



NATIONAL BANK OF KENYA LIMITED

CODE OF CONDUCT

Version 1.0

Actions	Names	Name	Signature & Date
Policy Owner	Director Human Resources		
Signed off by	Managing Director & CEO		
Board Approval	Board Minute Number		

CODE OF CONDUCT

1.1 PURPOSE

This policy affirms the Bank's belief in responsible business, social and ethical behaviour from all employees. This policy also clarifies the standards of conduct and behaviour that is expected of all employees.

1.2 SCOPE

This Code of Conduct applies to all Bank employees and provides the framework of principles for conducting business, dealing with colleagues and other stakeholders.

1.3 POLICY

It is the expectation of the Bank that all employees will maintain a standard code of conduct and behaviour. The Bank expects all employees to conduct themselves in a professional, ethical and socially acceptable manner.

Failure to observe these standards will cause an employee to be liable for disciplinary action.

1.4 GENERAL CONDUCT

The Bank expects employees to:

- 1.4.1 Act and maintain a high standard of integrity and professionalism;
- 1.4.2 Be responsible and scrupulous in the proper use of Company information, funds, equipment and facilities;
- 1.4.3 Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees and stakeholders;
- 1.4.4 Perform duties with skill, honesty, care and diligence;
- 1.4.5 Not to engage in any other employment while still in the Bank employment, or run/hold interest in a business that is in competition with the Bank;
- 1.4.6 Abide by policies, procedures and lawful directions that relate to their employment with the Bank and its stakeholders.

1.5 DRESS CODE

- 1.5.1 Employees' attire must inspire confidence, convey a sense of professionalism and promote a positive work outlook, in line with the needs of the industry and our clients;
- 1.5.2 Appropriate attire will be guided by the dress code guidelines issued by management from time to time.

1.6 WORKPLACE CONDUCT

- 1.6.1 As many employees work in an open plan area, it is important that their workstation and or desk remain clean and tidy and free from clutter including boxes, papers and magazines, especially at the end of the day.
- 1.6.2 Any items that require storage should be put away when not in use, hard copy paper files should be kept to a minimum, with soft copies of files stored on the relevant shared drive electronically; sensitive data should be password protected.
- 1.6.3 Employees must ensure that all confidential/sensitive documents are locked away at night.
- 1.6.4 Employees should make sure that their personal belongings and valuables are locked away and secured. The Bank will not be held liable in the case of theft.
- 1.6.5 Smoking is forbidden in the work premises.
- 1.6.6 No employee shall be under the influence of any intoxicating drinks, drugs or stimulants during the hours of duty.
- 1.6.7 Sexual or any other form of harassment is forbidden at the workplace and any such cases will be subject to disciplinary action. For purposes of interpretation, sexual harassment shall include unwelcome solicitation for sexual favours either verbal or physical and threats or coercion for the purpose of obtaining sexual favours.
- 1.6.8 No form of violence, verbal or physical, shall be permitted at the workplace. Any such acts shall result in dismissal.
- 1.6.9 Employees are expected to conduct their affairs in a responsible manner abiding by the laws of the land and should not to engage in activities that will cause pecuniary embarrassment or bring the name of the Bank into disrepute.

1.7 SECURITY

- 1.7.1 Entry to the Bank's premises during and / or outside of normal business hours will be by way of security pass. It is the responsibility of every Bank employee to ensure that this security pass is kept in safe custody and must be returned on demand.
- 1.7.2 If building access devices are lost or misplaced, an employee must notify the line manager/security office immediately so that they can be deactivated.
- 1.7.3 Employees are expected to display their security pass/Identification badges conspicuously at all times while on duty within the Bank premises.
- 1.7.4 Suspicious persons, items and/ or suspected security breaches, should promptly be communicated to respective Line managers for appropriate action and/or escalation to the Security Department for investigation and action.

1.8 BANK'S ASSETS AND PROPERTY

- 1.8.1 Employees should take good care of Bank assets and property and ensure it is used for the purpose for which it was designed and in accordance with any relevant operating instructions or procedures and properly maintained / serviced as directed.
- 1.8.2 Employees will be expected to use the internet in a responsible manner that will ensure resources are not wasted and productivity does not suffer.
- 1.8.3 Employees provided with a laptop and/or mobile phone by the Bank will be expected to safeguard the device as well as the data stored on it as per the bank's ICT security policy.
- 1.8.4 Bank telephones should be primarily for official use. Employees are expected to ensure telephone calls do not take an unnecessarily long time to the detriment of other activities.
- 1.8.5 An employee who causes the Bank to sustain a loss, shortage or any damage as a result of dishonesty, negligence or want of care will be held to account.

1.9 COMMUNICATION

- 1.9.1 Only an authorized employee can sign or execute official documents on behalf of the Bank, and/or engage in discussions about the Bank with external parties as per the Bank's Delegated Authorities Policy.
- 1.9.2 Employees will be expected to maintain strict confidentiality of any information they may come across in the normal course of their duties as per the Bank's Information Confidentiality Policy.
- 1.9.3 The Bank's letter head will only be used by authorised employees and only when conducting official Bank business.

1.10 DATA AND INFORMATION CONFIDENTIALITY

- 1.10.1 All staff should maintain total confidentiality of the bank's and its customer's data and information. The banks' data and information should not be shared with any external party or internal party except under court orders and by bank authorized staff only.
- 1.10.2 Apart from authorized bank staff no other staff member should access, divulge, share or release the Bank's or customer's data and information.
- 1.10.3 Access to customer data and information is restricted to only bank authorized staff and even then, access only when there is a reason for the staff to access or use the data for bank work.
- 1.10.4 Bank and customer's data and information confidentiality breaches will be liable to both applicable legal and bank action including termination of employment.

