



Bank Keshavarzi

CODE OF CONDUCT

“We gain the trust of our customers through accountability and complying with rules and regulations.”

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Preface

Relying on Islamic and professional ethics, Bank Keshavarzi has always been seeking value creation for its customers. Accordingly, the Code of Conduct constitutes the guidelines for integrated and consistent conduct of Bank staff. By establishing general principles for the growth and excellence of the organization, complying with rules, regulations, and standards, as well as upholding customers' rights and elevating their trust, it makes a secure working environment free from any illegal activities, and creates a sound competitive atmosphere with other banks. These include compliance, responsibility, sound administration, respect, promotion of integrity, fairness and equality, trust building and accountability, social responsibilities of Bank, and environment protection.

This document is drawn up according to the section 5-1 of Bank Keshavarzi Compliance Policy approved by Board of Directors on November 14, 2019, and also the articles 95 and 98 of the guidelines on "Reformation of Financial Structure of Public Banks", and the requirements supervising corporate governance of public banks as approved by "Money and Credit Council", leading to the approval of the Code of Conduct by Board of Directors, which has to be complied and applied by the whole staff.

1- Responsibility and Accountability

Bank staff is responsible for their own behaviors and decisions. If they happen to violate the rules and regulations, they are held accountable, and the lack of knowledge about rules and regulations of Bank is not a reason to refrain from responsibility. In addition to understanding rules and regulations their jobs, the staff should work in compliance with Code of Conduct.

2- Compliance with Legal Requirements and Code of Conduct

The staff of Bank Keshavarzi and subsidiaries is obliged to follow and remain loyal to rules and regulations. To this end, Bank staff should fulfill their tasks legally, honestly, and ethically. They ought to refrain from violation of rules and regulations.

3- Fair Competition

Bank Keshavarzi follows honest and fair competition. Bank staff is not allowed to trade the internal information of Bank with other banks or customers. Trading and dissemination of the internal information of other banks, not publicly announced, are considered as violation of Code of Conduct and regulations as well.

4- Equitable Treatment

Bank Keshavarzi has founded its long-term relationship with the customers based on mutual trust, interacting with them with fairness and justice. Accordingly, Bank is not following illegal interests and does not abuse customers' information; rather, it protects their information. It presents and explains services accurately and transparently – verbal, written, video, etc. Moreover, it refrains from any information that distracts the customers.

In order to investigate the complaints set forth by the customers, and in line with implementing the article 25 of the law on "Enhancing Sound Administration System and Combating Corruption", Bank Keshavarzi has inaugurated a complaint investigation system through which the complaining customers are able to send their complaints to the supervising body of Bank. Furthermore, there is a call center in operation and accessible for the customers through the following phone number: 021-81301

5- Meritocracy

Meritocracy and employing efficient workforce is an essential principle and the success factor for the approach of Bank toward growing productivity, dynamism, and evolution. The increasing and exponential growth of banking knowledge and consecutive changes of customers' needs necessitate the continuous improvement of the staff qualifications for the purpose of success in organizational competition. Thus, to keep its attention toward development and continuous improvement of personal and organizational capacities as well as human resources enhancement, Bank fills the important positions through evaluation of internal job posting candidates within the framework of a comprehensive appointment system.

6- Knowledge Management

To enhance productivity and to achieve its own goals, Bank pays a special attention to the process of creation, retainment, share, and application of knowledge at all levels, based on culture and technology.

7- Safeguarding Bank Interest

Use of Bank assets and amenities, i.e. human, physical, financial, technological, databased, and informational resources, as well as Bank's brand, logo, and trademark, are allowed merely toward organizational duties and income generation for Bank. Under no circumstances, any use of them for personal interests is authorized. However, sales, rental, and lending Bank assets in compliance with rules and regulations and the internal guidelines towards Bank objectives are permitted. Moreover, any products and services, such as reports, analyses, programs, applications, etc., created by the staff while fulfilling their job duties are deemed as Bank asset.

