CODE OF ETHICS & CONDUCT

POLICY

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1.0 Introduction

This Code of Conduct and Ethics (the 'Code') describes some of the responsibilities of the employees of SBI (Botswana) Ltd (the 'Bank').

This Code is promulgated by the Board of Directors of the Bank to promote honest and ethical conduct and compliance with applicable government rules and regulations. It is also designed to assist in defining appropriate personal and professional conduct, to provide guidance in the identification and resolution of ethical issues, and to help all personnel maintain the Bank's longstanding culture of honesty, integrity and accountability. In general, the use of good judgment, coupled with high ethical standards, is the best guide. Questions regarding this Code or the appropriateness of any action or arrangement should be addressed to the Human Resources Department of the Bank.

This Code applies to the past, present and future employees. For the purpose of this code, the term employee refers to all members of staff including employees, officers, management and executives.

Violation of the provisions of the Code can be grounds for appropriate disciplinary action, including dismissal.

1.1 Our Mission

To create products and services that help customers achieve their goals and facilitate excellence in service.

1.2 Our Vision

Customer first and first in customer satisfaction.
2.0 Individual Activities

2.1 Personal Conduct

Each employee should always be mindful of the Bank's prominence and reputation in the community. Since the success of any banking business depends on the public's trust, it is extremely important that an employee conducts his/her personal affairs in such a way as to avoid discredit or embarrassment to him/her and the Bank. The employee's personal behavior and appearance should be governed by both common sense and good taste.

An employee may not use, possess or sell alcohol or any illegal or illicit substances prohibited by the law on the Bank's premises, nor work under the influence of any such substances. This prohibition does not apply to any over-the-counter drugs or prescription drugs taken in accordance with a doctor's instruction.

2.2 Personal Financial Responsibility

Each employee must manage his or her personal finances in a prudent, businesslike manner. All officers, employees, managers and executives are to handle their deposit and loan accounts with all financial institutions responsibly and repay the loans promptly.

The following activities are prohibited:
- Borrowing money from other staff members.
- Borrowing money from customers other than those that are lending institutions.
- Issue cheques without ensuring that sufficient funds are in the account.
- Help or condone transactions which are against Bank's policies.

Acting as co-signer or guarantor for others may result in the co-signer or guarantor having to pay the obligation. Accordingly, an employee should not assume co-signer or guarantor responsibilities unless the employee is in a position to pay the entire obligation upon demand and that too only with the approval of the Bank.

2.3 Personal Investments

Employees of the Bank, by the nature of their positions, must be particularly circumspect regarding investments that may appear improper to customers, regulatory authorities, or the public. An employee should therefore consult the Human Resources Department before making investments that might have even an appearance of impropriety.
An employee should avoid entering into transactions in which it may appear that he/she is improperly benefiting from his/her relationship with the Bank. This applies also to investments by members of an employee’s immediate family.

While a complete list of such matters cannot be given, an employee must refrain from directly or indirectly owning or purchasing any of the following, unless specifically approved in writing by the Managing Director of the Bank:

✓ Real estate or property in which the Bank has or intends to obtain an ownership interest (e.g. through purchase, foreclosure or repossession, or in a fiduciary capacity).
✓ Stocks, bonds, or other securities about which the employee has or could be expected to have confidential information (e.g. a proposed merger involving a customer).
✓ Trust deeds, mortgages that create a security interest in property in which the Bank has a security interest.

2.4 Fair Dealing

Each employee should endeavor to deal fairly with the Bank's customers, suppliers, and competitors. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practices.

The Bank seeks competitive advantages through superior performance, but never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information without the owner's consent, or including such disclosures by past or present employees to other companies is prohibited.

2.5 Complying with Laws

All employees must respect and comply with all laws, rules, internal policies, guidelines issued by the Bank and regulations of Botswana and other countries, cities, and other jurisdictions, in which the Bank conducts its business or which are otherwise applicable to the Bank. Such legal compliance must include, without limitation, compliance with the 'insider trading' prohibitions applicable to the Bank and its employees. Generally, employees who have access to or knowledge of confidential or non-public information from or about the Bank are not permitted to buy, sell or otherwise trade in the Bank's securities, whether or not they are using or relying upon that information. This restriction extends to sharing with or tipping others about such information, especially since the individuals receiving such information might use such information to trade in the Bank's securities. These are further elaborated under the heading 'Insider Trading in Securities and Confidentiality of information'.

