications, the General Manager (HR) will be the competent authority to clarify / interpret the same.

8. Purpose of the Code

- 8.1 To promote a consistent understanding of, and approach to, the standards of ethical behaviour, including the ethical approach to actual or apparent conflicts of interests between personal and professional relationships;
- 8.2 To raise awareness of acceptable and unacceptable behaviour, and through this endeavour to avoid any real or perceived misconduct;
- 8.3 To promote prompt internal reporting of violations and suspected violations;
- 8.4 To uphold the credibility of our organisation through inculcation of the most desirable conduct and the highest ethics into the culture of our organisation.
- 8.5 To build a strong and adequate internal process and governance and reinforce the right conduct and behaviour amongst the employees to avert a culture of misconduct which is normally associated with wilful disregard of laws, regulations and governance policies/processes/procedures.
- 8.6 To have an internally strong and uncompromising vigilance mechanism which would give the requisite comfort to external agencies that our Bank meets the requisite standards to safeguard public interest.
- 8.7 To reinforce an independent internal ombudsman mechanism within the Bank to resolve customer complaints.
- 8.8 To foster and maintain a sound ethical culture wherein employees feel comfortable speaking up and voicing their concerns, and they trust their colleagues will do the same.
- 8.9 To have a leadership which will set a tone that inspires trust in their own ethics and in their willingness to hear and respond to concerns.
- 8.10 To remove fear of retaliation which acts as a big deterrent for reporting misconduct, and thus, prevents ethical cultures from thriving.
- 8.11 To foster a broader approach which goes beyond the rules, whereby all kinds of misconduct risks can be proactively searched.
- 8.12 To clearly define acceptable and unacceptable behaviours linked in particular to financial misreporting and misconduct, economic/financial crime, including fraud, money laundering and anti-trust practices, bribery, corruption, market manipulation, mis-selling and other violations of consumer protection laws;
- 8.13 To clarify that in addition to compliance with legal, regulatory requirements and internal policies, everyone in the organisation is expected to conduct themselves with honesty and integrity and perform their duties with due skill, care and diligence;

- 8.14 To ensure that all are aware of the potential internal and external disciplinary actions, legal actions and sanctions that may follow unacceptable behaviours.
- 8.15 To articulate practices, internal controls and compliance mechanisms that are conducive to limiting the opportunities for misconduct.

9. CONFLICTS OF INTEREST

- 9.1 Conflict of interest implies a situation of conflict between the duty of a person and private interests of an individual, which could improperly influence the performance of his/ her duties and responsibilities. Conduct & ethics are liable to get challenged when there are instances of conflicts of interests.
- 9.2 Examples of situations which may arise due to conflicts of interest :
 - 9.2.1 Where bank extends loans to a firm while its proprietary trading function buys and sells securities issued by that firm;
 - 9.2.2 Where bank enters into a business relationship with an entity in which one of the Bank's Board members has a financial interest;
 - 9.2.3 Where the bank is part of a group, reporting lines and information flows between the banks, its parent entity and/or other subsidiaries can lead to the emergence of conflicts of interest (e.g. sharing of potential proprietary, confidential or otherwise sensitive information from different entities or pressure to conduct business on a non-arm's length basis).

10. Purpose of Conflict of Interest Recognition and its Management Policy

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

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

11.1 General adherence to applicable laws and regulations

- 11.1.1 We must be familiar and comply with all applicable laws, regulations, rules and regulatory orders governing our activities. Any inadvertent non-compliance, if detected, must be immediately reported to the competent authorities.
- 11.1.2 We must not, at any time, participate directly or indirectly in activities that are illegal or could be perceived as such, even outside our duties.
- 11.1.3 Any suspicious activity must be reported to the competent authority promptly.
- 11.1.4 When performing our duties, we must immediately disclose to the competent authority if we are the subject of an inquiry, proceedings, lawsuits or convictions, regardless of its type, and that could be connected to our function.

11.2 Effective & desirable communication

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

11.3 Dealings with the customers

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

11.4 Disclosures

To make full, fair, accurate, sensible, timely and meaningful disclosures in the periodic reports required to be filed by the Bank with government and regulatory agencies.