8- Protecting Confidential Information

The entire banking affairs, including electronic operations, written, audio, video, and verbal ones, regardless of the fact that it may relate to either the staff or the customer, are executed confidentially. This contains keeping secrets, protecting documents and internal information, data security, as well as privacy. In general, identity, financial, occupational, and referral information obtained from the customers are considered confidential and under no circumstance related documents and information will be shared with others without prior permit from legal authorities. Provision of concise information is allowed under permits from legal authorities and it should be transferred securely. Recording voice and telephone calls and taking pictures (using the electronic devices of Bank) are in compliance with the existing laws, and they can be released only by the order of judicial authority.

9- Conflict of Interest

Bank is committed to take any necessary measures to settle the conflict of interest between the customers and Bank, the customers and the staff, and Bank units; nevertheless, if the conflict of Bank interest with the customers is inevitable, it will be settled with utmost efforts within the scope of rules and regulations. Moreover, along with reducing conflict of interests with the staff, arisen from inequality and unfair promotion, Bank endeavors to develop a system for meritocracy.

10- Impartiality

The decisions made by Bank are impartial, based on the legal and ethical aspects only. The personal interests of Bank staff in terms of profit or family and friendly relations with customers ought not to have any impact on their decisions.

11- Communications and Social Media

The official speaker of Bank with regard to media is "Public Relations and International Coordination Department". Facing with journalists and social media, the staff is able to express their views only when they get the permission from this department. In addition, expressing personal opinions in the name of Bank is forbidden.

Creating any websites, weblogs, emails, podcasts, online personal group and pages on internet and social media, making movies, writing books and articles in the name of Bank Keshavarzi is merely vested in "Public Relations and International Coordination Department". Also publication and republication of letters, notices, and statements that are not publicly announced by Bank is a violation of rules and regulations and will lead to punishment based on administrative regulations.

12- Gift Acceptance

Gift is meant to be rewarding any property, benefit, facilities, discount, quittance, special advantage, financial or nonfinancial advantage or right. The staff is not permitted to accept gifts.

13- Risk Management

It is expected that the whole staff are sufficiently aware of the risks of their activities. They are responsible for recognizing and managing the risks of their duties in compliance with policies, guidelines, circulars, and notices.

Performance of managers is resulted from a model taken from the culture of risk and Code of Conduct at Bank. In their role as a leader, managers have to nurture soundness, honesty, and respect in the working environment. Their decision making should be based on the competency and qualifications of the staff and away from any prejudice and partiality, and it should support the staff towards their job procedures and promotion.

Managers are obliged to mitigate risks through the following steps:

- Ensuring that the staff have accurate understanding of Code of Conduct and their loyalty thereby
- Strengthening a sound working environment, endeavoring to remove the obstacles to accurate decision-making, and directing the staff in their decisions
- Ensuring that the staff are fully aware of the risks of their activities and behavior and the means through which they can receive guidelines and counselling
- Ensuring that the staff treat each other with courtesy
- Reporting violations of procedures and HR policies to senior managers

14- Reporting and Whistleblowing

Bank tries to provide a safe working environment via the use of systems and duly procedure so that everyone can blow the whistle on violation of rules, regulations, and unethical behavior anonymously.

15- Corruption, Bribery, and Fraud

Bank advocates any attempts to combat corruption, bribery, and fraud both domestically and internationally within the scope of the rules and regulations issued by regulators. To this end, according to the rules and regulations and guidelines issued by internal regulating organizations, Bank will fight against corruption, bribery, and fraud. The whole staff is committed to safeguard Bank against the risks arisen from corruption, bribery, and fraud, and if any cases discovered, they should report them to the relevant departments.

16- Combating Money Laundering and Financing Terrorism

Bank Keshavarzi is working under the supervision of the Central Bank of Iran (CBI). The policies regarding control and enforcement of combating money laundering and financing terrorism are subject to the directions of CBI. Bank will notify the staff duties through approval of the internal guidelines. In addition, the whole transactions are monitored and analyzed according to the existing standards, and suspicious transactions and dealings are reported to the Financial Intelligence Unit (FIU).

17- International Financial Sanctions

Bank Keshavarzi follows the rules and regulations concerning international financial sanctions set forth by internal regulators, and any cooperation with the persons in the above mentioned sanction list are not permitted even though in the Bank interests.

