

INTEGRITY STRATEGY

EXPORT IMPORT BANK OF BANGLADESH LIMITED

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PREAMBLE

Our beloved country Bangladesh achieved its independence after a long struggle for freedom and a heroic war of liberation. In the Constitution of Bangladesh, ‘respect for the dignity and worth of the human person’ has been enshrined as a fundamental principle of state policy, and a commitment has been expressed to bar on enjoyment of ‘unearned incomes’. For proper implementation of this policy, corruption has to be prevented and integrity has to be promoted in all affairs of the state and society. Our Bank, being fully aware of this imperative, has taken a well-coordinated attempt to formulate this Policy titled *EXIM Bank Integrity Strategy*.

Integrity generally means behavioral excellence influenced by ethics, morality and honesty. It also implies adherence to time-tested norms, values, customs and principles of a society. At the individual level, it means being duty-bound and honest. In this Policy, primarily this meaning has been kept in view. The quality of being honest and having strong moral principle are valued most among all other virtues in the world. We come to know from history that all the great achievements in this world required the highest form of probity and integrity. We also know that future success depends on doing the right things in this very moment. If anyone is serious about being a great business leader in future, he/she needs to be serious about acting with integrity now. The same rule is applicable to organizations or individuals as well.

When an organization’s reputation is damaged, there ensues a tragic loss for the both customers and for good employees. That is why EXIM Bank is committed to promote integrity in its total environment– in Divisions, Branches and in its all offices. From the very beginning of its start, the management of the Bank is taking a proactive approach to prevent irregularities by offering trainings about ethics and integrity. We have our own *General Code of Conduct* which was introduced to ensure internal and external integrity among our employees. As our bank is being expanded day by day and as newer forms of frauds and crimes are also booming in financial institutions, we have prepared this Policy to define the ethical behavior and operation in the banking profession with a view to curbing corruption and malpractices by ensuring transparency and accountability in all stratum.

Ethical set-rules, norms and values are the sources of guidelines in this Policy. As ours is an Islamic Bank, we have tried to reflect in this Policy the guidelines of Shariah. Besides, the *National Integrity Strategy* introduced by our government and the guidelines of Bangladesh Bank are also the sources of rules in this Policy.

Dr. Mohammad Haider Ali Miah
Managing Director & CEO

1. CHAPTER-I: OVERVIEW AND MEANING OF INTEGRITY

- 1.1 The word "integrity" stems from the Latin adjective *integer* meaning whole or complete. In this context, integrity is the inner sense of "wholeness" deriving from qualities such as honesty and consistency of character. It consists of loyalty to rational principles. It is an uncompromising consistent commitment to honour moral, ethical, spiritual and artistic values and principles.
- 1.2 Integrity is one of the most important and oft-cited of virtue terms. When used as a virtue term, 'integrity' refers to a quality of a person's character; however, there are other uses of the term. For example, one may speak of the integrity of a wilderness region or an ecosystem, a computerized database, a defense system, a work of art, and so on.
- 1.3 The term integrity can be attributed to various parts or aspects of a person's life. We speak of attributes such as professional and intellectual integrity. However, the most philosophically important sense of the term 'integrity' relates to general character. In this sense, Integrity is the base of one's actions on an internally consistent framework of principles. One is said to have integrity to the extent that everything he does and believes is based on the same core set of values.

2. CHAPTER-II: DEFINITION OF INTEGRITY

- 2.1 Integrity generally means behavioral excellence influenced by ethics, morality and honesty. It also implies adherence to time-tested norms, values, customs and principles of a society. At the individual level, it means being duty-bound and honest.
- 2.2 In other words, Integrity means steadfast adherence to a strict moral or ethical code, that won't allow a person to do certain things that he/she feel would debase him/her. It generally refers to a concept of consistency of actions, values, methods, measures, principles, expectations, and outcomes.
- 2.3 We can also define integrity as doing the right thing even when no one else is around. It is the ability to act with honesty and be consistent in doing things based on some particular morals, values or beliefs. Beliefs, values and morals all relate to the culture in which a person operates, so culture plays a role in determining exactly what integrity involves. A company or institution is sure to run with integrity if a working culture based on honesty, accountability and transparency is ensured there.

3. CHAPTER -III: IMPORTANCE OF INTEGRITY IN BANKING

- 3.1 The foundation of self-confidence is living in accordance with values and working in accordance with integrity.
- 3.2 As long as someone knows he/she is doing the right thing, the world can collapse around him/her but he/she will maintain peace of mind, calm and confidence.
- 3.3 Integrity is an essential value to have, and it is more than a value as it ensures that all the other values are respected and lived in line with.
- 3.4 When a bank acts with integrity, it builds trusting relationships with employees and customers. Its reputation rises as a result, positively affecting productivity and sales.
- 3.5 When trust is in place in a business, employers and employees are open with each other. They are not afraid to express their true views or opinions. This type of communicative environment lets employers give their employees a certain amount of independence, even when those employees are assigned to groups or teams. In return for this independence, employees exercise increased creativity, which ultimately lets a bank adapt to the ever-changing marketplace to stay competitive.
- 3.6 In this age of globalization, the ethical issues in electronic fund transfer have assumed great importance in the national and international context.
- 3.7 Trust must always be underwritten by ethics which obligate a person to honour his/her word. If there is no substructure of ethics to a relationship of trust, we shall have to spend all our time in the law courts.
- 3.8 When a bank fails to act with integrity, however, the public's view of the business becomes more negative. Over time, this can mean customers turn away and employees leave, drastically lowering the bank's profit margin.
- 3.9 Ethics and integrity in banks, therefore, protect the interest of the depositors' money in the bank in the first place and in the second, make judicious investment of the money to earn fair income for its stakeholders.
- 3.10 As banks are social institutions, the banking ethics and integrity require the banks to make investment to the weaker and disadvantaged sections of the society with due care, without jeopardizing the interest of the stakeholders.

