



**ABC Group**  
**Vendor Code of Conduct**

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## **1. About the Code**

### **1.1. Introduction**

Bank ABC is committed to maintaining the highest standards of ethical and professional conduct.

This Code sets out the minimum standards of behavior that is expected by organisations, their representatives and employees, and subcontractors who provide goods or services to Bank ABC (herein referred to as “Vendors”). This Code does not apply to individual contractors, agents or intermediaries, who are required to follow the Bank ABC Code of Conduct.

If a Vendor has any questions about this Code, they should seek advice from the Bank ABC Group Head of Corporate Services.

### **1.2. Bank ABC’s Values**

Bank ABC’s Values – Client Centric, Collaborative and Consistent - guide the way that the Bank ABC Group conducts its business. Bank ABC seeks out Vendors that provide support in meeting these Values and who maintain the highest ethical standard.

### **1.3. Key Principles**

Bank ABC expects all its Vendors to adhere to the following key principles:

- Comply with all applicable laws, regulations and standards;
- Take active steps to disclose and manage any actual, potential, or perceived conflict of interest in relation to the Vendor’s engagement with the Bank.
- Adopt fair and ethical employment practices and take proportionate steps to identify and reduce risks of child labour and modern slavery in their supply chain;
- Provide a safe working environment for their employees and those affected by their activities;
- Take steps to reduce any environmental impact and make a positive social impact with the Vendor’s products and services;
- Have proportionate, up to date and operational business continuity capabilities in place;
- Refrain from offering gifts and hospitality to Directors, employees or contractors of Bank ABC;
- Maintain the privacy and confidentiality of any information relating to the Bank ABC, its employees and its customers that a Vendor may receive in their capacity as a Vendor;
- Maintain appropriate and proportionate Cyber Security measures to prevent the use of their systems for criminal purpose;
- Comply with privacy and data protection laws and the contract terms to protect the Bank customers, employees, assets, and data from risk; and
- Notify Bank ABC of any event or action that causes a breach of this Vendor Code of Conduct or otherwise may affect the good standing of Bank ABC.

#### **1.4. Compliance with the Code**

We ask that our Vendor management team and employees to comply with the standards as set out in this Vendor Code of Conduct.

The Code addresses a number of situations in which issues related to Bank ABC's reputation or ethics may arise. It is recognized that the Code cannot cover all situations and Vendors are required to exercise good sense and sound judgement to make the right decision. In applying such judgement, the following should be considered to make the right ethical decision:

- Do I have all the information that I need to make an informed decision?
- Is it legal and in keeping with the spirit of the law?
- Is it consistent with this Code?
- Could it reflect negatively on my company or Bank ABC?
- How would it look in the media?
- Does it feel right?

Vendors should inform Bank ABC should their business change in a way that may affect their compliance with this Vendor Code of Conduct.

Vendors who submit a proposal to, or enter into a supply agreement with, Bank ABC will be provided with a copy of this Code. Vendors should understand that non-compliance with this Code may adversely affect their commercial relationship with Bank ABC in the future.

Bank ABC reserves the right to monitor, record, review, access and disclose all data and communications created, sent, received, stored or downloaded using Bank resources as it deems appropriate, subject to applicable law and regulations.

The Bank also retains the right to audit Vendor compliance with the Vendor Code of Conduct and other applicable Bank policies at any time. This includes a technical, legal, regulatory, financial, and operational audit of Vendor policies and procedures, including subcontractors if necessary and in some cases may require an on-site inspection of the Vendor's books, records, systems, controls, processes and procedures related to Bank ABC for adherence to the Vendor Code.

## **2. Human (and Labour) rights**

### **2.1 Introduction**

Vendors are expected to meet all applicable employment standards, labour, non-discrimination and human rights legislation.

### **2.2 Slave and Child Labour**

Vendors are expected to take proportionate steps to identify and reduce the risk of child, forced or compulsory labour and modern slavery in their supply chains.

As a minimum Bank ABC expects our Vendors to:

- Prohibit the use of forced labour and give employees, whether local or expatriate, the right and the ability to leave employment when they choose;
- Ensure that child labour is not used and that the employment of young workers adheres to local regulations; and
- Ensure that wages meet legally mandated minimums and industry standards without unauthorized deductions.