This Code does not summarise all laws, rules, internal policies, guidelines and regulations applicable to the Bank and its employees. Please consult the
Bank's Human Resources Department and the various guidelines that the Bank has issued concerning specific laws, rules and regulations.

2.6 Anti-Competitive Activities

If an employee is in contact with the Bank's competitors, he/she must avoid any agreement with them (or even circumstances that might give the appearance of such an agreement) relating to how the Bank conducts or will conduct its business. The employee should under no circumstance divulge any confidential information regarding the Bank's dealings to any Competitors or related parties. The employee should be especially careful at social or professional gatherings and at trade association meetings so that he/she does not enter into discussions or exchange information relating to competitive matters (e.g. cost, pricing or strategy) must be carefully avoided.

3.0 Conflicts and Self-Dealing

3.1 Corporate Opportunity

Employees are strictly prohibited from (a) taking for themselves personally any opportunity that properly belongs to the Bank or is discovered through the use of corporate property, information, or a proposition; (b) using corporate property, information or position for personal gain; and (c) competing with the Bank. Employees, officers and directors owe a duty to the Bank to advance its legitimate interests when the opportunity to do so arises.

3.2 Conflicts of Interest

Conflicts of interest between the employees of the Bank and its customers (or their affiliated persons or entities) must be avoided at all times. In other words, an employee may not use his/her position, influence or confidential information related to the Bank or his/her employment for the employee's personal gain. Conflicts of interest include, but are not limited to, compensating from directorships, with or investments on or with customers of the Bank or employment with the Bank. The following activities are prohibited:

✓ Personal investments in a customer's or a supplier's business.
✓ Receiving discounts on personal purchases from suppliers or customers because of their business relationship with the Bank.

✓ Any conflict of interest must be reported to the relevant Vice-President or any members of the senior management.

3.3 Outside Employment

Employees are expected to devote full-time attention and energy to the bank. Outside employment, in any form whatsoever, is not allowed due to the fact that it might subject the bank to criticism or might encroach upon working time,
interfere with regular duties, or necessitate such long hours as to affect your working effectiveness.

3.4 Self-Dealing

An employee must not represent the Bank in any transaction in which he/she may derive a benefit. To avoid possible conflicts of interest, loan applications submitted to an employee by close relatives or close personal friends (or entities controlled by relatives or close personal friends) are to be submitted to other independent lending officers of equal or higher position for processing and approval. This policy also applies to the processing and approval of overdrafts.

An employee must not approve his/her own loans, act as officer on any account on which the employee is a signatory, possesses, signs his/her documents, signs his own transaction, or authorizes refunds on any account on which the employee is a signatory. This prohibition applies also to loans and accounts of relatives, close personal friends and entities owned or controlled by any of them.

An employee must not accept business opportunities from persons doing business or seeking to do business with the bank. An employee must never use his/her position with the bank to influence public officials or others for his/her personal benefit. Likewise, the employment with the Bank must not be used as leverage to gain favours from customers or suppliers.

3.5 Gifts and Business Entertainment

No employee of the Bank shall solicit, accept, or agree to accept anything of value for the benefit of any person from anyone doing or seeking to do business with the Bank, including borrowing money. Purchasing property, or furnishing property or services to the Bank, except as expressly permitted by this section.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. No such gift, entertainment, or repayment should be offered, given, provided or accepted by any Bank employee, family member of an employee, or director unless (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws or regulations.

An employee should discuss with his/her reporting line any entertainment, gift or proposed gift that may not be appropriate.

Possible exception to the general prohibition regarding the acceptance of things of value may include:
✓ Acceptance of gifts, gratuities, amenities, or favours based upon family or personal relationships (e.g. from parent, child or spouse of an employee of
the Bank) when the circumstances make it clear that those relationships, rather than the business of the Bank, are motivating factors.

✓ Acceptance of meals, refreshments or entertainment, all of reasonable value, in regular course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relationship; provided that any such expenses would have been a legitimate business expense paid by the Bank if not paid by another party.

