



Code of Conduct

July 2022

2022

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1. Introduction

The Code of Conduct sets out the standards of behavior expected from all staff. Providing staff, senior management, and the BoD with a comprehensive frame of reference regarding their rights and duties. The code further enshrines the principles of equal employment opportunity such as gender equality. It is the staff responsibility at all levels to recognize and fully understand the governance of the Code within the Bank. It is expected that staff act in full compliance with the Code.

2. General Ethics

2.1 Work Environment

- a) The Bank ensures compliance with the Egyptian labor and employment laws, including equal employment opportunities, policies and procedures, safety and health programs, wages and working hours' procedures;
- b) Staff sharing a common area with others must respect coworkers to ensure an acceptable work environment and allow them to perform their duties.

2.2 Environmental Management and Compliance

- a) CIB demonstrates its corporate leadership by, inter alia, sustaining a healthy, clean and safe environment for all its staff, rooted in a combination of statutory regulation and self-regulation;
- b) The Bank is committed to implementing sound environmental management systems based on a set of cohesive elements and best environmental practices that CIB continues to adopt to protect the environment. High on the agenda is energy efficiency, water conservation, reduction of greenhouse gas emissions and waste minimization and disposal;
- c) In compliance with Egypt's Law No. 4 for 1994, smoking is not allowed in open shared areas or during closed meetings. Those who wish to smoke should do so in strictly designated areas or in closed offices as stipulated by the Bank;
- d) CIB considers environmental sensitivity an important component of its various financial and business transactions;
- e) The Bank promotes an environment friendly culture through a healthy dialogue, shared commitments, positive behavior and a common vision;
- f) Based on its genuine interest and belief in corporate social and environmental responsibility, the Bank supports a business atmosphere in which entrepreneurs and enterprises can flourish and where societies can develop in a socially and environmentally responsible manner.

2.3 Management Leadership

- a) The Bank is expecting managers to seek ideas of subordinates and involve them in decisions whenever appropriate;
- b) Managers must act as role models for all staff and they are responsible to exhibit the highest standard of integrity upon dealing with colleagues, clients, suppliers and the community at large by virtue of their position of authority;
- c) Managers are responsible to develop their subordinates through continuous training, coaching, and delegating through proper succession plans;
- d) Managers are requested to allow good calibers under their supervision to move to other areas of the Bank, as appropriate to gain the required experience and assist them to build their career path within the Bank;
- e) Managers must exercise their leadership to preserve the work environment.

2.4 Treatment of Staff

- a) One of CIB's most significant values is treating staff with respect and dignity;
- b) Staff are requested to treat employees under their supervision in the same manner that they like to be treated;
- c) Staff are not allowed to use improper or foul language at any point in time;
- d) Staff to assess and be assessed according to performance, merits and competence not according to personal relations.
- e) Mutual respect is the foundation to developing trust and teamwork; disrespectful behavior is not tolerated.

2.5 Staff Equal Opportunities

- a) The Bank is committed to fair employment practices, equal employment opportunities and unbiased treatment of all individuals, based on job related qualifications and without regard to any classification by gender, race, religion, age, disability and marital status;
- b) The Bank is committed to announce to all staff the vacant positions in different areas of the Bank, to submit their joining request if they meet the required criteria and based on their performance.

2.6 Staff Harassment, Intimidation and Discrimination

- a) The Bank prohibits any kind of harassment or intimidation whether committed by or against a supervisor, colleague, client or his representative, vendor or any person dealing with the Bank to preserve a respectful professional and dignified workplace and the Workplace Anti-Harassment Policy provides more details in this respect;
- b) The Bank prohibits all kinds of discrimination among its staff;
- c) Staff must report complaints regarding harassment, including offensive behavior to individuals or intimidation to the Staff Issues Committee for investigation of allegations of harassment or discrimination and for appropriate corrective actions.
- d) Employee can report or make any complaint about any harassment without revealing their identity through sending an e-mail to the whistleblowing email (CIB.Whistleblowing@cibeg.com) or the whistleblowing hotline (2220).

