

Conflicts of Interest Group Policy

The Group Conflicts of Interest Policy's main objective is to ensure that the Group maintains effective conflicts of interest processes and procedures for the identification, prevention and management of Conflicts of Interest (COI) and to comply with the legal and regulatory frameworks.

All Bank stakeholders, in particular Directors, Executives and Managers including all members of staff have a personal responsibility to disclose any COI and abstain from a transaction that may have a COI or take the appropriate steps to manage the COI. This responsibility should be explicitly stated in all employment contracts, agreements with various stakeholders, service providers, suppliers etc.

Within a financial institution COI may arise in a variety of situations. Possible areas include (not limited):

- Portfolio management
- Investment services
- Corporate banking
- Personal accounts
- Loan Restructuring
- Sale of Loans

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