✓ Acceptance of advertising or promotional material of nominal value, such as pens, pencils, note pads, key chains, calendar, and similar items.

✓ Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers.

✓ Acceptance of gifts of reasonable value related to commonly recognised events or occasions, such as promotion, new job, wedding, birth, retirement, Christmas.

✓ Acceptance of civic, charitable, educational or religious organisational awards for recognition of service and accomplishment.

4.0 Confidentiality

4.1 Confidential Information

Information obtained in the course of evaluating a loan application or servicing a loan, and other information about customers' business plans, forecasts, account balances, decisions and problems, suppliers, prospective customers, employees or applicants is strictly confidential and the property of the Bank. Use of material inside information that an employee knows of, but has not been disclosed to the investigating public, must not be made use for personal benefits and an employee must abstain from trading in or recommending the securities concerned. If it is necessary to transport documents containing sensitive information, care should be taken to protect their security. An employee should not discuss any matter of a confidential nature in a public place where the conversation might be overheard.

Customer information should not be given unless ordered by way of judicial authority or by the regulator acting in pursuance of the law or a court order.

4.2 Confidential Information about the Bank

Financial information about the Bank is not to be disclosed to anyone unless it has been included in a published report or otherwise made generally available to the public. Any questions concerning the disclosure of confidential information should be addressed to the Managing Director.

4.3 Insider Trading in Securities

If an employee is aware of material information relating to the Bank that has not been available to the public for at least two full days (often called 'inside
information'), he/she is prohibited from trading in the stock of the Bank, directly or indirectly, and from disclosing such information to any other person. Any information, whether positive or negative, is 'material' if it might be of significance to an investor in determining whether to purchase, sell or hold stock of the Bank. Information may be significant for this purpose even if it would not alone determine the investor's decision. Examples include a potential business acquisition, internal information about revenues, earnings, or other aspects of financial performances which departs in any way from what the market would expect based upon prior disclosures, important business developments, the acquisition or loss of a major customer, or an important transaction. This list is only illustrative.

The prohibition against trading on insider information generally reflects the requirements of law as well as this Code. As more fully discussed below, a breach of this prohibition may constitute a serious violation of law as well.

4.3.1 Tipping

Improper disclosure of non-public information to another person who trades in the stock (so-called 'tipping') is also a serious legal offence by the tipper and a violation of the terms of this code.

4.3.2 Consequence of Violation

The Bank considers strict compliance with this Code to be a matter of utmost importance. Violation of this section of this Code could cause extreme embarrassment and possible legal liability to an employee and the Bank. Willful violations of this section will be a cause for disciplinary action including immediate suspension of employment leading to termination of employment. Violation of this section might expose the violator to severe criminal penalties as well as civil liability to any person prejudiced by the violation. The monetary damages flowing from a violation may well be much more than realised by the violator plus the attorney's and barrister's fees of the persons injured.

4.3.3 Resolving doubts

If an employee has any doubt as to his/her responsibilities under this section, he/she should seek clarification and guidance from the relevant Vice President concerned or from the Managing Director. In case of doubt an employee should not take the risk of trying to resolve uncertainties on his/her own.

4.4 Confidential Information about Past and Present Employees

The policy of the Bank is to safeguard the confidential aspects of its relationship with its employees, to satisfy all requirements of the applicable Employment legislation, and to maintain uniformity in replies to inquiries concerning past and present employees. In order to assure that this policy is consistently maintained, any inquiries relating to employment, salary verification, and
performance evaluation regarding past and present employees must be referred to the Human Resources Department.

5.0 Employee Activities

5.1 Solicitation and Distribution Activities

In order to minimise work interruptions and to maintain a businesslike environment, the Bank restricts solicitation and distribution activities on its premises. The display of advertisement or promotion, the sale of any goods or services, or the solicitation of any contribution on the Bank's property should be coordinated through the Human Resources Department.

5.2 Protection and Proper Use of Bank's Assets

All employees, officers and executives should protect the bank's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Bank's profitability. All Bank assets should be used for legitimate purposes.

5.3 Political Activities

(i) No employee shall take part in political activities during office hours.
(ii) There should be no time off during the hours of work for any employee to carry out political activities.
(iii) Employees shall act diligently, impartially and independently from any of their political activities or any of their political party preference or to which employees belong to while carrying their work at the Bank.
(iv) No employees shall identify or associate themselves with the bank when engaging in any political activities in any way whatsoever.