2.7 Staff Behavior and Attitude

Staff are requested to perform according to the following standards, and it's the role of senior management and directors of the Bank to ensure adherence;

- a) Maintain proper appearance and dignity both inside and outside the Bank. Staff should bear in mind that they are representing CIB at all times;
- b) Abide by CIB Dress Code definition. They should maintain a corporate dress code while at work and during meetings with clients or business partners, even during casual days. It is the responsibility of the managers and department heads to ensure that staff under their supervision are abiding to the dress code. Any member of management or senior management levels has the right to intervene in case it was noticed that a staff member was not abiding to the dress code, and even if the staff is not under his/her direct supervision;
- c) Maintain honesty and integrity being the fundamentals of ethical behavior;
- d) Maintain the Bank ID card in possession at all times inside the Bank, report its loss to the Security Department promptly and return it back to the Bank upon resignation;
- e) Abide by and make use of the full working hours, perform accurately and honestly to achieve the Bank's goals;
- f) No casual gatherings in corridors and Bank premises during the working hours;
- g) Not to leave the work place or be absent during the working hours, except for valid reasons and upon authorization by the supervisor;
- h) No admittance in restricted areas such as Bank's safes/vaults and computer sites or data centers unless authorized;
- i) Ensure that all documents/files containing confidential or proprietary information are kept secured prior to leaving the Bank's premises;
- j) Ensure that computers and Bank's telephone sets are logged off, and drawers are locked prior to leaving the Bank's premises;
- k) Understand that all techniques, products or services used or developed by the staff during their service in the Bank are considered sole CIB property;
- l) Strictly prohibited to maintain any corporate account nor to be granted any credit facility for the relevant external activity (business/non-business) if any;
- m) Staff shall not use their accounts (either payroll or personal) in commercial / business related transactions;
- n) Not using the staff accounts (either payroll or personal) on behalf of third party i.e. persons other than first degree relatives;
- o) Not to hold a power of attorney (PoA) / non-financial delegations or open joint / care accounts with clients, unless this client is a first or second degree relative, and after obtaining the governance group approval;
- p) Not to establish any business relationship or commercial interest with any of CIB clients;

- q) Not to authorize any transaction to him/her-self, or any of his/her relatives;
- r) Not to be the accountable officer of his relatives' accounts;
- s) Declare to the Head of Corporate Governance or his/her delegate and Staff Accounts Monitoring Unit large deposited funds and provide supporting documents if requested;
- t) Access to the clients or the staff accounts for non-business purposes is prohibited;
- u) Maintain strict confidentiality of information related to activities of the Bank, clients, service providers or business partners;
 - v) If the staff is stating on his/her profile on any social media platform that he/she is a CIB staff, he/she must clearly post on his/her profile the disclaimer dictated by the HR for this purpose *"My views expressed on this platform are my own and do not in any way represent CIB's positions, strategies, or opinions"*;
 - w) Staff are not allowed to have bounced checks, overdrawn accounts, and late payments of facilities. And if any occurred more than once, the concerned department is to report the violating staff to his direct manager and the Head of Corporate Governance or his/her delegate;
 - x) Customer/guest reception is not permitted in staff restricted locations, and their hosting is to be limited to customers designated areas;
 - y) Staff are fully dedicated to the Bank; as the Bank should enjoy the full contribution, time and energy of its staff.
- z) Virtual Communication Etiquette:
 - o Embrace the highest level of business ethics within any online communication platform;
 - o Taking/Sharing screenshots of virtual meetings is not allowed;
 - o Disclosing to the other meeting/call participants if someone is attending the meeting/call with you using your device and not logged-in from his/her own device;
 - o Adhering to the proper dress code;
 - o Choosing an appropriate location;
 - o Using the right tone throughout the meeting;
 - o Respecting others' opinions and views;
 - o Giving space to listen to the other meeting participants.