4. CHAPTER-IV: ISLAMIC BANKING WITH REGARD TO JUSTICE, MORALITY AND ETHICS

- 4.1 The concept of justice ('adl) occupies a central place in the economic system of Islam. Justice is prescribed in legal, social, moral and economic dealings. It is to be practised with individuals, tribes, communities, nations and even with peaceful enemies. It is applicable to speaking, giving witness, acting as a guardian, writing an agreement, arbitrating between parties, dealing with other people, judging in a court of law and making business transactions. The concept of justice in an economic context encompasses fairness, equity, balance, equilibrium, symmetry and impartiality. The aim of an Islamic bank is to ensure justice in all its economic activities by Maintaining corporate & business ethics and transparency at all levels.
- 4.2 Some points are noted bellow showing the concept of ethics in Islamic banking and a comparative study between Islamic banking and traditional banking –
- 4.2.1 All Islamic banks are expected to be ethical in ways similar to their conventional counterparts. These ethics include among others conducting operations with integrity and with due skill, care and diligence, avoid conflict of interest, etc.
- 4.2.2 As ethics relates to the notions of what is right and wrong in the organizational context, for Islamic bank it is also influenced by the Islamic notions of legality and morality. As such, our bank has additional ethical dimensions arising from our adherence to the laws and morals of *Shari'ah*.
- 4.2.3 If the ethical and legal norms coexist in a banking transaction, it brings good for both the bank and the customer.
- 4.2.4 Activities of an Islamic bank are considered ethical if they enhance welfare (*maslahah*) and morality of individuals in the society. On the contrary, any banking practice that produces adverse effects on either welfare or Islamic morals is considered unethical.
- 4.2.5 The Holy Qur'an makes clear provisions for business contracts, weights and measures, trust, etc. believers can do business even when they perform Hajj. Debarred by the Shariah from charging interest, Islamic Banks since 1960s devised a variety of trading and sharing practices like –
- 4.2.5.1 Mudaraba (unit trust agreement),
- 4.2.5.2 Murabaha (resale contract),
- 4.2.5.3 Musharaka (a venture partnership),
- 4.2.5.4 Ijara (leasing),

- 4.2.5.5 Wadia (pawn brokering agreement),
- 4.2.5.6 Takaful (mutual insurance), and
- 4.2.5.7 Qard-e-hasana (Investment without interest).
- 4.2.6 The basic difference between Islamic and conventional banks lies in the face that the former operate on an equity participation system in which a predetermined rate of return is not guaranteed, whereas the latter's operations are based on both equity and debt systems that are mainly driven by interest (riba).
- 4.2.7 Due to the unique characteristics of the Islamic banking system, a customer will get mayoral satisfaction from most aspects of an Islamic bank products and services. Islamic banks thus, have competitive advantage in terms of enjoying customer confidence.
- 4.2.8 The Islamic marketing principles combine a value-maximization concept with the principle of justice for the wider welfare of the society. These principles offer a means to create value and elevate the standard of living of people in general through commercial pursuits.
- 4.2.9 The Islamic ethical guidelines ensure respect for, and the individual freedom of , both the bankers and customers. Islamic ethics dictate that under no circumstances should marketers exploit their customers or any way involves themselves in dishonesty, fraud or deceit.

5. CHAPTER -V: RATIONALE FOR THE INTEGRITY STRATEGY

It may be argued that laws, regulations, systems, processes and their reform elements can play an effective role in the prevention of corruption and may appear adequate. But experiences suggest that they are not enough to provide desired and full results due to lack of proper implementation. The rationale for an Integrity Strategy can be pointed as follows –

- 5.1 Previously economic, developmental and social activities of our bank were not so voluminous; in recent times those activities have grown in huge proportion and number. These have added complexities in the planning and implementation of the activities, and huge quantities of resources are involved in them. In this context a well-arranged Integrity Strategy can run the bank in a proper and just way.
- 5.2 Though the existing policies and processes of our bank are still functioning very well, we further need to strengthen our present culture of working with morality and

integrity. In this context the 'Integrity Strategy for the Employees of EXIM Bank' is an effort to prevent corruption in our banking activities.

- 5.3 EXIM Bank considers the prevention of corruption a movement and puts importance on 'establishment of transparency and accountability', 'promotion of ethics and values', and 'improvement of rules, regulations and code of conduct system'. It is felt that a coordinated and well-planned integrity strategy will be able play a very important role in this movement.

6. CHAPTER -VI: ESTABLISHMENT OF "EXIM BANK MORALITY COMMITTEE"

The Government of the People's Republic of Bangladesh has recently undertaken a policy named *National Integrity Strategy* to curb corruption nationwide with a vision of developing a 'Bangla of Gold'. The strategy requires that the private sector commercial banks play an important role in implementing the strategy. In this connection, with the directives of Bangladesh Bank a committee named "EXIM Bank Morality Committee" is to be formed taking appropriate number of executives from different levels by MD & CEO of the Bank.