5.4 Dealing with the Government and Government Officials

Under no circumstances may an employee make any payment to any government official or other person or organisation that might in any way be construed to be improper, illegal or a bribe. If any transaction with the government official or other person or organisation seems even remotely questionable, it must be referred to the Managing Director for a determination as to its propriety.

5.5 Speeches and Articles for Publication

An employee may not speak on behalf of the Bank or discuss the Bank's policies and procedures in articles, speeches, or presentations without the prior written consent of the Managing Director.
5.6 Post Employment Activities
Information may not be discussed with former employees, who may contact an employee concerning any Bank customer information, which he/she participated with while employed with the Bank.

6.0 Compliance with Code, Reporting, Monitoring
The Bank's executives must further abide by this Code to assure that the Bank maintains the highest integrity with respect to the preparation and reporting of financial information related to the Bank and to assure full, fair, accurate, timely and understandable disclosure in public communications.

6.1 Public Disclosures
As a public company, it is of critical importance that the Bank's filings with the registrar of Companies be accurate and timely.

6.2 Violations of Code and Reporting
It is the goal of the Bank to ensure that the general public has a confidence in the honesty and integrity of staff members.

A violation of any of the provisions of the Bank's Code of Conduct and Ethic or failure to report a known violation may be cause for disciplinary action, ranging from reprimand to dismissal. Such action is in addition to any criminal or civil liability that might result under applicable laws.

All employees should be encouraged to talk to supervisors, managers and coworkers when in doubt about any situation. Also, all employees must report violations of laws, rules, regulations, or this Code. Such reports should be directed in writing to the Human Resources Department forthwith.

The Executives and employees serve the needs of the shareholders, the community and the Bank's customers and not their personal financial needs. Legal, regulatory and ethical considerations make it mandatory that, Executives and employees avoid any and all conflict-of-interest situations. No policy can refer to every potential conflict, but each employee agrees to be sensitive to the intent of the Board to be beyond reproach in its actions.

6.3 Internet and Social Media Usage
The social media is gaining increasing popularity day by day and is playing a greater role for the Banks in their strategy to increase overall business. In this milieu, the Bank at large, has also strengthened its presence in Facebook, YouTube, and Twitter to connect with its huge customer base as well as its potential customers for providing round the clock information on the Bank's products and services, as well as constant customer education. A critical element in ensuring social media success for the Bank lays with all its stakeholders and the key being its employees who should always strive in enhancing brand value and image of the Bank in the eyes of the public. Refer to the attached Annexure 1 on page 14 of this policy.
7.0 ANTI-BRIBERY AND CORRUPTION

This policy sets out the general rules and principles to which BSBIBL employees adhere. It is communicated to all businesses and employees. This policy explains the procedures through which BSBIBL maintains its high ethical standards and protects its reputation against any allegations of bribery and corruption. Its successful implementation requires pro-active adoption at the following levels:

- BSBIBL employees are required to read and understand all aspects of this policy, and abide by it
- The business of the bank’s overall compliance with the requirements of this policy is the responsibility of the Managing Director.

Policy and Procedure Contents

It is BSBIBL’s policy to conduct business in an honest way, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage.

The BSBIBL is committed to ensuring adherence to the highest legal and ethical standards. This must be reflected in every aspect of the way in which BSBIBL operates. BSBIBL strives for integrity in all their dealings. Bribery and corruption harms the societies in which these acts are committed and prevents economic growth and development.

This is not just a cultural commitment on the part of the bank, it is a moral issue and a legal requirement. Bribery is a criminal offence and corrupt acts expose the Bank and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the bank reputation.

This policy has been adopted by the BSBIBL Bank with approval of the bank board and is communicated to everyone involved in the business to ensure their commitment to it. The board attaches the utmost importance to this policy and will apply a “zero tolerance” approach to acts of bribery and corruption by any of its employees or by business partners working on their behalf. Any breach of this policy will be regarded as a serious matter by the Bank and is likely to result in disciplinary action.

7.1 Bribery and Corruption.

Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.

Corruption is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government.