11.5 Healthy and safe work environment

- 11.5.1 To be committed to providing a healthy and safe work environment and complying with all applicable legislations. We are responsible for making decisions that will prevent risks and ensure our own health and safety as well as that of others in

accordance with the workplace health and safety guidelines. While carrying out our duties, whether on Bank premises or elsewhere, we must not take or be under the influence of any kind of drugs or alcohol. Employees are urged to continue compliance with the Non-Smoking policy in offices and also in other public places as required under the law.

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

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

11.6 Conflict of Interest

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

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

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

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

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

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

11.6.3.4 We must not engage in any commercial activity with a customer or third party unless we have the prior authorization of the competent authority.

11.6.3.5 We have certain privileges as Bank employees. However, we cannot have someone else benefit directly or indirectly from the advantages and privileges awarded to us as Bank employees, other than those authorized by the banking advantages for employees and retirees.

11.6.3.6 We must carry out our personal transactions and those of our family members as if they or we were regular customers.

11.6.3.7 We must not grant loans to ourselves or members of our family or a company in which we or a member of our families have a stake.

11.6.3.8 We must not accept any gift, service or perk which might influence our work or decisions. We must not solicit nor encourage giving of gifts or entertainment by an existing or potential customer, consultant or any third party, except if such solicitation is done on behalf of a charitable organization. In such cases, 100% of the net benefits must be remitted to the charitable organization on whose behalf the solicitation was made.

- 11.6.3.9 Our loyalty to the Bank governs our behavior and we must ensure that the assets and property safeguarded or under the control of the organization are preserved.
- 11.6.3.10 We must not work for our own business or for that of a third party during business hours. We must also minimize activities unrelated to our work such as checking social networks like Facebook or Instagram.
- 11.6.3.11 We must abstain from making comments that could tarnish the Bank's image or reputation with customers, employees or the general public. We must avoid mentioning the organization when we express personal opinions. This obligation continues to apply after our employment has ended. Both at work and in our personal activities, we must avoid participating, directly or indirectly, in activities that could compromise the organization's interests, image or reputation.
- 11.6.3.12 We must use the organization's name, trademark and any other form of its intellectual property exclusively for business purposes in accordance with the applicable standards in this regard. If, as part of our duties, or while using the organization's equipment, we develop processes, programs or any other intellectual property, the Bank will be the owner of such property from the onset.
- 11.6.3.13 We must extend fullest cooperation in investigations, requests for information and audits, regardless of whether they are internal or external.
- 11.6.3.14 Communications with the media must only be made by persons authorized to represent the Bank in dealings with the media in accordance with guidelines in force in the organization.
- 11.6.3.15 We must safeguard organization's assets against any type of inappropriate use. These assets include cash and marketable securities, offices, supplies and equipment, systems and technological resources. We must not use the equipment or resources of the organization, including the services of its employees, other than for the needs of our duties, except insofar as this use is reasonable and in accordance with the organization's corporate guidelines and policies. In such a case, we must obtain proper authorization in advance
- 11.6.3.16 Any expenses that we may incur for and on behalf of the Bank must be reasonable, relevant and in compliance to applicable policies of the Bank. The manner in which customers are entertained must comply with the fundamental principles of the Code and be mindful of maintaining our image and reputation.
- 11.6.3.17 The Bank must not be associated with any school of thought or political party line. However, we may, on a personal level, participate or contribute to political activities. We must not carry out political activities on work premises or use the time and resources of the organization for such activities. No donations to political parties or candidates may be made with or reimbursed from Bank funds.
- 11.6.3.18 Any close or romantic involvement with another employee of the Bank, supplier, third party might affect an employee's ability to exercise good judgment on behalf of the Bank, leading to conflict of interest. Such a situation must be reported to the competent authority to enable adoption of corrective measures.