7. CHAPTER -VII: FUNCTIONS OF EXIM BANK MORALITY COMMITTEE

The committee shall –

- 7.1 report to the Managing director and CEO of all its activities;
- 7.2 hold meetings time to time to discuss the progress in integrity compliance and to review and develop the integrity strategy in our bank.
- 7.3 be responsible for formulation of all policies relating to the implementation of the Government-initiated National Integrity Strategy and their successful implementation in our bank;

8. CHAPTER -VIII: DUTIES AND RESPONSIBILITIES OF THE FOCAL POINT

- 8.1 The MD & CEO shall nominate a senior levels executive as the 'Focal Point' of our bank to administer the integrity related issues. The 'Focal Point' will-
- 8.2 make liason with Bangladesh Bank and other regulatory bodies;
- 8.3 try to ensure integrity in all the divisions and branches of the Bank and for this he will give directions, recommendations and work plans;
- 8.4 make a report in every three months and submit it to Bangladesh Bank;

- 8.5 try to inform all the employees from the highest rank to the lowest of the *National Integrity Strategy* initiated by the government;
- 8.6 motivate the proper authority to introduce automation in every section of the bank;
- 8.7 take initiative to form a committee in every branch to ensure integrity there;
- 8.8 call for meetings of the EXIM Bank Morality Committee to discuss the progress and to adjust the bank to various government policies regarding *National Integrity Strategy*;
- 8.9 recommend punitive measures for those compromising integrity in any part of their activities.

9. CHAPTER-IX: TASKS TO BE DONE BY THE OFFICES FOR ESTABLISHING INTEGRITY CULTURE

- 9.1 The Branches/Divisions shall extend full cooperation to implement the Integrity Strategy in their respective working environment. All Divisional Heads and Branch Relationship Managers will work as the Integrity coordinators in their respective areas of business and they will correspond with “EXIM Bank Morality Committee” in all affairs related to Integrity Strategy. The coordinators will monitor the Integrity compliance in their jurisdiction and if they find any incongruity in compliance with the Ethical Code of Conduct, they will immediately report to the chairman of “EXIM Bank Morality Committee”.
- 9.2 The Integrity coordinators will encourage their fellow employees to practice ethics in everyday personal and business life. The Integrity coordinators will have to submit their annual compliance report mentioning whether there is any breach of the Ethical Code of Conduct by any employee to the chairman of the “EXIM Bank Morality Committee”, Head Office.
- 9.3 The Branch/Division shall recognize the prevention of corruption a movement and shall make sure that no corruption is taking place in their business.

10. CHAPTER- X: ETHICAL ISSUES: GENERAL AND ISLAMIC PURVIEW

- 10.1 Ethics is the integrity measures, which evaluate the values, norms and rules that constitute the base for individual and social relationships, from a moral perspective. *Professional ethics* regulates the relation between individuals within a professional group whereas *organizational ethics* defines the code of conduct in an organization. Banks play unifying and intermediary roles between fund-surplus and fund-deficit sides of the society, executing savings and investment functions. Due to their key role in the economy, while working under the principles of profitability and productivity, banks are obliged to obey ethical principles of banking profession and organizational ethics.

Considering the requirements for protection of rights and interests of depositors, establishment of stability and confidence in financial markets, and requirements for economic development, banks have to pursue their operations in compliance with the following general principles.

- 10.1.1 **Integrity:** Banks, while performing their activities, consider the principle of integrity in their relations with customers, employees, shareholders, group companies and other banks, institutions and corporations.
- 10.1.2 **Impartiality:** Believing the importance of respecting people for being successful banks do not make any discrimination among their employees or their customers, and avoid any prejudiced behavior.
- 10.1.3 **Reliability:** In all services and transactions, banks serve the customers in a mutual understanding of confidence, and provide their customers with clear and accurate information, and render customer services completely and on a timely basis.
- 10.1.4 **The Principle of vicegerency on earth.** Human being is the representative of Almighty Allah. Allah has forbidden Riba in unequivocal term and instructed to ensure that wealth is not concentrated in a few hands. Allah has also instructed men to establish equity and justice in economic affairs. The Bankers, therefore, are required to follow and implement the above guidelines of Allah.
- 10.1.5 **Sincerity :**The Bankers must performs their duties sincerely in all circumstances not only to satisfy the customers need and the expectation of all stakeholders at large but also to ensure that all activities of the Banks are poised to develop the economy of the society.
- 10.1.6 **Righteousness and making one's work perfect.** The Bankers must aspire for achieving excellence in all his work in order to become an expert in their profession. Doing their job in a nice way will add more value and give satisfaction to all stakeholders.
- 10.1.7 **Allah fearing conduct in everything:** The Bankers always keep in mind they are under the constant watch of the Creator. Whatever they do or say is recorded and that they will be asked about their deeds in the world hereafter.
- 10.1.8 **Men's accountability before Allah.** According to Allah's commandment, Human being is responsible to establish justice, gracious conduct or kindness, proper or good acts, institutions, to eliminate evil, wrong or injurious practices from economic life and to free the humanity from unwanted burdens to make life easier for them.
- 10.1.9 **Trustworthiness:** Banking is the business of confidence and trust. The Bankers should not do anything which can raise suspicion among the stakeholders.

