



POLICY ON INTERNAL CODE OF BUSINESS CONDUCT AND ETHICS FOR ALL DIRECTORS AND EMPLOYEES

Version 2

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01. Preamble

This Code of Conduct and Ethics adopted by “Sarvodaya Development Finance PLC” (SDF) to ensure that the highest level of professionalism, ethical conduct and good governance are expected of all directors and employees in order that the right decisions are taken in performing roles and responsibilities across various functions.

The Code is intended to be a Code of Conduct for day-to-day work to enable all directors and employees to make the right decisions and, serves to

- 1) Underline the fundamental commitment to compliance with regulatory guidelines and to the laws of Sri Lanka.
- 2) Set forth basic parameters of ethical behavior.
- 3) Establish a system for detection and reporting of known or suspected violation of procedures / regulations and applicable Laws of Sri Lankan jurisdiction.

02. Application of the Code

All directors and staff are responsible for reading this Policy and other relevant policies to stay informed about procedures, regulations, and requirements related to your business or role. SDF expects all directors and employees to conduct their affairs with ethics and integrity, avoiding any actual or perceived conflicts of interest, especially financial interests with customers, suppliers, or other parties associated with SDF. While it's impossible for a code of conduct to address every situation, if you're unsure, seek clarification before taking action. The process for seeking clarifications on policies or specific issues not covered in the policies is outlined below.

I. Seek Guidance

The Code and other related policies cannot anticipate every issue in granular detail. Answers to questions involving ethical considerations are often neither easy nor clear-cut. All directors and staff should understand and abide by both the spirit and the letter of the policies and standards of the Code. Some key aspects that should be kept in mind are:

- Ensure that all the facts are made available.
- Where there is shared responsibility, discuss the issue with the other colleagues involved.
- A basic responsibility is to discuss the problem with your supervisor.
- However, in case you are uncomfortable discussing the matter with your supervisor; discuss it with your Department Head, Unit Head/Branch Head or the Head of HR.
- In case of an issue that appears ambiguous, ask yourself if your action is consistent with the Code or other policies.

II. Raising Concerns and Reporting Violations

Inappropriate, wrongful or unethical behaviour by any employee, supervisor, customer, supplier or other third party can significantly compromise the reputation of SDF. Such issues must, therefore, be reported immediately. It is your responsibility, therefore, to report concerns or questions relating to unethical behaviour, malpractices or apparent violations of law and regulation that you perceive in your workplace. If such behaviour appears to be in conflict with this Code, you must promptly inform the following officials or entities.

- a. Supervisor, Unit Head or the Department Head as appropriate
- b. Head of Human Resources
- c. Designated contacts under a specific policy or procedure
- d. Compliance Officer of SDF

No action will be taken against anyone for reporting ethical violations in good faith, or participating or assisting in the investigation of a suspected violation of the Code of Conduct. Any act of retaliation against a person who reports such transgressions, malpractices etc. would tantamount to a violation of the Code of Conduct and Ethics of SDF.

03. Addressing of Conflict of Interest

Addressing of conflict of Interest

All employees must maintain high levels of integrity to prevent any conflicts of interest between their personal interests and the interests of SDF and stakeholders. Conflicts of interest can arise in various situations, such as dealings between all directors and employees and vendors, customers, counterparties, acquaintances, or relatives. When there is a possibility that your relationship with any of these entities could influence a transaction, it is considered a conflict of interest. Such relationships may compromise fair and unbiased assessments of the transaction and may not be in the best interests of SDF. They could even result in personal financial or non-financial gains for the employee or their family members. All directors and employees should be extremely cautious when encountering the following conflicts of interest.

I. Self-Dealing

Any time SDF provides a service or extends credit to an employee, there is a potential for a conflict of interest. The same potential conflict exists when the transaction involves an employee's family. These transactions must be scrutinized and documented carefully. Loans to Senior Officers, Directors, principal shareholders or members of their immediate families must be subject to the same requirements as for our customers and will be made only pursuant to statutory and regulatory requirements and SDF's policies and procedures.

II. Outside Activities

Employees are expected to avoid any outside interest or activity that will conflict with the employee's duties. Generally, outside interests or activities should not:

- a) Significantly encroach on time or attention you devote to your duties;
- b) Adversely affect the quality of your work;
- c) compete with SDF's activities;
- d) involve any significant use of SDF's equipment, facilities or supplies; and

III. Outside Employment

All directors and employees are prohibited from taking on / engaging in outside employment where they act as representatives involved in preparing, auditing, or certifying statements or documents related to SDF's business.