12. Honest and ethical conduct

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

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

- 13.1 We must maintain the highest level of confidentiality and fair dealing within and outside the Bank.
- 13.2 We must diligently and consistently respect the confidentiality of information acquired in the course of employment. Employees must take all reasonable measures to protect the confidentiality of non- public information about the Bank and its customers and other third parties obtained or created in the course of employment and to prevent the unauthorized disclosure or misuse of such information.
- 13.3 We must ensure that confidential information acquired in the course of employment is only used in the proper performance of their duties and not used for personal advantage or disseminated to the public and other third parties either during or after employment without Company approval.
- 13.4 No one must post any confidential or strategic information on social networks.
- 13.5 Employees may access Bank's systems and confidential information only if truly needed to perform official duties. Employees must act within the ambit of security and confidentiality guidelines of the Bank while carrying out their duties.
- 13.6 Any event which may pose threat to Bank's security and jeopardize the protection of confidentiality must be reported to the competent authority without any delay.
- 13.7 We must safeguard the confidentiality of information about our customers and employees.
- 13.8 We must be vigilant about cyber security risks and information theft and report any that could jeopardize the confidentiality of information.
- 13.9 We must consistently adopt secure and responsible practices and be familiar and comply with all information security guidelines.
- 13.10 All employees must remain vigilant about phishing attempts, fraudulent calls or suspicious behavior and report without delay any suspicious behaviour by email, phone, text or in person.
- 13.11 We must safeguard our portable equipments (laptop and smartphone) against loss or theft at anytime and anywhere. It is essential to report immediately any loss or theft of equipment.
- 13.12 We must be cautious while transmitting confidential information only to individuals who need it as part of their official duties. Not to use information about customers and employees for personal gain or maliciously. Not to share our passwords or user codes and protect them adequately.
- 13.13 All employees must follow secure destruction procedures once information we possess are no longer required.
- 13.14 We must strictly follow the guidelines of not posting confidential or strategic information on social networks. To safely store any document containing confidential information under lock and key.

- 13.15 Since all information circulated on the organization's electronic networks belongs to the organization, we must ensure the following:
- 13.15.1 During work hours, the electronic networks are used to carry out our duties.
 - 13.15.2 The confidential information transmitted via electronic networks complies with the security guidelines in effect. If emails are sent outside our networks, the contents of the emails must be secured.
 - 13.15.3 Only our official email address is to be used to handle, send or receive confidential or professional information. No information belonging to the Bank, customers or employees should be stored on external sites (e.g., Dropbox, Amazon Drive, Google Drive) that are not authorized by the Bank.
- 13.16 We must deal fairly without any discrimination and with honour with Bank's customers, competitors, co-employees, suppliers and other business associates as well as public authorities.
- 13.17 No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice such as bribe or other illegal gratification, which may cause disrepute or disgrace to the institution.

14. Acceptance or giving of Gifts / Benefits

- 14.1 No employee must accept money, inappropriate or excessive gifts, loans, excessive hospitality, or other special treatment or items of value (Cash payments, gifts, entertainment, excessive business promotional activities, covering or reimbursing expenses, investment opportunities, shares, securities, loans or contractual rights, promise of future employment, payments under consulting agreements, subcontracts, stock options, and similar items of value) from any supplier, customer or any interested party which could impair an employee's judgement or be perceived to be a conflict of interest, bribe or inappropriate gift. A gift or hospitality is inappropriate or excessive if, under the circumstances, it has a value or is of such a personal nature that it is out of proportion to Bank's business needs;
- 14.2 All employees must comply with anti-bribery policy of the Bank. A bribe is anything of value that may be seen as an attempt to influence an action or a decision in order to obtain or retain business or acquire an improper advantage. This could include money, gifts, favors, use of company resources, entertainment or other items of value.
- 14.3 An occasional gift which is infrequent and is of limited value and is unlikely to lead someone to feel obligated or influenced by them may be accepted, although employees are encouraged to share the gift baskets with other employees in their department.

14.4 Employees should be governed by the Bank of India Officer Employees' (Conduct) Regulations, 1976 and related guidelines applicable to employees as they refrain from accepting or giving any favor, gift, entertainment or any other benefit subject to certain conditions.