- 10.1.10 **Legitimacy.** All dealings of the Bank must be legitimate. Undue favor or disfavor not to be done to anyone. All cases to be disposed off or handled according to merit.
- 10.1.11 **Objectivity:** The Banks are the principal agent of economic growth of the Economy. The utilization of resources of the Banks should be such objectively that it accelerates the growth of the economy and that disparity between and among the various economic groups of the people can be removed.
- 10.1.12 **Professional competence and diligence:** For achieving the desired result, it is essential that the Bankers acquire technical, human and conceptual skill properly and perform their duty very carefully and earnestly.
- 10.1.13 **Faith driven conduct:** The Bankers must have strong commitment to Allah and the institution and system for which they work.
- 10.1.14 **Professional conduct and technical standards:** The norms, rules, regulations, and practices of Banking must be observed very meticulously by the Bankers. They should not do anything which is tantamount to set principles and accepted norms of the society.
- 10.1.15 **Transparency:** Banks inform customers in a clear and lucid manner on subjects such as rights and obligations, benefits and risks of the products and services provided to them.
- 10.1.16 **Consideration of Social Interests, and Environmental Awareness:** Banks may fulfill their social responsibility and environmental awareness through supporting social and cultural activities.
- 10.1.17 **Coping with Money Laundering:** Within the framework of international and national regulations, banks cope with offences such as frauds and money laundering with other relevant institutions, establishments and government agencies for this purpose.
- 10.1.18 **Relations among Banks:** Within the framework of the current legislation, banks ensure that the information exchanged by the parties shall always be honest and complete. They obey with the principles of confidentiality both for their customers and for their organization.
- 10.1.19 **Human Resources:** Banks refrain from actions that can create unfair situation in case of employee recruitment. Although there stands flexibility for both parties in terms of work contracts and mobility, banks have to manage their recruitment and retention policy with maximum care so that every single employee can experience a just and fair working environment. Banks make honest and accurate referencing on their ex-employees, upon request.

- 10.1.20 **Competition:** Banks consider competition as an opportunity, enabling them to take their economic decisions freely underlined with the current regulations. Banks must avoid any actions that would create unfair competition with the aims of: (a) Maintaining confidence in the banking sector in general, (b) Spending efforts for the development of the sector, and (c) Consideration of common interests.
- 10.1.21 **Announcements and Advertisements:** In all publications, announcements and advertisements for the promotion and marketing of either their financial status or banking products and services, banks have to abide by both relevant laws and regulations and the generally accepted moral values; and act in an honest and realistic manner. In their publications, announcement and advertisements, banks do not use derogatory terms and phrases which go against other banks or other groups.
- 10.1.22 **Informing Customers:** Banks provide accurate, complete and timely information on their products and services offered to their customers. They avoid giving inaccurate or incomplete information to the customers.
- 10.1.23 **Confidentiality:** Except for the information and documents required to be disclosed to certain authorized persons or entities as specified in the related laws and regulations, banks are obliged to handle any personal and financial information provided by the customer's with utmost confidentiality.
- 10.1.24 **Service Quality:** Banks take maximum care to use technological infrastructure and qualified human resources, as means for continuous development of the service quality. They don't make discrimination on nationality, religion, financial and social status and gender. However, differentiation arises from determination of a target market and dissimilarities originating from organizational structures and product range according to the target mass, or different approaches to high-risk customers, should not be construed as an evidence of prejudice or categorization among customers.
- 10.1.25 **Handling Customer Complaints:** Banks establish mechanisms in their Head Offices for handling customer complaints, in process of investigation, evaluation and resolution. They investigate the reasons behind customer complaints and take required measures to avoid their repetition.
- 10.1.26 **Security:** Banks agree that, apart from the measures taken for physical protection of customers and service media of the bank against all negative factors, the "Security" concept incorporates protection of customers against all infringements that could cause technical damages to the services rendered. With their services developing along the lines of technologic advancements and electronic banking, banks will take all technical and legal measures required for the security of processes involved in all service media and different service channels against victimization of customers.

- 10.1.27 **Banks' Relations with their Employees:** Banks pay particular attention on hiring employees who would work with a self-esteem that suits to the banking society, carrying the required knowledge, experience and sense of responsibility.

10.2 Recruitment and Career Development:

- 10.2.1 Banks take care to observe equal opportunity in the recruitment and career development of all their employees without any discrimination.
- 10.2.2 Acting on the principle of making best use of human resources, banks provide support to their employees by training, courses, seminars and similar facilities for the purposes of having their employees attain the information level required by contemporary business world and the banking profession.
- 10.2.3 Besides the knowledge, competency and personal achievement of the employees, affecting the decisions for promotion, banks must also consider the compliance of their employees with the code of banking ethics.

- 10.3 **Employees' Work Esteem:** Through internal policy and procedures, banks guide their employees to have a presentable outlook and esteem of the banking profession. Banks take measures to increase the motivation of employees, provide them good working conditions in line with health and safety requirements. Banks take care to employ adequate number of employees according to the intensity of work, organize the job responsibilities for maximum productivity, spend maximum effort not to exceed standard work hours, and ensure that employees can get annual leaves as scheduled.

11 CHAPTER-XI: ENSURING COMPLIANCE WITH GENERAL RULES AND ETHICAL CODE OF CONDUCT

The bank shall ensure strong compliance culture with General Rules of Conduct and Ethical Code of Conduct. Even an employee at the lowest stage shall be empowered to speak up without the fear of reprisal if he/she identifies something unethical. Beside this:

- 11.1 The board of directors, the senior management and the "EXIM Bank Morality Committee" will promote a high ethical and integrity culture in the bank.
- 11.2 The board of directors, the senior management and the "EXIM Bank Morality Committee" will establish a culture of compliance with the National Integrity Strategy of Bangladesh.
- 11.3 The board of directors, the senior management and the "EXIM Bank Morality Committee" will establish a culture of compliance with 'General Rules of Conduct' and 'Ethical Code of Conduct'.

