



CODE OF ETHICS

VERSION 3.0

HUMAN RESOURCE MANAGEMENT DEPARTMENT

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Policy Certification

Title **CODE OF ETHICS**

Version **3.0**

Owned By:	Human Resources Management Department
Prepared By:	HRM Department
Reviewed By:	HR COMMITTEE of BOARD
Approved By:	Board
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01. Purpose/ Objective of the Policy

To have a document disseminating a comprehensive account of the principles, conduct, values, ethics, etc to be followed by Employees.

- Bank expects all its Employees and Officers to abide by the Code of Ethics. Hereinafter in this Code, the phrase, “Official” shall be used to mean Award Staff and Officers”.
- All possible steps to ensure and protect the interest of the Bank and discharge of duties with utmost integrity, honesty, devotion and diligence.
- Conduct of duties shall be in accordance with the Code of Ethics in letter and spirit. All actions need to demonstrate and evidence the principle of acting in good faith and without negligence.
- Good Conduct and discipline shall be maintained at all times and courtesy and attention shall be shown to all persons in all transactions and negotiations.
- In the performance of Official duties or in the exercise of powers conferred, action shall be taken in the best judgment except when acting under the direction of Official superior.
 - Provided wherever such directions are oral in nature, the same shall be confirmed in writing by his superior Official.
- While covering a wide range of business practices and procedures, these standards cannot and do not cover every issue that may arise, or every situation where ethical decisions must be made, but rather set forth key guiding principles.

02. Scope of the Policy

Applies to all award staff and officers of the Bank.

03. Regulatory reference

Not Applicable

04. Policy statement and details

I. Observance of Secrecy and Confidentiality

Strictest secrecy shall be maintained in the Bank's affairs and the affairs of its constituents and information of confidential nature shall not be divulged directly or indirectly either to a member of the public or to an outside agency or to any other employee of the Bank not entitled to such information unless:

- i. divulging of such information is in accordance with the law or in accordance with the practices and usages customary amongst Banks;
- ii. compelled to divulge such information by Judicial or other Authority;
- iii. Instructed to do so by a superior Official in the discharge of the duties.

II. Workplace Behaviour

1. Wearing Formal Attire to Office:

- a) Every official shall wear the ID card provided to him / her. The ID card should be clean in appearance and the letters should be legible to customers.
- b) All Officials shall wear neat and crisp; wrinkle free Indian / Western formal dress with clean shoes / footwear.
- c) All officials shall ensure personal hygiene and grooming. They shall keep their hair properly combed and men must be clean shaven and / or with trimmed beard and moustache.

2. Usage of personal mobile phones: Personal cell phones of all officials at Branches shall be kept switched off during business hours.

3. Punctuality: All officials shall be present at the Branch / Office 15 minutes before the start of day for that Branch / Office. All officials for whom biometric attendance is enabled shall record both entry and exit on days on which they attend Office.

4. Consumption of intoxicating drinks and drugs

- a) An official shall strictly abide by any law relating to intoxicating drinks or drugs in force in any area in which he may happen to be for the time being;
- b) An official shall not be under the influence of any intoxicating drink or drug during the course of his duty and shall also take due care that the performance of his duties at any time is not affected in any way by the influence of such drinks or drug;
- c) An official shall refrain from consuming any intoxicating drink or drug in a public place;
- d) An official shall not appear in a public place in a state of intoxication; and
- e) An official shall not use any intoxicating drink or drug in excess.

5. Prohibition of sexual harassment of working women

- a) No Official shall indulge in any act of sexual harassment of any woman.
- b) Every Official who is in-charge of a work place shall take appropriate steps to prevent sexual harassment to any woman at such work place.
- c) For the purpose of this code, sexual harassment includes such unwelcome sexually determined behaviour (whether directly or otherwise) as :
 - i. Physical contact and advances;
 - ii. A demand or request for sexual favours;
 - iii. Sexually coloured remarks;
 - iv. Showing pornography; or
 - v. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

III. Employment of members of family of Bank Officers in Firms enjoying the Bank's clientage and grant of facilities to such Concerns

1. No official in the Bank shall use official position or influence directly or indirectly to secure employment for any person related, (whether by blood or marriage) either to the official or to the official's spouse, whether such a person is dependent on the person or not.

