



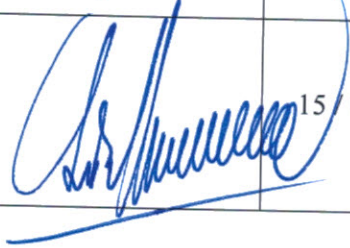


ACLEDA Bank Plc.

Policy Document

Code of Conduct Policy

Dated: 12/12/2014
First Revised: 15/02/2018

Responsibility	Name/Position	Signature	Date
Prepared and Submitted by:	Dr. In Channy, For and on behalf of EXCO, Chairman		15 / 02 / 2018
Endorsed by:	Drs. Pieter Kooi, For and On behalf of Board Risk, and Audit and Compliance Committees, Chairman		15 / 02 / 2018
Approved by:	Mr. Chhay Soeun For and On behalf of the Board, Chairman		15 / 02 / 2018



ACLEDA Bank Plc. Code of Conduct Policy

Article 1. Purpose

ACLEDA Bank Plc. is recognized as "The bank you can trust, the bank for the people" through the provision of a full range of products and financial services to public and private sectors. Fair and ethical practices by all individuals involved within ACLEDA Bank Plc. are a fundamental basis to support the bank's mission and its business operations.

Article 2. Objective and Scope

The objective of this policy is that all staff members of ACLEDA Bank Plc. shall pursue the highest standards of ethical conduct in the best interest of all stakeholders of the bank.

This Policy sets ethical standards for all staff members of ACLEDA Bank Plc.

Article 3. Principles

This Policy covers the following important principles

3.1. Honesty, Fairness and Integrity

- All staff members shall act honestly and with integrity in all of their dealings for ACLEDA Bank Plc.
- Staff members will not discriminate on the grounds of people's race, religion, gender, marital status, or disability.
- Staff members will not make promises or commitments that ACLEDA Bank Plc. does not intend, or would be unable, to honor.
- Staff members will always conduct themselves in such a way that their honesty is beyond question.
- Staff members shall adhere to the truth, and not mislead directly or indirectly nor make false statements, nor mislead by omission.
- Staff members shall never solicit for themselves or for a third party (other than the ACLEDA Bank Plc. itself) anything of value from anyone in return for any business, service or confidential information of the Bank.
- Staff members shall disclose any conflict of interest in line with the Policy on Conflict of Interest.

3.2. Personal Transactions

- Staff members' personal or other business dealings will be kept separate from their dealings as staff member of ACLEDA Bank Plc.
- Staff members shall not use the name of ACLEDA Bank Plc. to further any personal or other business transaction.
- Staff members shall use goods, services and facilities provided to them by the Bank, strictly in accordance with the terms on which they are provided.

3.3 Confidentiality of Information

- Staff members will ensure that confidential information relating to customers, staff and ACLEDA Bank Plc.'s operations is not given either inadvertently or deliberately to third parties without the consent of the management of ACLEDA Bank Plc., unless legally required.
- Staff members will ensure that ACLEDA Bank Plc. has the necessary administrative, technical and physical safeguards to protect sensitive customer information.
- Staff members will not use information obtained by them for personal financial gain, nor will that information be used to obtain financial benefit for any other person or business.
- Staff members shall respect the privacy of others.

3.4. Ensuring the Integrity of Records and Internal Controls

- Staff members shall ensure that internal accounting information and customer records are accurate and maintained with reliability and integrity.
- Staff members shall ensure that transactions will be reflected in an accurate and timely manner.
- Staff members shall comply with the internal control procedures established by ACLEDA Bank Plc. for the safeguarding of assets and proper reporting and disclosure of financial information.

3.5. Abiding by the Law

- Staff members shall observe and abide by the law, rules and regulations of the kingdom of Cambodia and internal policies of ACLEDA Bank Plc. at all times.
- Staff members will be required to respond honestly and candidly when dealing with internal auditors, independent auditors, regulators and attorneys.

Article 4. Roles and Responsibilities

All staff members will promote honest and ethical conduct, compliance with applicable rules and regulations, and accountability in adhering to this Policy.

Management will ensure that staff members are aware of all applicable laws and regulations.

Management will take the opportunity on at least an annual basis to effectively communicate the importance of this Policy to staff members and management's clear expectations of acceptable business behavior by all staff members.

Management will establish a hotline or other avenues to allow staff members, suppliers, third party service providers and customers to report questionable activity or instances where this Policy is not being followed, and to have their concerns addressed in a confidential manner. By establishing the hotline or other avenues it should be taken into account that information conveyed could be of highly sensitive nature, like sexual harassment, discrimination, extortion or corruption.

Management shall, based on this Conduct of Conduct, develop a professional Policy Operating Manual which will assign the responsibilities and stipulate the procedures to ensure proper execution of this policy.

The Human Resources Division will employ appropriate pre-employment background checks adjusted to the position and responsibilities of the post applied for.

The Human Resources Division will provide periodic training and acknowledgment of this Policy.

The Audit Division/ Department under supervision of Group Chief Internal Audit Officer will monitor that the Bank's systems, controls and procedures are adequate to identify and manage any violations of this Policy.

Article 5. Disciplinary action

Any breach of this Policy by any individual can result in disciplinary action in line with the Disciplinary Action Policy.

Article 6. Review and Effective Date

This Policy will be periodically reviewed, and at least once a year, to determine its ongoing viability and applicability and to ensure that the implementing procedures of ACLEDA Bank Plc. (including training, monitoring, testing, reporting, etc.) are structured to best ensure compliance.

This Policy shall become effective on (date)

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