12. CHAPTER -XII: GENERAL RULES OF CONDUCT

General Rules of Conduct mentioned in Chapter-VIII of “The Service Rules for the Employees of the Export Import Bank of Bangladesh Limited” must be followed meticulously. The rules are as follows:

- 12.1 Every employee shall continue to remain in service as whole time staff of the Bank and shall not remain absent or leave office without prior permission of the competent authority.
- 12.2 Every employee shall serve the bank honestly, sincerely, diligently and with utmost dedication. He must sub-ordinate all personal interest to the interest of the Bank. He shall serve the bank to the best of his skill & ability and in all respect conform to the rules and regulations of the Bank.
- 12.3 Every employee shall maintain strictest secrecy of the affairs of the Bank and also the affairs of the customer’s account and shall not communicate directly or indirectly to press, public or any other agencies any information or document which will come to his knowledge and possession in the ordinary course of his official duty or assignment unless otherwise directed.
- 12.4 No employee of the Bank shall:
 - 12.4.1 Enter into any speculative transactions of dealings in shares, securities or otherwise whatsoever.
 - 12.4.2 Engage himself in gambling, racing, betting or wagering contracts.
 - 12.4.3 Engage himself in any kind of business whatsoever, If any one of his relative (Father/Brother/Sister/Sons/Daughter) have any interest in any loan account shall be declared to the Board.
 - 12.4.4 Participate in any political and subversive activities.
 - 12.4.5 Accepts any gifts or presents from any customers or prospective customers of the Bank or their relative.
 - 12.4.6 Remain absent from duty without obtaining sanction of leave.
 - 12.4.7 Engage himself in any kind of office of profit and business.
 - 12.4.8 Act as agent of insurance company or business firm directly or indirectly.
 - 12.4.9 Borrow money from any customer or any person having dealing with the Bank.

- 12.4.10 Overdraw the account of himself, his wife, children and relatives or any other benami account.
- 12.4.11 Make personal representation to any director, Managing Director or Chairman directly. Any kind of representation must be routed through proper channel. Make any attempt to influence any director in any manner on Bank affairs.
- 12.4.12 Participate in any political activities directly or indirectly, which may prejudice the interest of the Bank.
- 12.4.13 Issue any advance to customers in contravention of credit restrictions imposed by Head Office or Bangladesh Bank in excess of his authority.
- 12.4.14 Make any advance or contribution for political purpose.
- 12.4.15 Leave office even after usual office hour without completing daily balancing of account or specified work for the day.
- 12.4.16 Invest money in the business of the Bank's clients.
- 12.4.17 Do any activity which may undermine the prestige or image of the Bank or making/joining any organization which is not permitted by law.
- 12.5 Every employee of the Bank shall keep in mind that more facilities are dependent on increasing income and avoidance of wastage of drainage of resources.
- 12.6 Every employee of the Bank shall behave with decorum and decency with other employees and customers of the Bank during office hours and at other time.
- 12.7 Every employee shall faithfully and duly carry out all proper orders and instructions of the Bank and obey and observe all regulations applicable to employees and prescribed by competent authority.
- 12.8 Every employee shall abide by leave rules, travelling rules and other orders and rules prescribed by the competent authority.
- 12.9 Every employee shall faithfully and punctually account to the bank or to his immediate superior officers for all monies, drafts, securities, account books, registers, papers vouchers, writings, goods, chattels of other property which the employee may receive on behalf of the Bank or on account of the Bank.
- 12.10 Violation or acting adversely to any of the above shall be punishable up to dismissal and as permissible under existing law of the country. Every employee shall sign the form of declaration of fidelity and secrecy.

- 12.11 An employee, other than an employee under a contract of service with the Bank, shall be bound to give 3 (three) months' notice in writing to the Managing Director or surrender 3 (three) months' basic pay in lieu thereof for tendering his resignation from the service of the Bank. The Managing Director may, however, waive the notice pay to be surrendered at his discretion.
- 12.12 The Bank shall be entitled to terminate service of an employee, other than an employee under a contract, on giving him three calendar months' notice writing expiring with the last day of the following calendar month without assigning any reason for termination of his services provided always if an employee shall be guilty of any personal misconduct or of any willful breach or continued neglect of the terms of his service or the rules or the duties which may from time to time be assigned to him or if he is found guilty of any act of dishonesty, insubordination, indiscipline, subversion (of which neglect, breach, misconduct or act of indiscipline, the bank shall be the sole judge) the Bank may in writing forthwith and without any previous notice or payment in lieu of notice period, terminate the employment of the employees and in such case, the employee shall be paid the amount of his salary which may be due to him down to the date of termination of his service by writing as aforesaid and such amount shall be received by him in full satisfaction and discharge of all claims and demands whatsoever against the Bank in respect of his service with the Bank. Nothing contained in this rule shall prejudice the right of the bank to recover from the employees or their guarantors, if any amount due to the bank by reason of any act or omission on the part of an employee resulting in loss or damage to the Bank.
- 12.13 Any notice required to be given to an employee shall be deemed sufficiently serve upon him by being delivered to him personally or sent to him by post addressed to him at the address supplied by him to the Bank as his residential address any / every such notice so sent shall be deemed to have been received by the employee in due course of post.

13. CHAPTER -XIII: ETHICAL CODE OF CONDUCT

- 13.1 Ethical code of Conduct for the employees of EXIM Bank has been adopted to assist employees in understanding the difference between 'right' and 'wrong' and in applying that understanding to their decisions.
- 13.2 All the employees of EXIM Bank shall –
- 13.2.1 Place the integrity of the profession and the interests of the clients above the interests of them;
- 13.2.2 Act with integrity, competence, and respect.