2. No official, shall, except with the prior permission of the Competent Authority permit his son, daughter or any other member of his family to accept employment in any private undertaking with which he has official dealings or in any other Undertaking having to his knowledge official dealings with the Bank.

Provided that where the acceptance of the employment cannot await prior permission of the Competent Authority or is otherwise considered urgent, the matter shall be reported to the Competent Authority within three months from the date of receipt of offer of employment; and the employment may be accepted provisionally subject to the permission of the Competent Authority.

3. No official shall, in the discharge of his official duties, knowingly grant or authorise the grant of any advance or banking facilities to or enter into or authorise entering into by or on behalf of the Bank any contract, agreement, arrangement or proposal in any matter or give or sanction any contract or loan to any undertaking or person, if any member of his family is employed in that Undertaking or under that person or if he or any member of his family has interests in such matters or contracts in any other manner and the official shall refer every such matter or contract or loan to his superior officer and the matter or contract or loan shall thereafter be disposed off according to the instructions of the Authority to whom such reference is made.

IV. Taking up outside employment

1. No official shall, except with the previous sanction of the Bank, engage directly or indirectly in any trade or business or undertake any other employment :

Provided that an official may, without such sanction undertake honorary work of a social or charitable nature or occasional work of a literary, artistic, scientific, professional, cultural, educational, religious or social character, subject to the condition that his official duties do not thereby suffer but he shall not undertake or shall discontinue such work, if so directed by the competent authority after recording reasons for the same.

2. Every official shall report to the Bank, if any member of his family is engaged in a trade or business or owns or manages an insurance agency or commission agency.
3. No official shall, without the previous sanction of the Bank, except in the discharge of his official duties, take part in the registration, promotion or management of any Bank or other Company which is required to be registered under the Companies Act, 1956 (1 of 1956) or any other law for the time being in force or any Co-operative Society for commercial purposes :

Provided that an official may take part in registration, promotion or management of a Co-operative Society registered under the Co-operative Societies Act, 1912 (2 of 1912) or any other law for the time being in force or of a literary scientific or charitable society registered under the Societies Registration Act, 1860 (21 of 1860) or any corresponding law in force.

4. No official shall accept any payment, in the form of fee, remuneration, honorarium and the like in cash or kind for any work done by him for any public body or any private person without the sanction of the Competent Authority.

5. No official shall act as an Agent of or canvass business in favour of Insurance Company or Corporations in his individual capacity.

V. Commitment towards external Stakeholders

The Bank'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.

1. While maintaining a competitive outlook in the market, the practices listed below shall be followed :
 - Transparency in all business dealings.
 - Conduct of business in accordance with applicable laws and regulations.
 - Respecting the confidentiality, privacy and intellectual property of external stakeholders.
 - Transfer of accurate and complete information from and to customers while complying with internal proprietary policies, data protection laws and any contractual obligations.
 - Avoiding conflict of interest in business dealings for the customer.
 - Fair hearing to any concerns from our customers while acting promptly on the resolution.
 - In terms of supplier relationship, the Bank's protocols on pricing quotation, Service Level Agreements, 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.
2. To maintain the spirit of fair dealings with any external body, no Official shall partake in any of the following activities :
 - 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 authorisation of money, gifts, or any other forms of bribe and corruption with the customers.
 - Offering 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 vis-a-vis other organizations in the market.

VI. Contribution to Newspapers, Radio etc.

1. No official shall except with the previous sanction of the competent authority, own wholly or in part or conduct or participate in the editing or management of any newspaper or any other periodical publication.
2. No official shall except with the previous sanction of the competent authority or except in the bonafide discharge of his duties participate in radio broadcast or contribute any article or write any letter either in his own name or anonymously or in the name of any other person to any newspaper or periodical or make public, or publish or cause to be published or pass on to others any document, paper or information which may come into his possession in his Official capacity.

3. No official shall except with the previous sanction of the competent authority publish or cause to be published any book or any similar printed matter of which he is the author or not or deliver talk or lecture in public meetings or otherwise:

Provided that no such sanction is required if such broadcast or contribution or publication is of a purely literary, artistic, scientific, professional, cultural, educational, religious or social character.