IV. Corporate Opportunities

Every employee must be loyal to SDF. Violating this loyalty occurs when an employee benefits personally from a business opportunity that rightfully belongs to SDF. This situation can arise when an employee has an interest in a company that provides a product or service similar to what SDF offers, or when the employee themselves directly offers such a product or service.

Some examples of situations where conflict of interest may arise are (the list is not exhaustive)

- a) Taking a business decision (including lending decisions, guarantees) that may result in personal gain, or benefit to a relative or acquaintance.
- b) Using your authority or knowledge of confidential information for personal benefit.
- c) Serving in a fiduciary capacity or as a director, official, any elected post of a company or political party outside of SDF for non-profit, trade/industry, government agency without approval.
- d) Competing with SDF for a business opportunity or diverting of opportunities.
- e) Accepting money, favours, gifts, meals, entertainment or other benefits (seen to be beyond normal business courtesies) that may influence business or commercial decisions of SDF.
- f) Promoting a particular vendor or entity for personal gain.
- g) Using SDF's facilities, employees, funds, property or resources towards personal activities.
- h) Having a relative functionally reporting into you or where you are in a position to influence his/her pay, promotion, transfers etc.

If you believe you have a conflict of interest, or may be perceived to have such a conflict, you must disclose this to your Department head or Human Resources Department.

V. Promoting Ethical Practices

It is critical to SDF's reputation that the actions of the organization and of its all directors and employees are seen to be appropriate and ethical. Staff should, therefore, critically review SDF's business activities, sales practices, product features, potential conflicts of interest and aspects that may be frowned upon from a governance standpoint and which could affect the reputation of SDF. Each Business Head / line of business is responsible for knowledge of the laws and regulations that apply to its businesses, communicating necessary information to all directors and employees and maintaining an appropriate compliance program. The following sections outline some key requirements.

VI. Anti-corruption and Bribery

SDF has zero tolerance towards all forms of corruption and bribery.

All directors and staff should be especially sensitive to this aspect in their dealings with the various entities that they come in contact with. In particular, SDF prohibits offering, promising, giving or authorizing directors and staff to give of anything of any value, either directly or indirectly, to any person or entity. Under no circumstances may directors and staff offer, promise or grant anything of value to anyone for the purpose of influencing the recipient. Payments made indirectly through any intermediary or other third party are subject to the same restrictions.

VII. Compliance with Regulation relating to KYC and Money Laundering

Compliance with regulation relating to KYC and Money Laundering has a critical bearing upon the quality and integrity of SDF's operations and strict adherence to regulatory guidelines is a pre-requisite that cannot be compromised. Towards that end, it is

essential that all directors and staff exercise utmost diligence in establishing the antecedents of SDF's customers at the stage of on-boarding and that appropriate oversight is maintained upon the operations in customers' accounts for detecting suspicious transactions.

VIII. Inappropriate Selling and Customer Commitment

Inducing customers to purchase unnecessary products or engaging in "mis-selling" to meet budget targets is unacceptable. It harms customers and damages SDF's credibility and reputation, contradicting our goal of being customer-centric. All directors and staff role is to help customers make informed decisions based on their requirements, suggesting products that best meet their needs and align with their profile. As SDF acts as an advisor for third-party product sales, it's crucial to satisfy customers' needs by recommending the appropriate product mix based on their risk profile and financial requirements.

Building trust, satisfaction, and loyalty among customers is essential for creating sustainable business for SDF. Understanding customer needs should be ingrained in our business approach and service provision.

IX. Gaming

Gaming is defined as the manipulation, misrepresentation, or both of sales or sales reporting in an attempt to receive compensation or to meet sales goals. Any form of gaming, indulged in, for receiving compensation or to meet sales goals etc. is prohibited. Gaming issues may arise in but are not limited to the following categories of activities.

X. Undue Influence

All directors and staff should not try to influence anyone, including colleagues, vendors, or subordinates, for personal gain or benefit, whether it's for yourself, your friends, relatives, or even for a particular team member. Using personal, social, or professional relationships to manipulate others into performing actions that go against standard business practices is considered inappropriate and should be avoided.

04. Handling of Business Opportunities

All directors and staff should not take advantage of opportunities that rightly belong to SDF. For instance, you should not:

- a) Divert business from SDF for personal benefit.
- b) Receive a commission or fee for a transaction you have conducted for SDF (other than compensation or incentives, if any, paid by SDF).
- c) Refer a customer whose credit application was denied by SDF to another financial institution/entity for funding.

