I&M BANK LTD.

STAFF CODE OF CONDUCT

SCOPE AND APPLICATION

The code of conduct shall apply to all members of staff, individually and/or collectively, in the Head Office, Branch network, on attachment or secondment, and in their private or official capacities.

INTEGRITY

An employee shall at all times maintain absolute integrity and honesty in the discharge of his/her duties or in the exercise of his/her powers.

STANDARD OF PERFORMANCE

An employee shall at all times discharge and perform his assignments, duties, obligations, in a manner and to a standard satisfactory and acceptable to the Bank.

PUNCTUALITY

Every employee shall punctually attend to his/her office and shall at all times endeavour to maintain a record of punctuality.

CANVASSING AND UNDUE INFLUENCE

No employee shall bring or attempt to bring any political or other influence or any person to bear upon any senior officer or superior authority to further his/her interest, or to gain any advantage in matters pertaining to his/her employment or service. Neither shall an employee associate or encourage or take part or participate in or with any association or group or employees whose objective is to bring pressure to bear upon any senior officer or superior authority.

OBEDIENCE

Every employee shall render prompt obedience to all persons placed in authority over him/her.

ACCEPTANCE OF GIFTS AND REWARDS

No employee shall directly or indirectly solicit or accept any gift, gratuity, or consideration or any pecuniary advantage, as an inducement or reward from outside parties for any act of omission to do anything in his/her official capacity, or for showing favour or disfavour to any person. Provided that an employee may, with the prior authority of the Human Resources (H/R) Committee be permitted to accept such gift or gratuity.

COLLECTIONS

No employee shall collect or solicit from other employees for subscription, donations or any other form of assistance for the benefit of himself, or another employee or any person or institution whatsoever, without the written authority of the H/R Committee.

UNAUTHORISED COMMUNICATION OF INFORMATION

No employee shall, except in accordance with any general or special authority or in performance in good faith of the duties assigned to him, communicate directly or indirectly, any article, official document, or part thereof, or the substance of such document or information which relates to the Bank, to a person not authorised to receive such articles, document, information as the case may be.

PECUNIARY EMBARRASSMENT

Every employee shall manage and conduct his financial affairs sensibly and responsibly. An employee is not expected to enter into too many financial commitments as these commitments may embarrass him/her during repayment of the facilities.

CONDUCT OF BANK ACCOUNT

It is expected that no employee will issue a cheque in favour of a third party without sufficient funds in the account to honour the payment of the cheque.

BORROWING AND LENDING MONEY

An employee shall not become the agent of a money lender or borrow any money from a money lender or any other person or institution; become or act as an agent of a principal or banking or money lending Institution; lend any money at an interest or commission or at cost; borrow money from another employee or from customers with whom his official duties bring him/her into contact; or accept premiums from other staff as consideration for instructing them in their duties.

BETTING, GAMBLING AND LOTTERY TICKETS

No employee shall take part in gambling or betting in any form, or act as a betting agent, or principal, or tipster, or tipster's agent for any race, football match, or similar sport or game, while still in the service of the Bank.

CONFLICT OF INTEREST

No employee shall subordinate his duty to his private interest, neither shall an employee put himself in a position where his duty and private interest conflict. No employee shall use his official position to further his private interest.

If, as a part of his duties, an employee is called upon to deal with any matter or issue in which he has personal interest, such an employee shall immediately disclose this to the H/R Committee.

TRADING

The Bank does not expect the services of an employee to be hired or enlisted for selling or purchasing merchandise. Likewise, an employee shall not conduct any business or unauthorised transactions whilst on duty or in Bank premises or Property registered in the name of, or leased by, the Bank.

CONSUMPTION OF INTOXICATING DRINKS AND DRUGS

No employee shall be under the influence of any intoxicating drinks, drugs or stimulants during the hours of duty, and every employee shall take due care that the performance of his/her duties is not and shall not at any time be affected in any way by the influence of such drinks, drugs or stimulants.

LEGAL PROCEEDINGS

No employee shall, without authority, make any official document which may come in his possession in the course of his duties, the subject of legal proceedings.

CONDUCT IN THE OFFICE

An employee is expected to be polite and obliging to his/her colleagues. He/she is also expected to present a neat and business-like appearance at all times when he/she is in the bank.

POLITICAL ACTIVITY

An employee will not be expected to take an active part in any political activity which, in the opinion of the bank is inconsistent with or reflects adversely upon the independence and impartiality required by his position. Those who may feel compelled, as private citizens, to take a public stand on any public matter should, in the first instance, consult the H/R Committee.

PRIVATE ACTIVITY

Every employee will be expected to conduct his private affairs or private life in such a way that he/she shall not embarrass or discredit the Bank.

CRIMINAL OFFENCES

It is a requirement of every appointment that an employee will not have committed, and that he/she will not commit any criminal offence, while in the employment of the Bank.

SECURITY OF PREMISES

An employee who suspects an attempt to steal, defraud or commit any act contrary to the interest of the Bank or its employees shall report the matter at once to his head of department, and the H/R Committee.

PLACE OF RESIDENCE

An employee shall be expected to reside within a reasonable distance of his place of work and the locality of residence will not in any circumstances be accepted as an excuse for irregular attendance or as sufficient reason for granting preferential hours of duty.

CHANGE OF NAME/NATIONALITY

If an employee has acquired a new name by marriage or deed poll, the employee shall forthwith inform the head of H/R of the new name in writing.

When an employee ceases to be a Kenyan citizen, whether by marriage or otherwise, such an employee shall immediately report the matter in writing to the head of H/R who shall seek the opinion of the H/R Committee whether the services of such an employee shall be terminated or not.

UNIFORMED STAFF

No employee who is in uniform shall appear on duty untidy or dirty in his person, or clothing. The said uniform shall be presentable at all times, when worn.

USE OF BANK TELEPHONE/ E-MAIL

Telephones – all telephones in the offices are for official use and should only be used privately if there are exceptional circumstances to justify. Telephone calls should not take unnecessarily long time and in any case should not exceed five minutes.

E-Mail – No personal business should be conducted using Bank's email. Junk e-mail, chain e-mail letters etc. may contain viruses and should not be forwarded to other members of staff or to outsiders. Likewise, attachments of whatever nature from external sources/e-mail address should only be opened on approval from IT Department.

DRESS

Every employee shall be appropriately dressed at all times when he/she is on duty or when entering or leaving Bank premises. It is important to maintain an appearance which is not offensive to customers or other staff. It shall be considered appropriate for Men to wear business suits, blazer/trousers, shirt and tie. Jackets may be removed if worn with belted trousers, tucked-in shirt and tie. It shall be considered appropriate for Women to be attired in dresses, skirts, trousers and blouses/jumpers preferably worn with or within jackets.