VII. Expressing views on Social Media

1. No official shall establish/form/promote any group/community on any internet site which uses the logo of Indian Bank or shall become member of any such group or community unless such group is expressly created or permitted by the Bank. Usage of Bank's logo/ colour scheme is prohibited.
2. No official shall either in his/her name or by using any ID / name other than his/her name create profile in any social network / media or participate in any other social network profile/page created by Third Party to express / post any views therein in relation to the Bank in general.
3. No official shall write/express anything in any internet site or social media that may damage the reputation of the Bank or any of its employees.
4. No official 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.
5. No official shall 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.
6. No official shall disclose any information about any employee or customer of the Bank including their personal details on any internet site or social media.
7. No official shall, without express authority, use the name "Indian Bank" while expressing any personal views in any of the internet sites/social media on any topic which could be misconceived / misleading as views of the Bank. If such views are expressed, it has to be specifically stated that it is the views of the individuals / author and does not represent the views of the Organisation / Bank with a specific disclaimer clause.
8. No official shall engage in collusive behaviour on any internet site or social media, with Bank's competitors or employees.
9. No official shall canvass for any donation, lottery or third party marketing/business promotional activities/affairs on any internet site or social media.
10. No official shall disclose on any internet site or social media any information which he/she has received as an employee of the Bank for internal circulation only.
11. No official of the Bank without obtaining prior written approval from the Competent Authority :

- a) Shall express any view on any internet site or social media about the working or the business of the Bank or generally about Indian Bank or any of its Officials.
- b) Shall post/express any views or opinion on behalf of the Bank by using his/her Official position in the Bank.
- c) Shall publish any official information/ circulars/ memorandum/ documents etc. which are records of the Bank.

VIII. Demonstrations

No Official shall engage or participate in any demonstration which is prejudicial to the interests of the sovereignty and integrity of India, the security of the State, friendly relations with foreign States, public order, decency or morality or which involves contempt of court defamation or incitement to an offence.

IX. Joining of Associations prejudicial to the interests of the Country

No official shall join or continue to be a member of an Association, the objects or activities of which are prejudicial to the interests of the sovereignty and integrity of India or public order or morality.

X. Giving Evidence

1. No official shall, except with the previous approval of the Competent Authority, give evidence in connection with any enquiry conducted by any person, Committee or Authority.
2. Where any approval has been accorded, no official giving such evidence shall criticize the Policy or any action of the Government or of a State Government or of the Bank.
3. Nothing in this Code shall apply to any evidence given
 - a) at an enquiry before an authority appointed by the Government, State Government, Parliament or a State Legislature; or
 - b) in any judicial enquiry; or
 - c) At any departmental enquiry ordered by the Competent authority.

XI. Public Demonstrations in honour of Bank Officers

1. No official shall, except with the previous sanction of the Competent Authority, receive any complimentary or valedictory address or accept any testimonial or attend any meeting or entertainment held in his honour or in the honour of any other employee of the Bank provided that nothing in this sub-code shall apply to :
 - a) a farewell entertainment of a substantially private and informal character held in honour of the official or any other employee of the Bank on the occasion of his retirement or transfer or any person who has recently quitted the service of the Bank; and
 - b) The acceptance of simple and inexpensive entertainment arranged by the Association of employees of the Bank.
2. No official shall either directly or indirectly exercise pressure or influence on any employee of the Bank to induce or compel him to subscribe towards any farewell entertainment.

3. No official shall collect subscription for farewell entertainment from any intermediate or lower grade employee for the entertainment of any employee belonging to any higher grade.

XII. Seeking to influence

No official shall bring or attempt to bring any political or other outside influence to bear upon any superior authority to further his interests in respect of matters pertaining to his service under the Bank.

XIII. Absence from duties

1. No official shall absent himself from his duty or be late in attending office or leave the station without having first obtained the permission of the Competent Authority:

Provided that in the case of unavoidable circumstances where availing of prior permission is not possible or is difficult, such permission may be obtained later subject to the satisfaction of the Competent authority that such a permission could not have been obtained.

2. No official shall ordinarily absent himself, in case of sickness or accident without submitting a proper medical certificate :

Provided that in the case of temporary indisposition or sickness of a casual nature, the production of a medical certificate may, at the absolute discretion of the Competent Authority, be dispensed with.