05. Lending Transactions

No employee shall grant on behalf of SDF any loan or advance to (a) a family member; (b) an individual whose guarantor is a family member or an individual who is a partner in business of a family member; (c) a firm in which a family member is a partner, manager or guarantor; and (d) a company in which a family member holds substantial interest or is interested as director manager or guarantor, without prior permission of the MCC.

I. Gifts and Entertainment

A business gift refers to anything of value, including, but not limited to, meals, accommodation, loans, cash, favourable terms or

discounts on any product or service, services, equipment, products, transportation, use of vehicles, vacation or other facilities, securities, home improvements, tickets (travel, leisure, social, sporting events, etc.), gift certificates, gift cards, discount cards, memberships or consulting relationships, favorable employment, etc.

You are not permitted to accept or provide business gift. If the return of the gift may not be feasible due to situations, it may be reported to the Compliance Officer who may decide appropriately including but not limited to the option of donating it to a designated charity.

Prior to making any gift offers to government employees/departments, you must ascertain if there are any limitations or requirements that apply, e.g., limits on gifts and entertainment, requirement to register etc. and be guided by specific directives (or internal policies).

An employee who procures a service from a vendor (or is involved in the procurement process) should inform the vendor of the SDF's Gift Policy in order to avoid any embarrassment in this regard.

You are discouraged to accept or solicit gifts, make a donation as a gift or other benefits from any colleague (except for special occasions such as marriage, transfer or retirement) so as to avoid possibility of such gifts or benefits appearing to compromise official relationships.

06. Privacy & Confidentiality Obligations

I. Privacy of Employee Information

It is essential to strictly safeguard personal and confidential information of all directors and employees. SDF has measures in place to respect employee privacy and ensure the confidentiality of their personal information. Sharing or discussing employee-related information with external parties or unauthorized employees is prohibited, except when internally authorized or required by law, regulations, jurisdiction, or governing bodies. Compliance with security and privacy policies and guidelines, regarding personal and confidential information is mandatory, and failure to do so may result in disciplinary action. Requests for such information should only be responded to in accordance with internal policies, authorization, and applicable laws and regulations.

These privacy and security guidelines apply to both our all directors and employees and individuals whose information is provided to SDF within the scope of the working relationship.

II. Protecting Proprietary and Confidential Information

Proprietary and confidential information relating to SDF business and operations (listed illustratively below) is the property of SDF. It may include sensitive information and data that is not in the public domain and should not be shared which includes:

- a. The SDF's business plans
- b. The SDF's financial performance, if it has not been disclosed
- c. The SDF's trading activities, holdings of investments
- d. Customer data
- e. Our suppliers and distributor relationships
- f. Employee data

- g. Information relating to SDF's products, services, and pricing
- h. Intellectual property which SDF has not disclosed to the public
- i. Information relating to technology, systems and processes
- j. Information related to Data Centers
- k. Passwords, computer programs and software being used by SDF
- l. Marketing plans, strategies, and costs
- l. Potential acquisitions and divestments

All directors and staff must protect and refrain from disclosing or misusing personal and confidential information about SDF, its customers, suppliers, distributors, or employees to unauthorized individuals or external entities, unless permitted or required by applicable laws and regulations. Improper release or unauthorized access to confidential information undermines customer trust, leading to potential loss of business and legal consequences.

In addition to the above guidelines, all directors and staff should:

- Maintain complete and accurate records, adhering to retention policies and disposing of unnecessary information.
- Comply with legal, accounting, tax, IT security, and regulatory reporting requirements, ensuring timely submissions.
- Take reasonable measures to safeguard SDF's information, preventing loss, damage, misuse, or unauthorized use, following internal policies.
- Protect company information, including logos, patents, trademarks, and copyrights, from illegal copying or misuse according to branding standards.
- Establish business continuity measures to safeguard all directors and staff, critical operations, and functions during business disruptions.
- Control access to work areas, infrastructure, and computers appropriately.
- Avoid discussing proprietary or confidential information in public places or through electronic media.
- Promptly report any concerns related to questionable or inaccurate records or instances of misuse or inadequate safeguarding of SDF's information.