- 13.2.3 Maintain and develop professionalism and integrity in banking transactions.
- 13.2.4 Remain free from associations and activities that may compromise integrity or damage credibility of the bank.
- 13.2.5 Not engage in any acts of frauds, forgeries and thefts.
- 13.2.6 Not misrepresent the health status for absence
- 13.2.7 Avoid self-dealings and political involvement.
- 13.2.8 Safeguard confidential information.
- 13.2.9 Never use confidential information for personal gain or abuse of office held.
- 13.2.10 Maintain books and records of accounts with scrupulous integrity conforming to the highest acceptance accounting standards reflecting in an accurate and timely manner all transactions of business in adherence to legal requirements.
- 13.2.11 Ensure the reliability and integrity of internal accounting information and customer records.
- 13.2.12 Comply with the internal control procedures established by the bank for the safeguarding of assets and proper reporting and disclosure of financial information.
- 13.2.13 Require to respond honestly and candidly when dealing with internal auditors, independent auditors, regulators and attorneys.
- 13.2.14 Be aware of all applicable laws and regulations abided by our bank.
- 13.2.15 Adhere to generally accepted principles of honesty, integrity and individual attitude to uphold the mutual trust and public confidence bestowed upon them.
- 13.2.16 Be fair minded in behavior and approach in their day to day dealings both in office and during their social interactions.
- 13.2.17 Be obliged to acquire necessary skills and knowledge to undertake a task in a professional way.
- 13.2.18 Develop and maintain constructive dialogue with colleagues and seek help and advice from appropriate colleagues when difficulties arise in matters of judgment.
- 13.2.19 Avoid conflict between private self-interest and the interests of the employer and customer.

- 13.2.20 Avoid participating in any business activity outside the bank which would deprive the employer of the employees' best efforts on the job or interfere with the independent exercise of judgment.
- 13.2.21 Avoid converting to own use any resource not personally owned or approved for such use by the employer.
- 13.2.22 Avoid acceptance of gifts, services, or hospitality that would affect or be interpreted by an ordinary sound person as receiving bribe, kick back or questionable payment.
- 13.2.23 Restrict access to any confidential or sensitive documents to only those authorised to handle such information.
- 13.2.24 Safeguard and respect the rights of colleagues to privacy on their personal affairs except when the interest of employer, customer, or common good would be at risk.
- 13.2.25 Maintain and promote the good standing of the bank and the profession both within and outside the country in addition to defending the same against unfair or unwarranted criticism.
- 13.2.26 Ensure that all business transactions are in compliance with the accepted traditions and requirements so as to avoid any actions which might be translated to be associated with or regarded as supportive of illegal or criminal activities such as money laundering.
- 13.2.27 Ensure gender inclusive environment and to ensure safe and healthy working environment for our women employee "Female Employees' Interest Protection Policy" of our bank will be implemented under strict compliance.

14. CHAPTER -XIV: ETHICAL ISSUES IN INFORMATION TECHNOLOGY

- 14.1 The following issues are to be addressed by maintaining *ICT guidelines of EXIM Bank* –
 - 14.1.1 Before leaving a desktop or laptop unattended, users shall apply the "Lock Workstation" feature. Desktop and laptop computers and monitors shall be turned off at the end of each workday.
 - 14.1.2 To access all desktops and laptops all users must have a unique user ID and a valid password which must not be same.
 - 14.1.3 Passwords shall not be shared or divulged. Passwords must not be inserted into email messages or other forms of electronic communication. All passwords must be at least eight characters long with alphanumeric signs for general users and with alphanumeric signs plus special character symbols [!@#% ^&*()_+ | ~=\ ' {} [] : " ; ' < > ? , . /]

- 14.1.4 Utmost care is needed for all user-level passwords (e.g., email, web, desktop computer, etc.) They must be changed at least every three months.
- 14.1.5 All passwords shall be promptly changed if they are suspected of / are being compromised
- 14.1.6 Computer users are prohibited from capturing or otherwise obtaining passwords, decryption keys, or any other access control mechanism, which could permit unauthorized access.
- 14.1.7 Users should be careful about spreading virus. Any kind of viruses shall be reported immediately. Viruses shall not be deleted without expert assistance unless otherwise instructed.
- 14.1.8 Users shall not intentionally write, generate, copy, propagate, execute or involve in introducing computer viruses or malicious codes.
- 14.1.9 All users should be cautious when opening e-mails and attachments from unknown sources as they may be infected with viruses.
- 14.1.10 Users shall not disclose to any unauthorized persons the nature and location of the Information Systems, and the information system controls that are in use or the way in which they are implemented.
- 14.1.11 Internal network addresses, configurations and related system or network information shall not be publicly disclosed.
- 14.1.12 Access to the Internet is provided only for banking business purposes and must not be abused for personal use. Users should not connect to the Internet via a dial-up ISP account on bank's computers connected to the network.
- 14.1.13 Users are expected to act ethically and responsibly in their use of the Internet and to comply with the relevant national legislation, the bank's Information Security policy, regulations and codes of practice. Users must not post messages on newsgroups or chat areas that are likely to be considered abusive, offensive or inflammatory by others.
- 14.1.14 Users must not use the bank's Internet connection to scan or attack other individuals/devices/organizations. The use of port scanners or other hacking tools is strictly prohibited.
- 14.1.15 Computer users are prohibited from connecting workstations to external network by means of communication device, such as dial-up modem, wireless interface, or broadband link, if the workstations are simultaneously connected to a local area network (LAN) or another internal communication network, unless with the approval of the Head of IT.