2.8 Board of Directors and Executive Management

In addition to what is stipulated in this policy, the Board of Directors and Executive Management are requested to show the highest level of commitment and ethical behavior by adhering to the following:

- a) Comply with the prevailing laws, regulations and provisions;
- b) Exert due diligence in accordance with technical and professional principles;
- c) Cooperate with the regulators with credibility and transparency;
- d) Inform CBE of any serious violations in the bank;
- e) Verify that the work within their responsibilities is carried out efficiently and effectively in accordance with applicable laws, regulations and instructions;

- f) Take into account that the delegation of their responsibilities is to persons who have the competence and authority for the tasks delegated to them, without disclaiming their responsibility for those actions;
- g) Exercise due diligence to protect the interests of clients and treat them in a fair manner;
- h) Observe disclosure and transparency in making the necessary information available to clients;
- i) Work on preventing any conflict of interest acts.

3. Disclosure

Staff are required to disclose the following to their direct manager, then seek the Governance guidance/approval:

- a) If staff is a partner or shareholder of any company or has any external business / non-business activity;
- b) If staff has POA, joint account, care account, non-financial delegation on any account;
- c) If staff has family members working within the Bank;
- d) If staff has immediate family members occupying influential positions with competitive institutions;
- e) If staff has immediate family members dealing with the Bank in any kind of business for example, but not limited to, being a service provider or contractor.

4. Reportable Actual and Potential Violations

Although staff should respect the organization structure, “Whistle Blowing” at all levels is encouraged. All staff are responsible for reporting to the Chief Compliance Officer &/or Whistleblowing Manager any information they may have about any of the following “Reportable Violations”, in a discretionary manner. The Whistle Blowing Policy is an integral part of the Code and provides more details.

- a) Any act against the Bank causing loss, potential loss or damage to the Bank’s assets, image or reputation in any manner;
- b) Any known or suspected violation or pattern of violations against the Bank, indicating potential external or internal fraud;
- c) Any completed or attempted transaction(s) suggestive of structuring and / or money laundering. See details as per point (9) of the code;
- d) Any known or suspected misconduct on the part of the Bank’s staff, director or officer including staff that perform financial activities under the Bank license whether or not a criminal offense, involving theft, embezzlement, self-dealing, alteration of Bank’s records, dishonesty, breach of trust, intentional misuse of proprietary or client information or a serious breach of the Bank Policy;

- e) Any complaints or allegations against staff members;
- f) Any knowledge of staff financial problems that might indulge the staff in matters related to integrity, honesty and reliability;
- g) Any client or Bank activity that violates or potentially violates any regulations or provisions including the Central Bank Law no. 194 for the year 2020, or CIB internal policies or guidelines;
- h) Any attempted or effected transaction from a client or a non-client through the Bank, which appears to have no legitimate business purpose and differs from the standard methods or is out of pattern;
- i) According to article (140 & 142) of Law No. 194/2020, Non-routine requests for client data of transaction information made by anyone or authority other than the following:
 - Informational requests by CBE and Court made directly to the Bank;
 - CBE routine requests;
 - Requests made during routine audits or examinations;
 - Requests where the Bank has no responsive information, where no client is involved unless request relates to money laundering or financial fraud on the part of the Bank's client at any point in time.
- j) Where client may decide to close the account rather than providing the requested information;
- k) Any information from media or reliable sources that involves any staff or client's reputation, integrity or financial status.

5. Confidentiality

5.1 Client Information

Law No. 194 for the year 2020 sets forth the principles to safeguard the privacy, confidentiality and security of client data, which designates all clients' accounts, deposits and safe deposits as private.

- a) Staff are responsible to safeguard any information that client is sharing with the Bank according to strict standards of security and confidentiality as per applied in Third Section, Chapter Nine of law no. 194/2020;
- b) Staff are prohibited from disclosing any information whether directly or indirectly without written authorization from client, inheritors, authorized attorney, court order or arbitration order;
- c) Information represented in: personal data, information about merger or acquisition transactions, securities position, or any other material information are to be kept confidential.

5.2 Non-public Information

- a) Staff must ensure that business related paperwork and documents are secured with minimal access risk;
- b) Staff must practice extreme caution and not to disclose any information in public places;
- c) Upon receipt or disclose inappropriately of any confidential information to someone, staff must contact Governance Group for advice.

