






ACLEDA Bank Plc.

Policy Document

Conflict of Interest 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 Executive Committee, 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. Conflict of Interest Policy

Article 1. Introduction

ACLEDA Bank Plc. faces actual and potential conflicts of interest in the course of its business. ACLEDA Bank Plc. is determined that the Bank must manage conflict of interest fairly, both between itself and its customers. 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. This policy supplements the Code of Conduct Policy. This policy does not create any third party rights in case it is breached by a staff member of ACLEDA Bank Plc.

Article 2. Objective and Scope

A conflict of interest situation arises when a person or an institution, in a position to exercise judgment on a matter, has divergent interests

The objective of this Policy is to take all reasonable steps to maintain and operate effective organizational and administrative arrangements to identify and manage relevant conflicts.

This Policy applies to all staff members of ACLEDA Bank Plc.

ACLEDA Bank Plc. will identify and disclose to its staff members a range of circumstances which may give rise to a conflict of interest such as the following:

- a. Providing or receiving benefits, favors or gifts
- b. Dealings with close relatives
- c. Concurrent employment and self-employment (outside private activities)
- d. Dealings with former employers
- e. Dealings with future employers and employment after separation
- f. Disclosure and use of non-public Information
- g. Other employment activities
- h. Honoraria from outside sources
- i. Instructions and remuneration from outside sources
- j. Providing or receiving medals, decorations & honors
- k. Personal financial interests
- l. Political activity (outside public activities)
- m. Public office (outside public activities)
- n. Public statements.
- o. Supervisory relationships.
- p. Use of ACLEDA Bank Group services, supplies, or facilities
- q. Making gains at the expense of a customer
- r. Having incentive to favor the interest of a customer

Article 3. Principles

- 3.1 ACLEDA Bank Plc. is committed to professionally managing actual and potential conflicts of interest which may arise in the course of the Bank's business.
- 3.2 ACLEDA Bank Plc. will have in place specific procedures that address the identification and management of potential conflicts of interest that may arise in the course of ACLEDA Bank Plc.'s business.

- 3.3 Staff members' dealings with ACLEDA Bank Plc. will always be at arm's length to avoid the possibility of actual or perceived conflicts of interest.
- 3.4 All staff members shall fully disclose their interest, to relevant parties, in situations which has or may lead to potential or actual conflicts of interest.
- 3.5 All staff members receive instructions and guidance regarding managing of conflicts of interest.
- 3.6 Adequate records are maintained of the services and activities of ACLEDA Bank Plc. where a conflict of interest has been identified.

Article 4. Roles and Responsibilities

Management is responsible for ensuring that systems, controls and procedures are adequate to identify and manage conflicts of interests. Management is responsible for identifying, preventing and managing conflicts of interest.

Management will maintain a register of services, activities and transactions carried out on behalf of ACLEDA Bank Plc. which could give rise to a conflict of interest. Examples of such situations are stated in Article 2.

Management will establish processes, procedures and arrangements to manage potential conflicts of interest.

The Legal Division is responsible to assist management in identification and monitoring of actual or potential conflicts of interest

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 ACLEDA Bank Plc.'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)