



## **Code of Ethics & Whistleblowing Policy**

**Abridged Version**

**Confidential Document  
(For Internal Use Only)**

**Purpose**

The Policy is a guiding document to foster ethical conduct, integrity, and responsible governance within Bank One Limited (hereinafter referred to as the 'bank'). It underscores a commitment to customers, employees, and the community, enhancing bank-client relations and fortifying the bank's reputation.

**Scope**

This Policy applies to all employees, including directors and officers, of the bank. It is binding in all professional settings and, in cases of conflict with employment contracts, the Policy takes precedence.

**Core Ethical Principles**

1. **Honesty and Integrity:** Employees must act ethically, openly, and avoid conflicts of interest.
2. **Respect:** Emphasizes treating everyone equally, fostering diversity, and avoiding discrimination.
3. **Responsibility:** Employees and directors are accountable for their actions and must address concerns responsibly.
4. **Confidentiality:** Confidential information must be safeguarded and not disclosed without proper authorization.
5. **Transparency:** Information about products, fees, and responsibilities should be readily accessible and clear.
6. **Workplace Safety:** Prohibits violence, harassment, and any inappropriate workplace conduct.
7. **Insider Trading:** Prohibits trading based on non-public, sensitive information.
8. **Gifts and Inducements:** Strict rules limit gift-giving to avoid perceptions of bribery.

**Whistleblowing**

Employees must report unethical, illegal, or fraudulent actions without fear of retaliation. Reports can cover various issues, including legal breaches, fraud, abuse, or safety concerns. Reports can be anonymous but should provide sufficient detail for investigation.

**Reporting Channels**

Staff must raise any concerns to their line managers or to the Head of Human Resources. Staff may also wish to whistle blow their concerns to the Head of Compliance or the CEO or the Chair of the GNRC, or through an independent whistleblowing hotline. While The confidentiality of whistleblowers is ensured, he/she may choose to remain anonymous.

**Whistleblowing Contact Information**

Employees should report concerns through one of the following channels:

<b>Head of Compliance</b> Bank One Limited 16, Sir William Newton Street Port Louis	Phone No. 2029269  Email: <a href="mailto:HOC@bankone.mu">HOC@bankone.mu</a>
<b>Chief Executive Officer</b> Bank One Limited 16, Sir William Newton Street Port Louis	Phone No. 202 9225  Email: <a href="mailto:CEO@bankone.mu">CEO@bankone.mu</a>
<b>Chair of the Governance, Nomination &amp; Remuneration Committee</b> Bank One Limited 16, Sir William Newton Street Port Louis	Email: <a href="mailto:GNRC@bankone.mu">GNRC@bankone.mu</a>
<b>Whistleblowing Ethics hotline</b> <i>[Deloitte Tip-Offs Anonymous (Pty) Ltd]</i>	Phone No. 8020270001  Email: <a href="mailto:DTOA@TIP-OFFS.COM">DTOA@TIP-OFFS.COM</a> Online: <a href="http://WWW.TIP-OFFS.COM">WWW.TIP-OFFS.COM</a>

**Investigation Process**

The Head of Compliance initiates an investigation, maintaining confidentiality. Cases may be escalated if needed, and serious concerns could involve external parties for investigations.

**Roles and Responsibilities**

- **Board of Directors:** Set ethical standards and initiate disciplinary actions if necessary.
- **Compliance and Management:** Ensure adherence to the Policy and oversee investigations.
- **Employees:** Uphold ethical behaviour and report violations.

**Compliance with Laws and Regulations**

All bank activities must comply with applicable laws, including anti-money laundering and environmental regulations.

**Breach of the Policy**

Breaches may result in disciplinary action, including termination. Retaliation against those reporting violations is prohibited.

**Related Policies**

Employees are required to familiarize themselves with associated policies, including the Conflict of Interest and Outside Business Interest Policy and Anti-Bribery & Corruption Policy.