- 14.1.16 Computer users shall not connect any unauthorized Information System device to bank's Information System without prior approval of Head of ITD.
- 14.1.17 Connecting privately owned computer resources to bank's internal network requires approval from Head of ITD.
- 14.1.18 Users are expected to act ethically and responsibly in their use of e-mails and to comply with the relevant national legislation, bank's ICT policy, regulations and codes of practice.
- 14.1.19 Users shall not use profanities, obscenities or derogatory remarks in e-mail messages regarding employees, customers, competitors, or others.
- 14.1.20 All users should do their best to ensure that email content is accurate, factual and objective especially in relation to individuals. Users should avoid subjective opinions about individuals or other organizations.
- 14.1.21 Users should be aware that e-mails could easily be forwarded to other parties. Users should assume that anyone mentioned in e-mail could see it or hear about it or he/she may, under data protection or other law, be entitled to see it.
- 14.1.22 Individual users must not install or download software applications and/or executable files to any desktop or laptop computer without prior authorization. Users must not create or forward advertisements, chain letters or unsolicited e-mails e.g. SPAM.
- 14.1.23 Discrimination, victimization or harassment on the grounds of gender, marital status, family status, sexual orientation, religious belief, age, disability, race, color, nationality, ethnic or national origin is against the bank's Policy. Users must not bully, hassle or harass other individuals via e-mail. Users must not send messages that are likely to be considered abusive, offensive or inflammatory by the recipient/s.
- 14.1.24 All network or systems software malfunctions, information security alerts, warnings, suspected vulnerabilities, and the like, and suspected network security problems, shall be reported immediately only to the responsible party according to the incident handling procedure.
- 14.1.25 The banks' computers should be strictly restricted only to authorized users to use portable storage devices like pen / flash drives, CD / DVD drives etc. Other general users should not use any such portable devices.
- 14.2 **Things to be done –**
- 14.2.1 Employee should change their password at regular intervals (within 30 to 90 days cycle).

- 14.2.2 Employee should choose a password that's hard to crack and MUST use a mix of different characters i.e. numbers, capital letters, lowercase letters and punctuation, especially unusual punctuation marks.
- 14.2.3 Employee should use a different password for each of their accounts and MUST remember those, but no-one else can guess it.
- 14.2.4 Employee should lock your computer when they aren't using it and MUST take backup important files on a regular basis.
- 14.2.5 Employee should make environment of awareness to protect Debit Card or Credit Card PIN-i.e. paying caution to the ATM location & surroundings, Shielding hand while entering PIN, Ensuring that no one is peeking or shoulder surfing while entering PIN.
- 14.2.6 Employee should make environment of awareness to avoid ATM frauds i.e.to avoid isolated locations, Preference to ATM machines near Bank Branch, Examining the ATM equipment carefully for any skimming devices, Looking for 'extra' cameras other than general ATM security camera.
- 14.2.7 Employee should make environment of awareness for checking account statements, looking for unusual transactions regularly and immediate reporting unfamiliar items to the bank.
- 14.3 **Things not to be done –**
- 14.3.1 Employee should not- download files from unknown sources, open unknown or unexpected email attachments, send confidential information via email or reply to unsolicited email messages (SPAM) any email offering prizes sounds too good to be true.
- 14.3.2 Employee should provide personal information or information about EXIM Bank, including its structure or networks, unless they are certain of a person's authority to have the information.

15. CHAPTER-XV: CHALLENGES, GOAL, RECOMMENDATIONS AND ACTION PLAN RELATED TO OUR BANK MENTIONED IN NATIONAL INTEGRITY STRATEGY

15.1 The main challenges are –

- 15.1.1 Addressing of the loan-default problem;
- 15.1.2 Promotion of corporate governance;
- 15.1.3 Awarding of performance-based fair salary and wages to the employees;
- 15.1.4 Proper enforcement of the laws on consumer rights and bankruptcy;
- 15.1.5 Prevention of collusive practices in business by enforcing the Competition Act;
- 15.1.6 Promotion of a culture of self-control by Chambers and Associations.

15.2 **Goal**—Establishment of the private industrial and commercial enterprises as a transparent sector committed to people’s socio-economic development.

15.3 Recommendations –

15.3.1 **Short-term Recommendation:** Effective enforcement of the Bankruptcy Act and Clients & Depositors Protection Act.

15.3.2 Medium and long-term Recommendations:

- 15.3.2.1 Strengthening the activities of key government organizations mandated to promote business, like Export Promotion Bureau and National Productivity Centre;
- 15.3.2.2 Introduction of standardized practices by Chambers and Associations for promotion of self-regulation with respect to non-monopolistic pricing, environmental protection, labour law and minimum wages;
- 15.3.2.3 Introduction of rewards for ‘champions of integrity’ (organizations and persons) in the business sector;
- 15.3.2.4 Proper enforcement of tax laws by encouraging the business organizations to pay taxes.
- 15.3.2.5 Setting up of ‘National Commercial Competitive Council’;
- 15.3.2.6 Strengthening the legal and administrative structure to prevent winning of business contracts through unethical means;
- 15.3.2.7 Rehabilitation of industries turning sick owing to factors beyond their control.