15. Corruption and Anti-Money Laundering

15.1 As employees, we must have zero tolerance for corruption. We must act with the utmost caution in this regard, especially being the custodian of public money. We must never solicit, accept or offer any bribes or other benefits of a similar nature in the performance of our duties. Our behaviour must not lead others to believe that we would accept such advantages.

15.2 We must take all necessary measures to reduce the risk that the Bank's products and services are used for money laundering and terrorist financing purposes. In our day-to-day activities, we must apply the principles set out in the Anti- Money Laundering Policy and the standards and procedures that stem from it. We must also immediately identify and report any unusual transactions or attempted unusual transactions.

15.3 To be careful not to be involved in any kind of fraudulent or illicit transactions, directly or indirectly, such as theft, manipulation of accounting files, misappropriation of funds, appropriation of the Bank's funds, falsification of accounts, documents and files, and fraudulent use of the Bank's registers and resources. It is also our duty to report any suspicious activity immediately.

16. Product Appropriateness & Suitability

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

17. Assets and Resource Usage

All employees shall protect and ensure efficient use of Bank's assets including but not limited to the result of an employee's work, money and funds, Information about corporate or customer transactions, Intellectual Property, proprietary information, equipment, computer systems and software, furnishings etc.

18. Intellectual Property

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

19. Reporting Violations via Whistle Blower Policy

- 19.1 The Bank encourages an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's superior is in the best position to address an area of concern.
- 19.2 Any violations or suspected violations or of events that could lead to any such violations perceived violation of the Code may be reported under Bank's Whistleblower Policy without fear or reprisal or being threatened by doing so. Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.
- 19.3 All concerns raised by the employee must be treated promptly, fairly and discreetly without being disadvantaged or victimised for raising good faith concerns.
- 19.4 Violations or suspected violations may be submitted on a confidential basis or may be submitted anonymously.

20. Employee Conduct

- 20.1 Employees should ensure accuracy of Bank's operations and financial records that they are aware of within the framework of their duties. These include not only financial accounts, but other records such as quality reports, time records, expense reports and submissions such as benefit claim forms. Employees must report their claims/ expenses such as conveyance, transportation, halting, reimbursement claims, Bank's car etc accurately and in a timely manner.
- 20.2 Employees should maintain good conduct, discipline, punctuality and show courtesy and attention to all persons – colleagues, customers, business associates & vendors, regulators, and any other external stakeholders, in their transactions or dealings with the Bank.
- 20.3 Employees should ensure that they are appropriately dressed and properly groomed at all times.
- 20.4 Employees shall adhere to the Bank's work timings and leave management guidelines at all times.
- 20.5 Employees should ensure that they use their staff accounts for bona fide transactions.
- 20.6 Employees must desist from discriminating against, harass or bully any other employees.
- 20.7 The behavior of employees must reflect sincerity and willingness to learn from their mistakes and ability to view failures as feedback that provides them with the information they need to learn, grow and succeed.
- 20.8 Each employee must accept responsibility for their actions.

21. Public Representation

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

22. Environmental considerations

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

23. Audit & Investigation

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

24. Handling of Market News/Information

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

24.2 Employee should bear in mind that any market related news received by them either in their official mail/personal mail/blog or in any other manner, should be forwarded only after the same has been seen and approved by the Competent Authority. If an employee fails to do so, he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for action.

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

An employee who violates this Code will become liable for prompt corrective action including appropriate disciplinary action depending on the nature, severity, and frequency of the violation. Staff Officers of the Bank are governed by the Bank of India Officer Employees' (Conduct) Regulations, 1976 and the Award Staff members by the disciplinary action procedure laid down in the Bipartite Settlement dated 11.11.2020 amended up to date.

26. Review of the Policy :

The Policy will be reviewed after three years except in the light of any statutory requirement. Notwithstanding, the Bank reserves the right to review, modify and amend the policy whenever deemed necessary.

Annexure 1- Declaration Form

DECLARATION

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

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

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

Employee Name: _____

Signature: _____

P.F.No : _____

Date: _____