6. Conflict of Interest

Conflict of interest is defined as a situation where a staff or a board member is in position to derive direct/indirect personal benefit from actions or decisions made in his/her official capacity. The Conflict of Interest Policy is an integral part of the Code of Conduct and must be adhered to at all times. The policy addresses the staff's responsibilities to situations related to conflict of interests and how to mitigate it, what practices are not allowed for staff members, the controls for staff outside business activities, the gift acceptance criteria, and the hiring or transfer of staff relatives in the workplace. Staff must exercise extreme caution with any activities, interest or relationships that might interfere or appear to interfere with their ability to act in the best interest of the Bank and the clients, or between personal interests and the Bank's interests.

7. Personal Investments

Staff and their immediate family must not make personal investments including stocks and securities with enterprises that have business or seeking business with the Bank if the interest is significant or could impair the staff ability to act solely for the best interest of the Bank. Similar cases are to be reported to the Head of Corporate Governance for decision.

8. Media Communication

Any media interviews and other public appearances related to CIB are prohibited to all staff except for authorized spokesperson or through the Corporate Communication Department.

8.1 Material Non-public Information

- a) Material information is any information relating to the business and affairs of the Bank that results in or would reasonably be expected to result in, a significant change in the market price or value of the Bank's shares or that would reasonably be expected to have a significant influence on a reasonable investor's investment decisions.
- b) The material nonpublic information might include information about the following:
 - The operating or financial results of CIB including estimates of any future earnings or losses;
 - A pending acquisition or sale of a substantial business or other significant transactions;
 - Development of a new product or service;
 - An increase or decrease in dividends;
 - A stock split or other recapitalization;
 - A redemption or purchase by the Bank of its securities;
 - Major management changes.

- c) Staff must protect and not disclose, or request disclosure, the confidentiality of non-public information of CIB in form of: any system, process information, operations, results, earnings, projection, business plans, strategies, clients or client relationships, products or staff records such as salary, bonus or performance appraisal data. Such queries should be directed to the Chief HR Officer and/or the Chief Communications Officer.

8.2 Insider Trading and Blackout

- a) A blackout period is a period of time during which members of the Material Risk Takers (Insiders) List inclusive of the Board of Directors are not allowed to trade on the CIB stock (neither buy nor sell), either local shares, Global Depository Receipts (GDRs) or American Depository Receipts (ADRs). The blackout period usually takes place prior the financial statement release and/or the announcement of any other material non-public information or event. The duration of the blackout period is set in accordance with the local and foreign regulators and international best practices and is announced by the Head of Corporate Governance;
- b) Material Risk Takers (Insiders) List includes BoD and staff members (in addition to their spouses and minor children) with access to material non-public information and have functional responsibilities with significant potential impact / influence. The list is updated periodically or upon any change in staff status by transfer or resignation or similar event. It is prepared by the Governance Group and shared with the GNC;
- c) Trading in both CIB shares and GDRs/ADRs is allowed during non-blackout periods, on condition that it involves no speculation and is carried out within the approved policy guidelines set by the Bank to all staff;
- d) Staff with supervisory authority and access the material nonpublic information must familiarize all members of their working group that they possess and must preserve the confidential information and assure that it is prohibited to buy or sell securities during the blackout period;
- e) Account Officers, Relationship Managers and related management are also prohibited from trading (selling / purchasing) in securities of any company if a staff member believes that he/she has come into possession of inside information, they may not execute any trade on securities of the company. In case of doubt, they are to consult with the Head of Corporate Governance;
- f) Tipping off in the form of revealing material nonpublic information to anyone including family members whom in turn buy or sell securities or pass information to someone else that buys and sells securities is prohibited.

8.3 Prohibition of Price Manipulation

Manipulation of securities is absolutely prohibited according to the Capital Market Law No. 95/1992 and its decree 141/2006 represented in carrying out all or any of the following:

- a) Any dealing through execution of transactions leading to no change of the actual beneficiary and influencing the market or the price;
- b) Carrying out transactions pre-agreed upon with the aim of pretending that there is trading on the share;

