

Code of Conduct

All employees of United Finance Limited (“the Company”) are required to abide by the Company’s Code of Conduct (“Code”). It reflects the Company’s commitment to high standards of business ethics to do what is fair, right and legal.

The employees must understand and follow the Code in both letter and spirit. The preservation of our reputation is dependent on strict adherence to its principles. The particular issues that the Code addresses are detailed below:

1. COMPLY WITH LOCAL LAWS AND REGULATIONS

We must understand and comply with all applicable local laws, rules and regulations of any government, regulatory organisations or other professional associations governing our professional activities and are individually responsible for complying with them. We will never knowingly violate laws or willfully neglect our legal and regulatory responsibilities.

We must maintain the highest ethical standards in carrying out our business activities. We must act with integrity, honesty and prudence in all circumstances and at all times.

2. MAINTAIN PERSONAL INTEGRITY

Everything we do and every decision we make shall be guided by principles of honesty, fair dealing, respect and high ethical standards.

To earn and retain the trust and respect of each other within the Company as well as our external stakeholders including regulators, customers, suppliers, shareholders and the general public – honesty, integrity, courtesy, fairness and highest ethical standards must underlie everything we do and every decision we make. We shall refrain from availing unfair advantage of anyone or gaining through manipulation, concealment, abuse of privileged information and misrepresentation of facts.

3. AVOID EXTERNAL INFLUENCE TO GAIN ADVANTAGE DURING EMPLOYMENT

We shall not use any type of external influence such as use of any family, social, professional or political connections and/or individuals in positions of power or organisations and bodies to exert pressure on the management of the Company to confer or grant any advantage or exception.

4. ENGAGE IN LEGITIMATE TRANSACTION

We shall refrain from transactions with individual or organisation involved in drug trafficking, money laundering or any other criminal activities.

5. REJECT BRIBERY, CORRUPTION AND FRAUD

We must not offer or accept bribes or engage in any form of forgery or corruption that reflects adversely on our professional reputation, integrity or competence.

We must also be on guard against those who would attempt to use our products and services to further illegal activities and we must report suspicious activities and transactions to the appropriate persons and authorities.

5.1 Gifts, Entertainment, Other Benefits and Payments:

We must not accept gifts, benefits, compensation or consideration that compete with or might reasonably be expected to compromise our own or another’s independence and objectivity.

Generally, gifts of more than nominal value of Tk 1,000/- are not acceptable. Detailed information of gifts exceeding this description will be recorded in a register for Management’s notification.

6. PROTECT THE COMPANY’S INFORMATION AND ASSETS

We shall protect the Company’s assets and safeguard the confidentiality of non-public information of the Company and its stakeholders. Some of the specific commitments are:

6.1 Disclosure of Company’s Information: We are all responsible to ensure that the public disclosure of information concerning the Company is timely, factual, and accurate and

made in accordance with applicable regulatory requirements of the Company’s policy related to disclosure. We should not disclose any non-public financial information to anyone within or outside the Company unless approved by the management. The Company has designated the Company Secretary as authorized spokesperson to ensure that material information about the Company is disclosed properly and only, she/he should respond to inquiries from shareholders or media.

6.2 Disclosure of Information to Family and Friends: We should disclose information related to involvement of our spouse and close family members working in the same industry in competing organisations. We should protect interest of the Company and should not share any non-public information of the Company or any information regarding stakeholders of the Company with our spouse, family members and friends.

We shall act with high standard of integrity and refrain from divulging confidential and secure information during service period and even after resignation or retirement.

6.3 Use and Disclosure of stakeholder’s Information: Information obtained directly or indirectly from a stakeholder may be used or shared with others only for the specific purpose or transaction for which it was given or collected and cannot be disclosed without the consent of the concerned stakeholder. In case of a legal action such as a court order, we must be careful to disclose only the information that is warranted in that situation. Any information of government agencies shall not be disclosed without the prior approval of competent authority.

When in doubt, we shall not disclose without seeking advice from a superior official.

6.4 Insider Trading: We must act with honesty, integrity and avoid making personal gains through dealing when in possession of insider information. Insider Trading is dealing in relevant investments such as shares, bonds and options while in possession of non-public price sensitive information. Insider trading includes giving tips to another person or dealing on behalf of relatives, friends or any other third parties based on insider information.

6.5 Protecting Company’s Interests and Assets: The Company’s assets, including premises, technology, systems, products, strategies, business plans, operations, data and client relationships are property of the Company and should be used only for legitimate business purposes. When making use of Company’s assets, such as, vehicles, telephones, computers or related software, our use must be reasonable and appropriate.

We must not act to ensure our own benefit at the cost of the Company. We shall protect the Company’s interest as well as ensure fair treatment while selecting vendors, suppliers or third parties for any organisational purpose.

6.6 Usage of IT Infrastructure: All usage of computers and software shall be limited to business purposes. Spending time on computer/mobile games, videos or internet browsing not purported to job is prohibited.

We shall not reveal or share password information with others. Any sharing/using/accessing of password or any IT user information would be considered as strict breach of the Code. Consequences of such violation can lead to termination of employment.