15.4 Action Plan –

SL	Interventions	Performance Indicators	Time-frame	Responsibility of	Supported by
1.	Strengthening of self-control in business	Chambers and Associations ensure compliance of rules and regulations, and take remedial measures against violators	Continuous	Chambers and Associations; Business entities	Business Companies
2.	Strict enforcement of bankruptcy law against loan defaulters	Cases lodged and their disposal sped up	Continuous	Bangladesh Bank; Financial institutions	Chambers and Associations; Bank and Financial Institutions Division
3.	Proper enforcement of Competition Act	‘National Competition Commission’ established and operational	Short term	M/o Commerce	Business Associations
4.	Enforcement of sanctions against violators of corporate governance	Corporate houses not complying with transparent principles prosecuted	Continuous	BSEC	Finance Division
5.	Reaching at agreement by the business houses, Government and trade unions on payment of fair and performance-based wages and benefits	Incidence of violence and conflict in the business and industrial sector decreased	Continuous	M/o Commerce	M/o Industries; Chambers and Associations
6.	Motivate business establishments for payment of due taxes regularly	Payment of taxes by business establishments increased	Continuous	National Board of Revenue	M/o Commerce; business establishments
7.	Strict enforcement of Consumer Rights Act	Satisfaction of the consumers	Continuous	M/o Commerce	M/o Commerce; business establishments
8.	Setting-up of legal structure for regulation of multi-level marketing business	New law promulgated and enforced	Short term	M/o Commerce	M/o Home Affairs
9.	Strengthening the activities of ‘Micro-credit Regulatory Authority’	Enhanced transparency achieved in micro-credit operations	Continuous	Bangladesh Bank	NGO Affairs Bureau
10.	Strengthening the activities of ‘Insurance Development and Regulatory Authority (IDRA)’	Extent and transparency of Insurance activities increased	Continuous	M/o Commerce	Finance Division

16. CHAPTER -XVI: COMPLIANCE WITH RULES OF BUSINESS IN EXIM BANK

- 16.1 All the employees of EXIM Bank must comply with the policies or guidelines related to their operational areas of the banks in general and of the EXIM Bank in particular.
- 16.2 Employee should follow Bangladesh Bank's circulars and prudential guidelines regarding Core Risk Management, Asset-Liability Management, Prevention of Money Laundering, Foreign Exchange Risk Management, Internal Control & Compliance, ICT, BASEL compliance, Green Banking and any other issues which will be the guidelines of our banking operations as well.
- 16.3 Employee should abide by the circulars, policies and guidelines introduced by EXIM Bank in line of Bangladesh Bank mandatorily. The policy Guidelines/Manuals of EXIM Bank are as follows—
- 16.3.1 "EXIM Bank Manual for Prevention of Money Laundering"
- 16.3.2 "EXIM Islami Investment Policy"
- 16.3.3 EXIM Bank's "Foreign Exchange Manual"
- 16.3.4 EXIM Bank's "Policy Guideline for Environmental Risk Management/Green Banking"
- 16.3.5 EXIM Bank's "Internal Control & Compliance Policy/Manual"
- 16.3.6 EXIM Bank's "Investment Policy and Control Guidelines"
- 16.3.7 EXIM Bank's "ICT Policy/Manual"
- 16.3.8 EXIM Bank's "General Banking Operation Manual"
- 16.3.9 EXIM Bank's "Investment Operation Manual"

17. CHAPTER-XVII: OTHER IMPORTANT ISSUES

- 17.1 Every employee should seek guidance if he/she is unsure of what to do. All the employees are also advised to ask questions and report wrongdoing.
- 17.2 This policy strictly forbids any retaliation against an employee who reports suspected wrongdoing.
- 17.3 Violations of the *General Rules of Conduct* and the *Ethical Code of Conduct* can lead to disciplinary action up to and including termination of employment.
- 17.4 Disciplinary action may also be taken against Integrity Coordinators or Executives, who condone, permit or have knowledge of improper conduct or fail to take action to prevent and detect violations, such as failure to provide training and failure to supervise subordinates' work.
- 17.5 No one may justify an illegal or improper act by claiming it was ordered by someone in higher management.

- 17.6 If an employee has doubts about any aspect of this Integrity Strategy, he or she must seek clarification from his or her manager or directly from the members of “EXIM Bank Morality Committee”, Head Office.

18. CHAPTER -XVIII: IMPLEMENTATION PROCEDURES

- 18.1 “EXIM Bank Morality Committee” has been formed to administer the integrity issues of our bank. This team will lead the subsidiary committees in different branches and offices so that all employees can be governed under the same policy umbrella.
- 18.2 “EXIM Bank Morality Committee” will act as the liaison making body which is responsible for communicating to and from Bangladesh Bank and other government bodies regarding this issue.
- 18.3 All the employees will be motivated and rejuvenated by at least two workshops yearly from now on. Also, all the training programs will integrate issues related ethics and morality in Banking.
- 18.4 Inter Bank/Organizational sharing of knowhow and experience regarding integrity issues will be addressed through workshops for top level executives.
- 18.5 Exim Bank will strive for best practiced behaviors and values within the industry based on ethics and integrity.
- 18.6 Any complaint regarding the integrity issue of an employee shall be referred to the Head of the “EXIM Bank Morality Committee” in writing directly by any of EXIM employees. The complaint can either be taken into account for further perusal or be refused directly.
- 18.7 Any person(s) with fairly close connection can file a complaint to the Head of the “EXIM Bank Morality Committee” in writing with considerable evidence.
- 18.8 Any complaint regarding the conduct of an employee shall be referred in the first instance to the Head of the “EXIM Bank Morality Committee” who, if satisfied that the matter involves only a minor breach of the regulations, may either admonish the employee concerned or determine that no further action shall be taken.
- 18.9 The Committee shall recommend to the competent authority to consider the case of an employee who may be accused of impropriety of conduct and therefore determine what action(s) and measure(s) should be taken.
- 18.9.1 Following the reference of complaint under the previous rule 18.9 above, an Investigating Committee shall be appointed by the competent authority as per *The Service Rules for the Employee of Exim Bank*.

19. CHAPTER-XIX: CONCLUSION

It is not possible to describe all ethical business practices in detail. The best guidelines are individual conscience, common sense and unwavering compliance with all other policies, applicable laws, regulations and obligations of the Bank.

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