1.11 IMPLEMENTING POLICY/PROCEDURE(S)

The Bank will employ the following procedures in implementing this code:

1.11.1 Disciplinary & Grievance Procedure;

1.11.2 Conflict of interest policy;

1.11.3 Dress code guidelines;

1.11.4 Communication policy;

1.11.5 Information confidentiality policy;

1.11.6 ICT security policy;

1.11.7 Anti-bribery policy;

1.12 IMPLEMENTING RESPONSIBILITY

1.12.1 Board of Directors

1.12.1.1 To consider and approve this code and its revisions.

1.12.2 Role of Managing Director & CEO

1.12.2.1 To review proposed changes to the code and propose them to the board for approval.

1.12.3 Role of Human Resources

1.12.3.1 To ensure implementation of this code.

1.12.3.2 To draft and obtain approval for changes to the code.

1.12.3.3 To provide training to employees on this code.

1.13 POLICY REVIEW

This policy will be reviewed every two years or earlier as may be dictated by circumstances.

Step By Step Disciplinary & Grievance handling Procedures

Procedure	Step By Step Tasks	By Who
Disciplinary	1) Upon report of a breach of Policy by an employee, the line manager conducts Preliminary investigations of the breach and details of the breach of policy by an employee are formally reported to HR on the same day this happens.	Line Manager
	2) HR analyses the breach of policy against the HR Policy and employment Laws applicable and advises the Manager on the next course of action.	Head of Employee / Employee Relations Specialist & HRBP
	3) If the breach is serious, HR drafts a show cause letter within 48 hours of analyzing the breach and sends the show cause to be signed and issued by line manager and a copy filed in the personal file.	Line Manager / HRBP
	4) Employee to respond to show cause within 48hours. Line Manager forwards the response to HR for further action and a copy of the show cause response to be filed in the employee file.	Line Manager / HRBP
	5) Where there is need for an investigation to be conducted, the Security team conducts investigation and presents their report to HR and the line Division	Head of Security & Investigation
	6) HR Director reviews and act on investigation report or response to show cause letter and close case or sanction disciplinary hearing.	HR Director
	7) Disciplinary Hearing Notification is send out to the disciplinary committee hearing and the employee who is at liberty to be companied by a witness of their choice. The Disciplinary hearing should held within 10 days after the show cause response or investigation report is received from employee / security. The Disciplinary Committee shall comprise of: <ul style="list-style-type: none"> ✓ The Line Manager or Division representative ✓ Legal Division representative ✓ Internal Audit representative ✓ Human Resource representative ✓ Security & Investigation representative where an investigation report has been prepared These representatives should be of a higher rank to the employee concerned.	Disciplinary Hearing Committee.
	8) The HR representative briefs the disciplinary panel on the facts about the case clearly indicating the policy breached and the steps taken before the	HR Representative

	commencement of the hearing.	
	9) Disciplinary Hearing Committee proposes the disciplinary actions within 24 hours of the hearing through the minutes and recommendations.	Disciplinary Committee
	10) HR Director and Divisional Director determine the Disciplinary action from the hearing minutes and committee recommendations and forward it to CEO for approval.	HR & Divisional Director.
	11) The CEO review and approves the recommended action within 24 hours of receipt.	CEO.
	12) HR Director communicates the decision through issuance of a warning, termination or dismissal letter etc. through the line manager.	HR Director.
	13) Line manager serves the employee with the letter and returns a signed copy to HR to be filed in the employee's personal file.	Line Manager & Employee.
	14) If the employee's services are terminated, the employee is expected to complete the handover form and the clearance certificate. The handover notes will be forwarded to HR together with the acknowledged termination or dismissal letter and the employee will proceed with the clearance process.	Line Manager & Employee
	15) ICT is advised of Employee Exit and requested to deactivate the relevant systems.	HRBP & ICT Specialist
	16) Certificate of Service is drafted and provided to the Employee after handing in the duly filled clearance forms (exit interview and handover forms).	Payroll Specialist
	17) Payroll calculation of final payment which employee signs and confirms the Bank does not owe him/ her any money.	Payroll Specialist
	18) Where an employee appeals against the decision, the appeal letter is received by HR Director who will review the appeal and make a determination. The employee is expected to appeal within 7 days from the date of the termination letter.	HR Director
	19) Appeal Hearing Committee is notified and the employee invited for appeal hearing which should be concluded within 5 days and an appeal outcome forwarded to CEO for approval.	HR Director & Appeal Committee.

	20) The appeal outcome is communicated to employee through the line manager if the employee is still in service or through HR if the employee left the Bank's services.	Line Manager / Head of Employee Service / HRBP.
Grievance	1) Employee reports harassment by the fellow colleague or line manager to either line manager or HR.	Employee
	2) Line manager or HR conducts Preliminary investigations of the harassment and advises the aggrieved employee on the next course of action. Which may include sorting the matter internally by hearing the accused party with a view of reconciling the two employees or escalating the same to a disciplinary hearing committee	Line Manager / Head of employee Services.
	3) If the decision is to go for an internal settlement, the person mandated to handle the case reports to HR the conclusion for documentation and future reference.	Line Manager / Head of employee Services.
	4) If the decision is to have a disciplinary hearing, then process flows as the Disciplinary procedure.	Line Manager / Head of employee Services.
Dress Code	Step By Step Tasks	By Who
Dress Code	1) On breach of Dress code through improper dressing, the line manager requests the employee to go home and change.	Line Manager
	2) On second offence or if the Employee does not obey the issued instruction, the Line Manager in consultation with HR (Employee Relations) issues a show cause letter to the employee.	Line Manager, HRBP or Employee Relations Specialist
	3) If the answer given is not satisfactory line manager escalates the case to HR for Disciplinary process to commence.	Line Manager &HRBP