7. ENSURE LEGITIMATE USAGE OF OTHERS’ INTELLECTUAL AND INTANGIBLE PROPERTIES

We shall be careful to safeguard the intellectual and intangible property rights of individuals and organisations. We shall not use the logo or any proprietary branding symbol, insignia, corporate brand or goodwill of any other organisation unless permitted by way of specific consent or agreement.

8. AVOID CONFLICT OF INTEREST

We must make full and fair disclosure of all matters that could

reasonably impair our independence and objectivity or interfere with respective duties to our clients, prospective clients, and employer.

The following are situations where conflicts of interest may arise:

8.1 Misuse of Position: The use, actual or perceived, of our position or connection with the Company to gain or attempt to gain a personal benefit or to confer a benefit upon others with whom we have a common interest, such as family members, friends, business associates or colleagues is strictly prohibited.

This includes receiving any charitable contribution from others or using the power of position to influence others within or outside the Company to make any charitable contribution.

Similarly, we must not seek to gain undue personal benefit from our access to the Company's assets or information or that of any other organisation including other banks and financial institutions.

We shall ensure full disclosure for maintaining any personal relationship with any client/vendor/supplier of the Company such that the Company's interests are paramount.

8.2 Outside Activities: We shall not engage in personal business/commercial activities or take up a second job (part time/commission based or act as an agent of others) during employment with the Company.

However, activities such as training/teaching/social work/publication of literature or artistic works/ receiving foreign award, title/honour or accepting directorship may be allowed with the prior approval of the management of the Company.

Any publication in any media or website or public speaking which is connected with the business of the Company will require the prior approval of management.

Outside activities that can negatively affect the image or compete with any aspect of the Company's business or regulatory bodies are not permitted.

In the event we plan to accept any outside activity, that generates benefit, whether in cash or kind, we must disclose the details of such activity and the benefits to be derived thereby, in writing to the Company and obtain approval in writing before committing ourselves. Remuneration derived from engagement should generally be surrendered to the company.

8.3 Community Involvement: Our personal involvement in community and political affairs will not conflict with the Company's interests or damage its reputation. When we become involved in community activities as individuals, it is important to make it clear that our participation is personal and that the Company is not involved. Some specific examples include:

8.3.1 Political Participation: We shall not run for or actively get involved in political affairs or participate in the activities of any political parties during our employment with the Company.

8.3.2 Public Expression of Views: We shall make any public expression of views on any subject whether in print, electronic or social media in a manner where it is clearly articulated that we are making such expression of views solely in our personal capacity.

9. MAINTAIN CONGENIAL WORK ENVIRONMENT

The congeniality of the work environment is directly dependent on the quality of interaction we have amongst ourselves. We must always demonstrate a spirit of cooperation with fair treatment to all our colleagues.

We are responsible to behave with colleagues in such manner as to keep the environment of the workplace pleasant.

We must not psychologically harass or physically assault any of our colleagues on the grounds of religion, age, gender, family background, ethnicity, personal appearance, marital status or any other reason or make hurtful remarks or threats,

or behave in an intimidating manner.

In addition, we must not make any unwelcome physical, verbal or non-verbal advances of sexual nature towards any of our colleagues or clients.

Any concern regarding any colleague and/or any personal dispute should be communicated to a superior official for resolution.

We shall comply with the Company's dress code and etiquette standards. We must comply with all safety and hygiene practices and procedures introduced by the Company to maintain a safe and hygienic workplace.

10. REPORT LEGITIMATE CONCERNS

We must be alert to immediately report concerns if we suspect any actual, planned or potential behaviour that may breach any laws or regulations and any fraud, theft or illegal activities in the

Company without fear of any retaliation or intimidation. Intimidation against an employee of the Company for raising legitimate concerns under this Code is prohibited.

It is important that we speak up when we have genuine concerns to avoid and deter malpractice and misconduct to uphold the reputation of the Company.

11. BE RESPONSIBLE TO CUSTOMERS

We must ensure that our actions and service quality exceed customer expectations in terms of timely delivery, fairness in treatment, complaint resolution standards, disclosure and transparency.

We shall encourage our customers to engage in businesses that are environment friendly and comply with Bangladesh Bank guidelines.

12. BE RESPONSIBLE TO THE SOCIETY

We shall comply with social/community norms, customs and values to the extent that these do not conflict with established laws and regulations.

13. CONSEQUENCES OF VIOLATION

For employees, compliance with the Code is an integral part of our employment relationship with the Company. Any violation will be taken very seriously and may lead to disciplinary action, ranging from counselling to suspension or termination of employment. Similar consequences may result from any failure to cooperate in any investigation relating to a violation of the Code or retaliating against someone for filing a complaint under the Code. Where breaches of laws and/or regulations have occurred, the relevant external authorities may be contacted. The Company may also choose to pursue lawsuit for any damages or harm it may incur as a result of a violation.

In case of confusion or doubt about any aspect of the Code of Conduct, employees are to consult their superiors for guidance.

I have carefully read and understood all aspects of this Code and agree to abide by it:

Signature : _____
 Employee Name : _____
 Employee ID : _____
 Date : _____