- c) Publishing or assisting in the publication of misleading or unverified information;
- d) Publishing information related with upcoming change in the price of a security with the aim of influencing its price and dealing in it;
- e) The issuer's participation in trading on its securities in order to influence its price, or in a manner that may cause harm to any of its dealers, without prejudice to the provisions regulating the trade of treasury shares;
- f) Media announcement of incorrect or unverified information that is liable to affect the market or its dealers with the aim of realizing a personal benefit or in the favor of a specific person or entity;
- g) Carrying out transactions or placing orders in the trading systems of the Stock Exchange with the aim of pretending that there is trading on the shares or manipulating its prices for the purpose of facilitating sale or purchase;
- h) Participating in any agreements or practices that result in misleading or deceiving the investor or influencing or controlling prices of certain shares or the market in general;
- i) Placing orders, individually or jointly with others in the trading systems of the Stock Exchange for a specific security to:
 - Give a misleading or incorrect image of the volume of trade and liquidity, or the price of a specific security in the market;
 - Affect its price, whether by increasing, decreasing or pegging, to realize illicit targets, such as affecting the value of investments for personal benefit, tax evasion, or reaching a specific pre-agreed upon price with a third party to realize an illegal purpose, such as increasing a security price and use it as a collateral for a credit facility.
- j) Dissemination of false or misleading information about the market in order to move the prices of orders and executions towards a certain direction.

For more details, please refer to the Capital Market Law No.95/1992 and its decrees.

9. Anti-Money Laundering and Terrorism Finance

- a) It is the responsibility of each staff member to accurately and promptly report any suspicious or improper activity they may encounter while dealing with clients or handling transactions/requests and suspected to involve money laundering activity;
- b) Staff are requested not to indulge themselves in any act or transaction with suspicion of money laundering, whether directly or indirectly through assisting third party;
- c) Staff are strictly prohibited from disclosing to client or beneficiary any data or information related to investigating, examining and reporting any suspected cases for money laundering (Tipping Off);
- d) Upon approach by government authorities for records and information on clients, agents or service establishments, concerned staff must immediately contact the Chief Compliance Officer to ensure that such information shall not contradict with Third Section, Chapter No (9) "Accounts Secrecy" of Law No 194 for the year 2020.

10. Gifts and Business Entertainment

- a) A gift is anything of value that is offered to or accepted from a counterpart (i.e. any person our bank deals or potentially deals within the course of business for example, but not limited to, Customers, Vendors, Suppliers). Gifts can be of monetary or non-monetary nature and it must not be accepted in circumstances that might affect or influence the business judgment even if within the accepted threshold;
- b) Entertainment means all forms of corporate hospitality offered to or accepted from counterparts, including, but not limited to, travel, accommodation, social events, dinners and it must not be accepted in circumstances that might affect or influence the business judgment;
- c) Where no conflict of interest is detected, gifts may be accepted if refusal could offend a client and has a symbolic nature up to EGP 2,500 if they are non-cash. Near cash like gold coins are not to be accepted;
- d) In case the gift exceeds the limit and the counterpart insisted to offer the gift, an official letter should be issued thanking him / her for the gesture indicating that said gift should not be accepted as per the Bank policy and it will be considered as Bank asset as it exceeded the policy threshold. Then the gift to be sent to Fixed Assets department.
- e) Gifts may be offered to business associates or clients as courtesy of appreciation. Appropriate business entertainment by authorized staff may be offered to clients to create goodwill and sound working relationships. Such gifts should also be of symbolic nature and are capped to EGP 2,500;
- f) Control areas (risk, legal, compliance and audit), Procurement and Tendering staff are not allowed to receive any gifts from customers/suppliers;
- g) Both gifts given to and received from clients for amounts exceeding the equivalent of EGP 2,500 must be reported to the Head of Corporate Governance or his/her delegate decision;
- h) Gifts received from clients within the limit of EGP 2,500 must be reported to the staff's direct manager and group head, and a disciplinary action will be taken against the staff who fail to report such cases.
- i) Anti-Bribery and Corruption Policy (ABC) is an integral part of the Code.