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. For the purposes of this policy, whether the payee or recipient of the act of bribery or corruption works in the public or private sector is irrelevant.

The person being bribed is generally someone who will be able to obtain, retain or direct business. This may involve sales initiatives, such as tendering and contracting; or, it may simply involve the handling of administrative tasks. It does not matter whether the act of bribery is committed before or after the completion of administrative tasks.
Bribe

Bribes can take on many different shapes and forms, but typically they involve corrupt intent. There will usually be a ‘quid pro quo’ – both parties will benefit. A bribe could be the:

- Direct or indirect promise, offering, or authorisation, of anything of value
- Offer or receipt of any kickback, loan, fee, reward or other advantage
- Giving of aid, donations or voting designed to exert improper influence

Parties Engage in Bribery or Corruption.

In the eyes of the law, bribery and corrupt behaviour can be committed by:

- An employee, officer or director
- Any person acting on behalf of the Company (e.g. our business partners)
- Individuals and organisations where they authorise someone else to carry out these acts

Acts of bribery and corruption will commonly, but not always, involve public or government officials (or their close families and business associates). For the purposes of this policy, a government official could be:

- A public official, whether foreign or domestic
- A political candidate or party official
- A representative of a government-owned/majority-controlled organisation
- An employee of a public international organisation (e.g. World Bank)

Applicability of law

Bribery is a criminal offence in Botswana in which BSBIBL operates, and penalties can be severe. It is therefore in the interests of all BSBIBL employees, to act with propriety at all times. Corrupt acts committed abroad, including those by business partners working on BSBIBL’s behalf, may well result in a prosecution at home.

7.2 Steps to be taken to Prevent Bribery and Corruption.

A. Risk Assessment

Effective risk assessment lies at the very core of the success or failure of this policy. Risk identification pinpoints the specific areas in which BSBIBL faces bribery and corruption risks and allows the company to better evaluate and mitigate these risks and thereby protect the its employees. Risk assessment is intended to be an ongoing process.

B. Accurate Books and Record-Keeping

BSBIBL must ensure that it maintains accurate books, records and financial reporting within all its business units and for significant business partners working on its behalf. BSBIBL’s books, records and overall financial reporting must also be transparent. Accounting must accurately reflect each of the underlying transactions. False, misleading or inaccurate records of any kind could potentially damage BSBIBL.

C. Effective Monitoring and Internal Control
BSBIBL’s businesses must all maintain an effective system of internal control and monitoring of transactions. Once bribery and corruption risks have been identified and highlighted via the risk assessment process, procedures can be developed within a comprehensive control and monitoring programme in order to help mitigate these risks on an ongoing basis.

A. Gifts, Entertainment and Hospitality.

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to BSBIBL's business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

Never acceptable

Circumstances which are never permissible include examples that involve:

- A "quid pro quo" (offered for something in return)
- Gifts in the form of cash/or cash equivalent vouchers
- Entertainment of a sexual or similarly inappropriate nature

As a general rule, BSBIBL employees and business partners should not provide gifts to, or receive them from, those meeting BSBIBL's definition of a government official in section 4 (or their close families and business associates).

Usually acceptable

Possible circumstances that are usually acceptable include:

- Modest/occasional meals with someone with whom BSBIBL does business
- Occasional attendance at ordinary sports, theatre and other cultural events
- Gifts of nominal value, such as pens, or small promotional items
- A variety of cultural factors such as customs, currency and expectations may influence the level of acceptability.

B. Facilitation Payments

Facilitation payments are against this BSBIBL policy and the Bank takes the view that they are illegal.

However, in the event that a facilitation payment is being extorted, or if an employee is forced to pay under duress or faced with potential safety issues or harm, such a payment may be made, provided that certain steps are followed. If an employee is ever placed in such a situation, they must contact the Vice President (Compliance) as soon as possible and the payment must be recorded within BSBIBL’s books and records to reflect the substance of the underlying transaction.

7.3 How to Raise a Concern

As individuals who work on behalf of BSBIBL, employees all have a responsibility to help detect, prevent and report instances not only of bribery, but also of any other suspicious activity or wrongdoing. BSBIBL is committed to ensuring that all employees
have a safe, reliable, and confidential method of reporting any suspicious activity, safe in the knowledge that they can “speak up”.