Upon termination of all directors and staff employment or affiliation with the SDF, all directors and staff are required to return any and all means of accessing SDF information such as any SDF property, including but not limited to all ID cards, keys, telephone cards, laptops, cellular phones, fax machines and any other means of accessing such information. Engaging in unauthorized use, misappropriation, or disclosure of such information by forwarding it to personal devices, email addresses, third-party service providers, servers, websites, or engaging in any other actions before resignation or termination can result in disciplinary consequences. It is also prohibited to bring any trademark or confidential information from a previous Employer of a director or staff member to SDF or use such information to benefit the business without the prior consent of the former employer, unless permitted by law or regulation.

07. Commitment to External Stakeholders

I. Maintaining Business Relationships and Fair Competition

SDF's commitment to dealing with external stakeholders such as customers, competitors, suppliers, and any related agency is based on the principles of fair competition, compliance with laws and regulations of the land, and in the spirit of honesty and integrity of our corporate values. While maintaining a competitive outlook in the market, all directors and staff will practice the following

Conducting business in accordance with applicable laws and regulations governing SDF.

- Respecting the confidentiality, privacy and intellectual property of external stakeholders.
- Transfer of accurate and complete information from and to our customers while complying with internal proprietary policies, data protection laws and any contractual obligations.
- Avoiding conflict of interest in business dealings for the customer whose assets we manage.

This includes having controls to minimize and resolve potential conflicts. Fair hearing to any concerns from SDF customers while acting promptly on the resolution. If the complaint involves data privacy or an accounting or auditing matter, special measures will be followed. In terms of supplier relationship, SDF's protocols on pricing quotation, quality of services or goods or any other related matter will be followed in compliance with internal and external rules or be subject to other internal restrictions or disclosure obligations under securities or other laws.

To maintain the spirit of fair dealings with any external body, SDF will refrain from the following:

- Engaging with any third party known to be involved in manipulative or concealing market practices (fixing prices, allocating sales markets, exclusive dealing with vendors) or with activities that threaten public order or safety.
- Payment, acceptance, offer, or authorization of money, gifts, or any other forms of bribe and corruption with the customers.
- Offering of anything of value to external stakeholders that could be construed as requiring or influencing any official decision and would give an impression of either obtaining or retaining business, suggesting that any business or service may be withdrawn or awarded in return for other business or securing an improper advantage in the market.

II. Maintaining Transparency with Regulators

SDF values its relationship with regulators and maintains open communication. Cooperation and understanding of their mission and processes, aligned with internal policies, are crucial. Adhering to laws and regulations safeguards our reputation. As an employee, all directors and staff play a vital role by ensuring compliance with regulatory principles and guidelines. Discourage improper lobbying and promptly report any concerns about conduct or relationships with regulators to compliance officials. Together, all directors and staff uphold their commitment to regulatory compliance and the best interests of SDF.

III. Co-ordination with Government and Regulators

SDF expect all directors and employees to maintain a responsive, fair, and transparent approach when dealing with regulatory, legislative, or administrative bodies. It is important to provide accurate and timely responses to information requests, following

internal policies and external regulations. If there are any delays, proper communication with authorities should be maintained. Cooperation and reporting of any violations, whether related to regulations, laws, internal processes, contracts, or guidelines, are required. It is strictly prohibited to disclose any details of investigations to anyone, both inside and outside the organization, and confidentiality must be upheld. Making false statements or misleading auditors, investigators, legal counsel, colleagues, regulators, or government entities can lead to severe penalties.

IV. Charitable Contributions, Civic Activities & Sponsorships

Any personal activities related to charitable and/or educational activities should not interfere or in any way conflict with all directors and staff work or with SDF in any manner.

V. Participating in Trade associations, Conferences and speaking engagements

Meetings at professional gatherings, trade associations or conferences activities should not interfere or in any way conflict with your job duties or with SDF in any manner and may not be undertaken without the approval of the authorized personnel. There may be instances of contact with competitors for which all directors and staff must follow the rules related to fair competition referenced in this Code and company policies.

VI. Political Activities & Contributions

All directors and employees may not contribute or solicit political contributions, the SDF's funds or assets, resources to any political candidate, party, or similar organization; unless such contribution is expressly permitted by law/ regulation / directive and has been pre-approved by the Board of Directors of SDF. Under no circumstances will SDF directly or indirectly reimburse any employee for their individual contributions. Volunteering of personal services during SDF's working hours on behalf of a political candidate, lobbying or engaging in any outreach to public officials, including attempts to influence legislation, government agencies, etc. is prohibited.