18- Social Responsibilities

Bank Keshavarzi plays its role for social responsibilities beyond economic interests and with the purpose of realizing sustainable development. Considering the vast area of social responsibilities, and based on Bank values, the following are the goals and activities of Bank Keshavarzi towards public services:

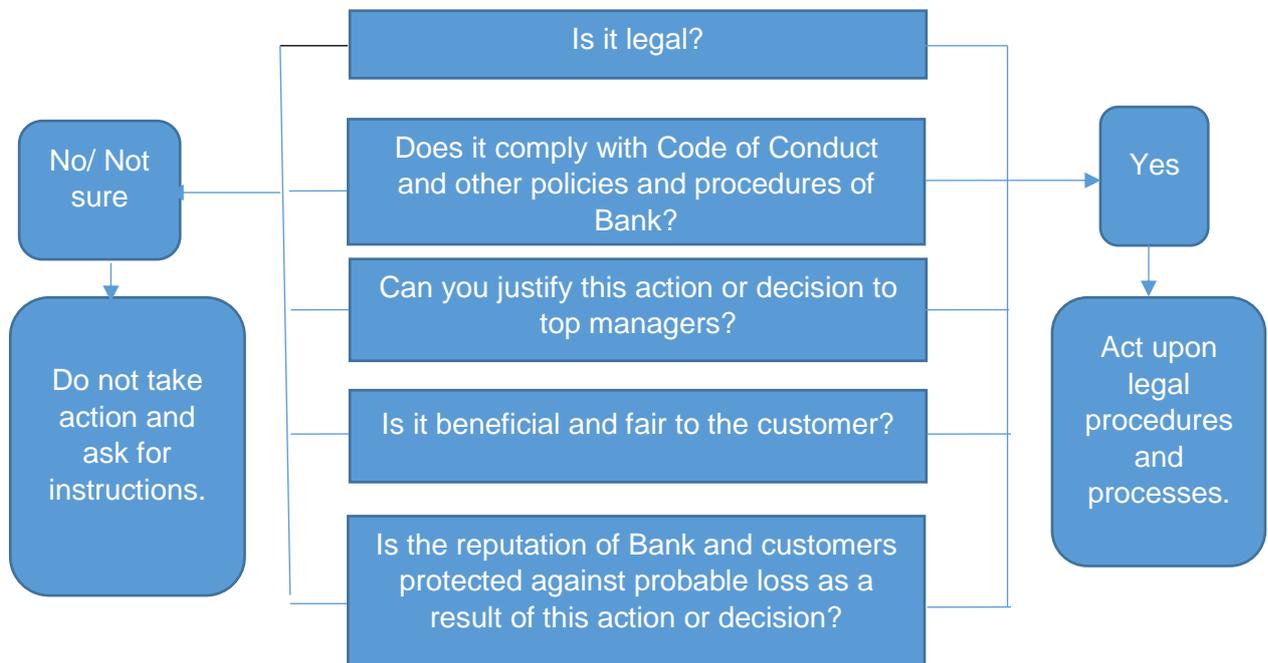
- Elevation of farmers' living condition and subsistence
- Empowerment of rural women
- Development and improvement of agriculture sector
- Supporting investment towards self-sufficiency and enhancement of food industry across the nation
- Injecting capital and directing agriculture projects along with safeguarding natural resources and protecting environment
- Humanitarian activities and charity
- Financial and nonfinancial support of scientific, educational, athletic, cultural, and artistic activities

19- Respecting the Environment

Bank Keshavarzi is one of the principal advocates of protecting environment in Iran. Moreover, due to the mission of Bank in agriculture sector it does its best respectively. Therefore, it has always strived to cooperate with other domestic and international organizations to act as a *green bank*. To this end, the most principal steps taken at Bank are: reforming banking procedures such as developing electronic banking and eliminating paper from communication, development of e-banking infrastructures to reduce customers attendance and also contributing to the reduction of fuel consumption, supporting forest development projects domestically, improvement of water resources consumption, creating competitive advantage for artisans regarding manufacturing and supplying pollution control and reduction equipment, increasing public awareness in terms of environment, amending the regulations on loans towards further safeguarding natural, environmental, and other relevant resources.

Decision Making Tree

In the event of coming up with any ethical or behavioral questions, the following chart may serve as a guideline for decision-making:



And in the event that you are not able to answer yes to all the questions, ask for instructions from top managers.