### **2.3 *Employment Practices***

Bank ABC expects that its Vendors adopt and follow fair and ethical employment practices. In addition to following all applicable labour law and regulatory requirements Vendors are expected to:

- Treat all employees fairly and not discriminate against any person in its employment based on gender, nationality, age, colour, ethnic origin, disability or religious beliefs;
- Prohibit the illegal use, possession, solicitation, manufacture, distribution, dispensation, transfer or sale of controlled substances (illegal drugs), as well as the unauthorized consumption or possession of alcoholic beverages and abuse of prescription drugs on Bank ABC premises or while working on Bank ABC business; and
- Conduct appropriate and reasonable background screening of all employees, including investigations for any prior criminal activity, to ensure the integrity and good character of the Vendor's employees.

## **3. *Conflicts Management and Business Ethics***

### **3.1 *Conflicts Management***

It is important that our Vendors avoid situations where the interests of the Vendor or an employee of the Vendor conflicts, or appears to conflict, with the interests of Bank ABC or its clients.

A conflict of interest exists, or may be perceived to exist, where a personal, or corporate, circumstance impairs professional judgment or the ability to act in the best interest of Bank ABC or its clients.

Bank ABC expects its Vendors to disclose and manage any actual, potential, or perceived conflicts of interest in relation to their engagement with the Bank.

### 3.2 *Business Ethics*

Bank ABC expects that its Vendors conduct their business in compliance with all applicable laws, rules and regulations of the jurisdictions in which they operate. This includes the expectation that Vendors will:

- Maintain integrity standards in all business activity
- comply fully with all their obligations in relation to all taxes due within the jurisdictions in which they operate. Vendors must not participate in tax evasion or facilitate tax evasion by others;
- respect the human rights, and strive to improve the lives, of the people and communities in which they operate;
- have policies and procedures in place designed to prevent and detect fraud, money laundering, bribery and corruption;
- comply with local governmental environmental standards
- avoid the use of hazardous substances and maintain minimum waste
- comply with international sanctions requirements (as set out by the UN);
- follow a practice of “fair competition” and “fair dealing” by not participating in practices such as entering into non-compete agreements (whether formal or informal) to fix prices, allocate markets or clients, boycotting (or refusing to deal with) certain Vendors or clients (unless legally required to do so) or making the provision of a product or service conditional upon their use of Bank ABC’s products or services;
- demonstrate a commitment to Corporate Social Responsibilities (CRS) such as:
  - Resource efficiency and sustainability
  - Health and safety
  - Staff accommodation and staff treatment
  - Community and economic development
- not enter into any secret agreement or side arrangement with any Bank ABC employee;
- not take any action on behalf of Bank ABC that could be perceived as an attempt to bribe, accept a bribe, or engage in corrupt activity;
- not use any Bank ABC name, or logo, in any advertising, promotional material, press release, client list or similar material without first obtaining written consent from the Bank ABC Group Corporate Communications department. Vendors, and their staff, must not post, share or like anything on social media that could be viewed as a violation of this Code; and
- not engage in, or support, the trafficking of human beings for any purpose.

## 4. Raising Concerns

Bank ABC is committed to integrity, honesty and transparency in everything that we do.

If a Vendor becomes aware, or suspects, violations to this Code or of Bank ABC's policies, standards or procedures, applicable laws or regulations, they are requested to promptly report such violations using the resources described below.

Bank ABC will treat all reports confidentially, fairly and in a timely manner. As long as the Vendor makes the report in good faith Bank ABC will not take any action that would cause them to suffer any detriment, loss of employment or victimization.

Vendors can raise their concerns through the Bank ABC Hotline, email address or mailing address follows:

Hotline: +973 1754 3710  
Email: [gco-wb@bank-abc.com](mailto:gco-wb@bank-abc.com)  
Mail: Group Head of Compliance, Bank ABC, P.O. Box 5698, Manama, Bahrain

If the Vendor does not receive a satisfactory response they may report their concern to the Group Chief Auditor:

Telephone: +973 1754 3350  
Email: [ga-wb@bank-abc.com](mailto:ga-wb@bank-abc.com)

## 5. Version

<b>Version No:</b>	<b>Last Updated</b>
1.0	December 2020
2.0	January 2022
2.1	January 2023
2.2	January 2024