08. Workplace Conduct

I. Fair behavior and Employment Practices

All SDF Code of Conduct promotes professionalism, integrity, mutual respect, and fairness among all directors and employees. SDF should strive to be a meritocratic organization that values excellence, initiative, and diversity. SDF and its all directors and staff are accountable for its actions, treating teammates with respect and sharing responsibility for successes and failures. Creating hostile environments, harassments, threatening, spreading false rumors, or displaying abusive behavior is strictly prohibited. We prioritize a disciplined, ethical, and productive work environment, resolving conflicts amicably. Respectful workplace concerns will be addressed promptly, without favoritism or emotional decision-making. All directors and employees must disclose any family members working at SDF and refrain from using their position to secure employment for them in external companies.

All directors, officers and employees shall behave honestly and ethically at all times and with all people. They shall act in good faith, with due care, and shall engage only in fair and open competition, by treating ethically competitors, suppliers, customers and colleagues. They shall not misrepresent facts or engage in illegal, unethical, or anti-competitive practices for personal or professional gain. No director, officer or employee may offer or accept bribes, kickbacks or substantial gifts either directly or through another party.

SDF management seeks to maintain an inclusive diversity of our all directors and staff across branches and departments and recruit, develop and retain highly qualified, diverse and dedicated individuals for our workforce. The equal employment opportunity principles are based on fair employment regulations and non - discriminatory practices at workplace.

II. Harassment and Discrimination

Harassment is an undesirable verbal or physical behavior that interferes with work or creates an intimidating, hostile or offensive work environment. Examples include:

- a) Public or private tirades or bullying by a supervisor, subordinate, or peer.
- b) Severe or repeated insults related to personal or professional competence.
- c) Threatening or insulting oral or written comments.
- d) Deliberate desecration of religious, racial, ethnic, or national symbols.
- e) Malicious and knowingly false complaints against others.

SDF prohibits any discrimination (race, gender, caste, religion, disability, marital status, pregnancy, culture, ancestry, socioeconomic status etc.) while in employment or advancement. SDF further promotes a work environment where employees are valued and not discriminated on the basis of any reason. SDF prohibits discrimination or harassment of any nature that violates our policies, whether committed by or against a manager, co-worker, client, supplier or visitor.

The SDF prohibits uses of its communications, equipment, systems and services, including e-mail services and/or intranet/Internet services, to create a hostile, discriminatory, or offensive work environment. This includes, downloading, transmitting, viewing or exchanging "jokes," pictures, stories, videos or other communications or content which are threatening, harassing, demeaning or offensive to any individual.

III. Sexual Harassment

Sexual harassment is an unwelcome and offending sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. The concept of consent determines what is considered not welcome by a colleague or subordinate. If he or she says "No." or "stop" or "Don't do or say that" if the offender continues that action or word, it will be deemed as harassment.

Examples of sexually harassing behaviour include:

- a) Unwelcome touching;
- b) Inappropriate staring or leering;
- c) Suggestive comments or jokes;
- d) Sexually explicit pictures or posters;
- e) Unwanted invitations to go out on dates;
- f) Requests for sex;
- g) Intrusive questions about a person's private life or body;
- h) Unnecessary familiarity, such as deliberately brushing up against a person;
- i) Insults or taunts based on sex;
- j) Sexually explicit physical contact; and

- k) Sexually explicit emails or SMS text messages.

IV. Workplace Health & Safety

SDF strives to provide a safe work environment and comply with guidelines and applicable local laws or regulations that govern workplace health and safety. To ensure healthy, safe and secure working environments, we must practice the following:

- a) Take all reasonable measures to avoid putting others' lives and health at risk by preventing workplace accidents and injuries.
- b) Give customers and colleagues adequate health and safety information.
- c) All directors and staff should be alert to individuals who are on premises of SDF without proper authorization and report any unusual activities being conducted within the workplace to the Unit Head or reporting authority.
- d) Ensure that visitors on company premises follow the appropriate procedures to prevent unauthorized access to materials, information or persons.
- e) Should not possess, distribute, sell, transfer or use alcohol, drugs, firearms or other items that could adversely affect health, safety and security in the workplace or in the working hours.
- f) Take adequate measures to protect the integrity of computer and information systems, including password protection.

v) Communication with Media

Any official communication, verbal or electronic (which includes speeches, interviews etc.) with media and publishing houses, blog posts, websites, agencies, books, articles, podcasts, web casts, videos, can be undertaken only after authorization of the Chief Executive Officer. All directors and staff are not permitted to represent or to be perceived representing SDF, neither are they permitted to make any statements on behalf of the organization unless authorized to do so. All directors and staff should also be diligent while using social media like Twitter, Facebook, Youtube, LinkedIn, etc. All directors and staff should not post a comment, provide any recommendation, or endorse customers or vendors (either current or former) in the social media unless all directors and staff are authorized to do so.