XIV. Anti-Corruption and Bribery

1. Save as otherwise provided in these Codes, no official shall accept or permit any member of his family or any person acting on his behalf to accept any gift.

Note:

- (I) A casual meal, lift or other social hospitality shall not be deemed to be gift.
- (II) An official shall avoid acceptance of lavish or frequent hospitality from any individual or concern having Official dealings with him.

2. On occasions such as marriages, anniversaries, funerals or religious functions where the making of gifts is in conformity with the prevailing religious or social practice, an official may accept gifts from his/her near relatives, but he shall make a report to Competent Authority.
3. On such occasions as specified in sub-code (2) an official may also accept gifts from his personal friends having no official dealings with him but he shall make a report to the Competent Authority.

Note: As a normal practice, an official shall not accept any gift from any person or Institution having official dealings with the official.

4. Dowry: No Official shall :-

- a) give or take or abet the giving or taking of dowry or
- b) Demand, directly or indirectly from the parents or guardian of a bride or bridegroom as the case may be, any dowry.

XV. Compliance with KYC Regulations

Compliance with regulation relating to KYC and Money Laundering has a critical bearing upon the quality and integrity of the Bank's operations and strict adherence to regulatory guidelines is a pre-requisite that cannot be compromised. Towards that end, every official shall exercise utmost diligence in establishing the antecedents of customers at the stage of on-boarding and to maintain appropriate oversight upon the operations in customers' accounts for detecting suspicious transactions.

XVI. Lending and Borrowing

No official shall, in his individual capacity

- a) borrow or permit any member of his family to borrow or otherwise place himself or a member of his family under a pecuniary obligation to a broker or a money lender or a subordinate employee of the Bank or any person, Association of persons, Firm, Company or Institution, whether incorporated or not, having dealings with the Bank;
- b) buy or sell stocks, shares or securities of any description without funds to meet the full cost in the case of purchase of scrips for delivery in the case of a sale;
- c) incur debts at a race meeting;
- d) lend money in private capacity to a constituent of the Bank or have personal dealings with such constituent in the purchase or sale of Bills of Exchange, Government Paper or any other securities; and
- e) guarantee in his private capacity, the pecuniary obligations of another person or agree to indemnify in such capacity another person from loss except with the previous permission of the Competent Authority:
 - i. Provided that an official can give to or accept from a relative or personal friend a purely temporary loan of a small amount free of interest or operate a credit account with a bonafide tradesman or make an advance of pay to his private employee;
 - ii. Provided further that an official can obtain a loan from a Co-operative Credit Society of which he is a member or stand as a surety in respect of a loan taken by another member from a co-operative credit society of which he is a member.
- f) Resort to high-handed recovery practices;
- g) framing non-transparent loan contracts with inadequate disclosures of important terms or non-disclosure of charges;
- h) Violate guidelines on Key Facts Statement (KFS)
- i) Delay in release of movable or immovable property documents on repayment or settlement of loan accounts

XVII. Advance Drawal of Salary

No official shall draw his salary in advance or overdraw his account with the Bank against security or otherwise, without the previous sanction of the Competent Authority.

XVIII. Subscriptions

No official shall, except with the previous sanction of the Competent Authority, ask for or accept contributions to or otherwise associate himself with the raising of any funds or other collections in cash or in kind in pursuance of any objective whatsoever.

XIX. Speculations in Stocks and Shares and Investments

No official shall speculate in any stock, share or securities or commodities or valuables of any descriptions or shall make investments which are likely to embarrass or influence him in the discharge of his duties;

Provided that nothing in this Code shall be deemed to prohibit an official from making a bonafide investment of his own funds in such securities as he may wish to buy.

XX. Indebtedness

An official shall so manage his private affairs as to avoid habitual indebtedness or insolvency. An official against whom any legal proceedings are instituted for the recovery of any debt due from him or for adjudging him as an insolvent shall forthwith report the full facts of the legal proceedings to the Bank.