Reporting a suspected instance of bribery or corruption, benefits both the employee and the Bank. To help facilitate this, BSBIBL has created multiple channels to allow its employees do this.

If the employee is concerned that a corrupt act of some kind is being considered or carried out – either within BSBIBL, by any of its clients or by any of its competitors – they must report the issue/concern to their Line Manager or to the reporting Senior management officer. If for some reason this is not possible, the employee must report it to another Senior Management Officer.

If the employee is not comfortable with speaking directly to a colleague or anyone mentioned above, BSBIBL has introduced whistle blowing policy and reporting facility for all employees and relevant business clients for use.

In the event that an incident of bribery, corruption, or wrongdoing is reported, BSBIBL will act as soon as possible to evaluate the situation. BSBIBL has clearly defined procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind. If employees have any questions about these procedures, they are advised to contact the V P (Compliance).

8.0 Code of Ethics and Conduct Policy Attestation

The bank must ensure that this policy is circulated annually or after any amendments to all employees of all cadres for reading and understanding. Records of attestation should be kept for record. The bank should ensure the contents of this circular is accessed by of all concerned and ensure meticulous compliance.

8.1 Attestation Confirmation

All employees of Bank SBI Botswana Limited are required to give an acknowledgement for having read and understood the Ethics and Conduct Policy annually or after any amendments in the policy.

9. Periodicity of Review of the Policy

9.1 This policy will be reviewed in year 2018. In case of exigencies the policy may be reviewed earlier.

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<th>2.0</th>
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<tbody>
<tr>
<td>Policy</td>
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<td>First Revision date</td>
<td>28th July 2017</td>
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Annexure - I

CODE OF CONDUCT FOR EMPLOYEES IN THE BANK ON USE OF INTERNET OR SOCIAL MEDIA

I. No employee of the Bank shall establish/form/promote any group/community on any internet site which uses the name or logo of Bank SBI Botswana Limited / SBI / State Bank of India or shall become member of any such group or community unless such group is expressly created or permitted by the Bank.

II. If any employee of the Bank is creating any social network profile he/she should create such profile in his/her real name and shall not create any profile by using any identity other than his real name:

III. No employee shall write/express anything in any internet site or social media that may damage the reputation of the Bank or any of its employees.

IV. No employee shall post/express any remarks/views in any internet site or social media which may be defamatory to the Bank or officials or its employees in their official capacity.

V. No employee should criticize the management of the Bank or the business processes or strategies of the Bank or policies of the Bank on any internet site or social media.

VI. No employee shall disclose any information about any employee or customer of the Bank including their personal details on any internet site or social media.

VII. No employee shall without written authority use the name BANK SBI BOTSWANA LIMITED or SBI while expressing any views in any of the internet sites/social media.

VIII. No employee shall engage in collusive behaviour on any internet site or social media, with Bank’s competitors or employees.

IX. No employee shall canvass for any donation, lottery or third party marketing/business promotional activities/affairs on any internet site or social media.
X. No employee of the Bank without obtaining prior written approval from his controller:

a) Shall express any view on any internet site or social media about the operations / business / in general of BANK SBI BOTSWANA LIMITED or any of its officials.

b) Shall post / express any views or opinion on behalf of the Bank or by using his / her official position in the Bank.

c) Shall publish any official information / circulars / memorandum / documents etc. which are of the Bank record.

Annexure - Attestation Form

CODE OF CONDUCT

ATTESTATION FOR EXPRESSION OF VIEWS IN SOCIAL MEDIA / INTERNET BY STAFF / EMPLOYEES

1. I, the undersigned, ______________________________ (FULL NAME) of identity number ___________________ acknowledge that I have read and understood circular dated ________________ on the provisions of the Code of Conduct for Employees of Bank SBI Botswana Limited for expressing views and opinions on Social Media / Internet which I received on the ________________.

2. I shall comply with the above Code of Conduct when using social media and internet. I understand and affirm that any act in contravention / violation of the provisions of Code of Conduct on my part shall be construed as a misconduct and shall amount to disciplinary proceeding against me under appropriate Human Resources Policy as deemed fit by the Bank.

Sign: ________________________________

Date: ________________________________