VII. Maintaining accurate Company Records and Reporting Requirements

Data and information relating to SDF that is publicly disclosed or is provided to regulators should be complete and accurate. The SDF is committed to integrity of financial reporting and complete disclosures as mandated under applicable law and regulation. Falsification of any information or data (i.e. mis-statement, alteration, modification, omission or deleting of information) related to SDF is a serious misdemeanor and is prohibited.

VIII. Protecting SDF's Property and Assets

Any property and assets of SDF, whether tangible or intangible in nature, may be used only for approved purposes. The assets of SDF should be used responsibly for professional and legitimate business purposes and not for personal gain. Assets are inclusive (but not limited to) of cash, funds, securities, physical property, professional services, internal plans or business strategies, client and employee information, supplier details, distributor information, equipment like computers, telephones, fax machines, intellectual property (software, office mails, shared disk drives, computer programs, models, copyrights and other items), company logo & brand, office supplies and all other personal, proprietary and confidential information. The SDF reserves the right to intercept, monitor and record your communication on SDF's systems including mails, computers etc., in accordance with the law

of the land

You should protect SDF's assets and ensure their efficient use. All assets of SDF should be used for legitimate business purposes only and any suspected fraud or theft of the SDF's property must be reported for investigation immediately. To protect the SDF's physical assets, you must:

- a) Avoid using the SDF's property, assets or equipment in an improper manner, i.e. for purposes other than the conduct of the SDF's business;
- b) Report any suspected fraud or theft of the SDF's property.

IX. Managing Personal Finances

As a financial institution, SDF's business depends on public confidence in its ability to assist manage the financial affairs of others. In general, all directors and staff personal finances are private. However, because all directors and staff represent SDF, it is important that all directors and staff manage their personal finances in an appropriate and prudent manner, avoiding instances of excessive indebtedness or bankruptcy. Any improper handling of all directors and staff personal finances could undermine all directors and staff credibility and that of SDF's. It could also cause others to question all directors and staff decision-making quality on the job.

All directors and staff must refrain from any personal financial transaction with fellow employees, customers or suppliers, whether borrowing or lending. All directors and staff must not lend personal funds to, co-sign, endorse, guarantee, or otherwise assume responsibility for the borrowings of any customer or vendor of SDF unless the customer or vendor is a family member, other relative, or close personal friend and the personal or family relations, and not the company's business, is the basis for the transaction.

09. Head of the Departments and Managers Responsibility

As a progressive organization, Head of the Departments and Managers have a special responsibility to demonstrate values through their actions. As Head of the Departments and Managers, all directors and staff must foster an environment of integrity, honesty and respect. This includes creating a work environment that is free from discrimination, harassment, intimidation or bullying of any kind. All directors and staff must also ensure that all aspects of the employment relationship are free from bias and that decisions are based upon individual performance and merit. As a Head of Department or a Manager, all directors and staff are therefore additionally accountable for the following:

- a) To be thoroughly familiar with the requirements of and the procedures established by the Code and to exemplify the highest standards of ethical behavior.
- b) To ensure that team members understand that business results are never more important than ethical conduct and compliance with applicable law and the SDF's policies.
- c) To ingrain the principles of the Code and compliance with applicable laws, regulations, and policies into your business unit's practices.
- d) To create a culture in which team members feel comfortable asking questions and raising ethical concerns without fear of retaliation.

10. Employee Declaration

I, Mr./ Ms. _____ acknowledge that I have read SDF's Code of Conduct and Ethics and understand my obligations as an employee to comply with the principles and policies outlined therein, including any amendments made by SDF from time to time. I understand that a current copy of the Code of Conduct and Ethics is available at HR Division

I am aware that SDF has a "zero tolerance" policy for violation of the Code of Conduct and Ethics and if any of my actions do not meet the provisions of the Code, appropriate action commensurate with the nature and pervasiveness of the violation will be taken against me.

It is my responsibility to be updated on amendments to/introduction of new policies related to Code and in the event of any conflict, bring the same to the attention of SDF.

I also understand my obligations under the SDF's Code of Conduct and Ethics to declare any conflicts of interest, as and when it arises during my employment with SDF, to the Human Resources Division or the Compliance Officer.

Signature: Date:

Name: Emp. No.