XXI. Movable, Immovable and Valuable Property

1. Every officer, on his first appointment and every other official, on promotion to a post of an officer in the Bank, shall submit a Return of his Assets and Liabilities giving full particulars regarding :
 - a) the immovable property inherited by him or owned or acquired by him or held by him on lease or mortgage, either in his name or in the name of any members of his family or in the name of any other person;
 - b) shares, debentures and cash including Bank deposits inherited by him or similarly owned or acquired or held by him;
 - c) other movable property inherited by him or similarly owned or acquired or held by him; and
 - d) debts and other liabilities incurred by him directly or indirectly;
 - i. provided that in case of an official who is already in the service of the Bank on date these Codes come into force, shall submit a return in terms of this Code within three months of coming into force of these Codes, the return being with reference to the Assets and Liabilities as enumerated above of the official on the date these Codes come into force.
2. Every officer shall, every year on a date to be specified by the Bank, submit a return to the Bank the details of his movable, immovable and valuable properties including liquid assets like shares, debentures as on 31st March of that year before the 30th day of June of that year.

3. No official shall, except with the previous knowledge of the Competent Authority, acquire or dispose of any immovable property by lease, mortgage, purchase, sale, gift or otherwise either in his own name or in the name of any member of his family:

Provided that the previous sanction of the Competent Authority shall be obtained by the official, if any such transaction is

- a. with a person having official dealings with the official
 - b. Otherwise than through a regular or reputed dealer.
4. The Bank may at any time, by a general or special order, require an official to furnish within a period to be specified in the order a full and complete statement of such movable or immovable property held or acquired by him or on his behalf or by any member of his family, as may be specified in the order. Such a statement shall, if so required by the Bank, include the details of the means by which or the sources from which such property was acquired.

XXII. Vindication of acts and character of an official

No official shall, except with the previous sanction of the Bank, have recourse to any Court or to the press for the vindication of any official act which has been the subject matter of adverse criticism or an attack of a defamatory character:

Provided that nothing in this Code shall be deemed to prohibit an employee from vindicating his private character or any act done by him in his private capacity and where any action for vindicating his private character or any act done by him in private capacity is taken, the Official shall submit a report to his immediate superior within a period of 3 months from the date such action is taken by him.

XXIII. Restrictions regarding marriage

1. (a) No official shall enter into, or contract a marriage with a person having a spouse living and
(b) No official, having a spouse living, shall enter into or contract a marriage with any person

Provided that the Bank may permit an official to enter into, or contract any such marriage, as is referred to in clause (a) and clause (b) if it is satisfied that:

- i. such marriage is permissible under the personal law applicable to such official and the other party to the marriage; and
 - ii. there are other grounds for so doing.
2. An official who has married or marries a person other than of Indian Nationality shall forthwith intimate the fact to the Bank.

XXIV. Manager and Leader responsibilities

As a progressive Organization, Managers and Leaders have a special responsibility to demonstrate our values through their actions. As Managers and Leaders, an official 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. One 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 Manager or senior leader, officials therefore additionally accountable for the following:

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

XXV. Safeguarding Bank's assets and resources:

- a. Protect the Bank's assets & resources, tangible as well as intangible, from theft, waste, misuse, loss and damage
- b. Use the Bank's assets & resources, both physical and intellectual for approved purposes only.

XXVI. Individual conduct & behaviour:

- a. No official shall suppress/mis-represent incomplete or wrong information about self, family members and dependents.
- b. No official shall claim any benefit/facility from bank for self or dependents by mis-representing guidelines/dependent criteria.
- c. No official shall resort to any assistance from customers for official purposes/visits.
- d. No official shall suppress/mis-represent any information which is desired to be escalated to higher authority.
- e. Report a conduct that can be detrimental to the interests of Bank or its stakeholders.
- f. Endeavor to address and resolve stakeholder's concern promptly
- g. Act with diligence in keeping with our role as custodians of public money
- h. Strive to provide a polite, courteous and dignified experience to our stake holders
- i. Learn continuously, build skills, share knowledge and create a learning environment together
- j. Embrace opportunities to develop eco-friendly systems and processes for a sustainable corporate governance.
- k. Commit ourselves to produce positive and lasting impacts in our communities and engage to promote ecological, social and economic improvements

05. RESOURCES

Not Applicable

06. ROLES & RESPONSIBILITIES

If any question arises as to the application or interpretation of any of these Codes, it shall be referred to the MD & CEO for a decision.

07. ROLE OF INTERNAL AUDIT AND COMPLIANCE

- Annual Management Audit by CO: Inspection
- Vetting of Policy by CO: Compliance during review

08. REVIEW OF POLICY

- Three years or next review