11. Safeguarding Bank's Assets

- a) Staff should protect the Bank's assets in any form: cash, properties, administration tools, business plans, client information, computer programs, models, product details and written material;
- b) Staff should preserve Bank premises and ensure tidiness and cleanliness of areas in use;
- c) Managers are directly responsible for the locations under their supervision, overall it is the Bank's management responsibility to highlight any deficiencies in this regards;
- d) Staff are obliged to protect and use the Bank trademarks and copyrights properly and consistently ensuring that others do not take advantage of the Bank goodwill and brand investment;

- e) Staff should not transfer documents, records or papers outside the Bank and keep all records properly locked;
- f) Staff are prohibited from acting with dishonesty against the Bank involving theft, destruction or misappropriation of property, including money, office equipment or any other item of value.

12. Records and Financial Statements

- a) Staff are personally responsible for the accuracy and completeness of the records, data and information under their control. Records must be maintained in adequate details to reflect accurately the Banks' transactions, and must be retained according to the applied policies;
- b) Staff are required to fully cooperate with internal and external investigations as required. Making false or misleading statements may be considered as criminal act and result in severe penalties;
- c) It is strictly prohibited to destroy any records potentially relevant to a violation of law or any litigation or any pending government investigation or proceeding;
- d) Financial Statements must be prepared in accordance with the generally accepted accounting principles and standards and should properly reflect the Bank's results;

13. Customers' Rights Protection and Fair Competition

- a) In compliance with The Central Bank and Banking Sector law no. (194) for year 2020, Section no. (6) and Customer Rights Instructions issued on February 19th, 2019 by the CBE, the Bank has to, through all stages of its dealings with customers, observes that all of its treatments should be equal, just, fair and honest, and to take into account to make this approach an integral part of the Bank's governance rules.
- b) The Bank should pay more and special attention and care to customers with limited income brackets and those with limited education, the elderly, and customers with special needs without any gender discrimination;
- c) All institutions that sell similar or related products, or use similar or related supplies or services are considered competitors;
- d) Staff are committed to deal fairly with clients, competitors and colleagues;
- e) Staff must inform clients with details of the products and services without concealing any details, charges or penalties;
- f) Staff must also advise clients with the correct details of transactions affecting their accounts, thus ensuring proper understanding.

14. Bank Facilities, Data and Documentation Security

- a) The Bank's computers, telephone, e-mail and internet systems are primarily for business purposes and should not be misused. Personal usage of these systems should be kept to the minimum;
- b) Staff are prohibited from breaching the Bank's Computer System to remove, steal, affect funds or critical information to damage or affect the Bank's critical system, to commit fraud or for purpose against Bank policies and procedures;
- c) Bank forms, training materials, policies, procedures, guides, and manuals are for the business use only and are the sole proprietorship of the CIB and shouldn't be used outside the Bank's premises. The content of any of the previously mentioned, is forbidden to be reproduced, republished, redistributed or resold in whole or in part to any other party;
- d) Staff should strictly abide by policies and procedures of Information Governance Policy in this regard.

15. Violations of the Code of Conduct

- a) Every violation to any of the previously mentioned rules is to be referred to the Head of Corporate Governance or his/her delegate;
- b) Failure to comply with the Bank's Code of Conduct will result in disciplinary action up to termination of employment. The violation of the Code may also be a violation of the law and may ultimately result in civil or criminal penalties for staff committing such violations;
- c) Disciplinary action will apply to violating staff:
 - By committing, authorizing, approving, directing, or participating in the act;
 - By concealing or failing to report a known violation by oneself, subordinates, peers or seniors;
 - By known and proven direct or indirect retaliation against a staff member reporting a suspicion or actual violation of the Code.

16. Sustainability

This policy document aligns with and implements relevant Sustainability Environmental, Social & Governance (ESG) principles, standards, frameworks and best practices while adhering to applicable national laws and regulations. Furthermore, the policy shall observe and implement Sustainability System components as mentioned in the Sustainable Finance Policy and ensure that relevant Environmental, Social & Governance (ESG) indicators are well measured, monitored, controlled and reported consistently and comparably to enhance proper enforcement, accountability and transparency

17. Policy Governance

The Code of Conduct shall be concurred by the Management Committee "ManCom" and the Governance and Nomination Committee to be finally approved by the Board of Directors.

18. Policy Version Control

Issue Date	Version	Change History
October 2007	1.0 Initial Version	Initial Version
October 2014	2.0	
July 2018	3.0	
March 2021	4.0	
July 2022	5.0	