



# **CODE OF ETHICS**

## 1.1 PREAMBLE

As a financial institution, the activities of **FSDH MB** are affected by laws and regulations as well as its responsibilities to its shareholders, customers, employees and the community in which it operates.

The Code of Conduct provides the avenue for ensuring that the conduct of FSDH MB's employees is consistent with the company's corporate responsibilities.

The contents of this Code of ethics form part of the contract of employment and/or of service between FSDH MB and its employees.

We encourage you to take this opportunity to review our policies and to discuss any questions you may have with your supervisor or with the appropriate department directly.

The guidelines set out in this Code are to be followed at all levels of this organization by our directors, officers and employees.

We rely on you to uphold our core values and conduct our business honestly, fairly and with integrity

## CORPORATE STATEMENT

As an employee of FSDH MB, you are expected to fully abide by the corporate objectives of the institution FSDH MB which are stated in the Company's vision and mission statements.

**Corporate vision- "To be a leader in our chosen markets".**

**Corporate Mission- "To partner with our customers to create value for them through the provision of innovative and superior financial products and services".**

## GENERAL EMPLOYEE CONDUCT

The Company expects a high level of performance and dedication to duty from all employees, while providing job fulfillment for all its staff.

The obligations of the Company's employees may be summarized as follows:

## 1.2 Employee Obligation:

- a. To exhibit a sense of personal responsibility for the quality of work produced based on the principle of a fair day's work for a fair day's pay.

- b. To constantly endeavor to reduce loss of time to a minimum and to avoid any action likely to impede the work.
- c. To take personal care of all company's property and all amenities provided for the use of staff.
- d. To make constructive suggestions for the improvement of method, efficiency and working conditions.
- e. To demonstrate a sincere and active endeavour to cooperate and establish friendly relations with fellow employees and the management, and to faithfully carry out instructions on job functions at all times.

### **1.3 Conflict of interest:**

A financial institution's reputation for integrity is its most valuable asset and is directly affected by the conduct of its employees. For this reason, employees must not use their position for private gain, to advance personal interests, or to obtain favors or benefits for themselves, members of their families or any other individuals or business entities.

No employee shall directly enter into or maintain a relationship with another business concern or individual especially when such a relationship is in conflict or prejudicial to the interest of the company. The company requires employees to avoid any conflict between their personal interests and the interests of the company in dealing with suppliers, customers, dealers and all other organizations or individuals doing or seeking to do business with the company. Where such interest exists, full disclosure of the interest must be reported to the HR Dept., with a copy sent to the officer's immediate supervisor and staff file.

If an employee has any doubt about a certain situation, the employee should contact his or her supervisor to discuss it immediately.

### **1.4 Gifts to Employees:**

It is contrary to the general policy of the company for staff or members of their families to accept gifts of substantial value from a customer, contractor, supplier or vendor of the company other than branded, widely distributed items such as calendars or diaries. In the event that such gifts come into FSDH MB, they should be returned with a letter of appreciation and an explanation of the Company's corporate policy on gifts to staff.

On no circumstances should cash gifts be accepted from a customer, contractor, supplier or vendor of the Company.

## **1.5 Secrecy**

All staff members are bound by the confidentiality clause contained in the letter of employment which precludes staff from divulging confidential data, investment information, or any such information that may be deemed by the Management as confidential to other employees, ex-employees or the public.

Furthermore, the unauthorized use or release of confidential information during or after employment is a breach of this Code of Conduct .

## **1.6 Insider trading**

An employee's position with FSDH MB may provide the employee with access to "material non-public information".

"Material non- public information" includes information that is not available to the public at large which will be important to an investor in making a favorable financial/ investment decision. An employee in possession of "material non-public information shall not pass that information on to any person not employed by FSDH MB unless specifically authorized to do so (say in the case of professional advisers such as lawyers or to regulatory agencies such as the Central Bank).

## **1.7 Money laundering and transaction structuring**

FSDH MB may unknowingly be used to launder money derived from criminal activity. The intention behind these types of transactions is to hide ownership of the funds from the Government. FSDH MB makes every effort to avoid being associated with money laundering or any other type of criminal activity by fully complying with all laid down regulations concerning any type of illegal activity.

FSDH MB's employees are prohibited from engaging in money laundering and related activities.

All employees are required to immediately report all attempts to launder money, structure a transaction and/or all suspicious activities to the company's chief compliance officer or to the head of internal audit.

## **1.8 Embezzlement, theft and misapplication of funds.**

FSDH MB holds each employee responsible for maintaining accurate and complete records. Anyone who embezzles, steals, or willfully misappropriates any monies, funds or credits of FSDH MB is subject to the full disciplinary process of FSDH MB and the regulatory authorities.

## **1.9 Press Articles**

An employee will not submit to the press articles dealing with the company's interests or activities of the company's conditions of service without receiving the prior approval of the Managing Director, or delegated approving authority.

## **2.0 Use of Corporate name and letterhead**

FSDH MB's name, logo or corporate letterhead may not be used for any purpose other than in the normal course of official business, unless expressly approved by Senior Management.

## **2.1 Drug/Alcohol Abuse:**

The company recognizes drug abuse as a major problem confronting society. The use of illicit drugs and controlled substances of any type by members of staff is strictly prohibited and will not be tolerated. Supervising officers will therefore take keen interest in the welfare of staff working under them and be vigilant in order to be able to detect the slightest sign of drug addiction. Where a Supervision officer identifies that an employee is illegally using or selling dangerous drugs, the Personnel Unit must be notified.

**Alcohol-** Alcohol may not be consumed on the Premises of FSDH MB.

**Smoking** – The Premises of FSDH MB is a Smoke Free Zone. Smoking of cigarettes, pipes, cigars or other tobacco products is prohibited on the Premises of FSDH MB.

## **2.2 Social Relationships**

To prevent the breakdown of discipline, the Company does not encourage intimate social relationships within the office environment. Activities relative to such a relationship may not be conducted on FSDH MB's Premises.

## **2.3 Mode of Dressing:**

Employees are expected to maintain an appearance that is modest, business-like, neat and clean as determined by the needs and requirements of work areas. Consequently, dress and appearance should not be offensive to clients and other employees.

## **2.4 Sanctions**

For breaches of the provisions in this code of ethics, the matter will be referred to the disciplinary Committee of FSDH MB for consideration. This Committee is made up of the following:

The Managing Director, Other Members of Senior Exco., The Head of Human Resources

\*other members of staff may be invited to be part of the committee depending on the unit / department of the offending staff.

For instances of breaches with no precedent, the Committee will use its best judgment in deciding on the appropriate sanctions.

**FSDH MB RESERVES THE RIGHT TO AMEND, SUPPLEMENT OR DISCONTINUE THIS CODE AND THE MATTERS ADDRESSED HEREIN, WITHOUT PRIOR NOTICE AT ANY TIME.**

**As approved by the Board on the 21 of March 2019.**