



**CPF Financial Services
Limited**

Code of Conduct Policy

2016

CODE OF CONDUCT POLICY

1.1 Policy objective

The code of conduct will ensure that the professional and personal conduct of staff at CPF Financial Services Ltd is directed by honesty and integrity towards the achievement of the Company's goals and objectives. This policy clarifies the standards of professional and personal behavior that are expected of staff in the performance of their duties at CPF Financial Services Ltd. It gives guidance in areas where staff members need to make personal and ethical decisions. The successful achievement of CPF Financial Services Ltd strategic objectives is highly dependent of the level of integrity of the staff in conducting their day to day responsibilities.

1.1.1 Responsibility

- Group Managing Director.
- Human Resources and Administration Manager
- Heads of Divisions
- Heads of Departments
- Managers.
- All staff.

1.2 Employee loyalty to CPF Financial Services Ltd

By accepting appointment, staff members pledge themselves to discharge their functions and conduct themselves in CPF Financial Services Ltd best interests. Consequently, their first loyalty is to CPF and to no other authority. Staff members shall respect and do their utmost to maintain the character of their position and refrain from any action or conduct likely to compromise them or the Company, whose reputation and prestige they must seek to maintain and embrace.

1.3 Employee regard for authority

At CPF Financial Services Ltd, all staff members shall be under the authority of and answerable to the Group Managing Director. Any hierarchical superior in CPF Financial Services Ltd shall exercise his/her authority in the names of the Group Managing Director.

1.4 Personal conduct and dress code

CPF Financial Services Ltd believes that a proper dress code is essential in developing stakeholder respect and confidence which are necessary for long-term growth and prosperity of the Company. As such, staff members are expected to maintain a professional appearance at all times. On official duties and meetings, staff members should wear formal dress code.

Standards of personal conduct should at all times reflect professional discretion, sound judgment and moderation. It is essential that at all times during normal working hours, every member of staff is dressed in appropriate business attire, properly groomed and conducts himself or herself in a friendly, courteous and professional manner. The grooming code required neatness, tidiness, general hygiene and modesty, sensitive and appropriateness in style.

I.5 Telephone etiquette

The telephone is one of the main contact points that CPF Financial Services Ltd has with the public. To ensure effective telephone communications, staff members should always use the approved greeting (“Good Morning/Afternoon this is CPF Financial Services Ltd. Insert name speaking. How may I assist you?”) and speak in a courteous and professional manner.

All calls should be answered promptly and at a maximum of 3 rings. It is helpful to have a pad and pen/pencil at hand to take messages or to jot down some key facts if the information is detailed or complex.

If you have to put the caller on hold to check something and revert, let him or her know where you are going, what you are doing and roughly how long it will take before you are ready to revert. If you believe it will take a long period of time, take down their phone number and get back to them with your response as soon as possible. This way you do not engage the telephone for excessive length of time as there may be other callers trying to reach CPF.

I.6 Conflict of interest

To avoid actual conflict or the appearance of conflict of interest, a staff member shall not engage in remunerated activity in any field related to CPF Financial Services Ltd line of work without the prior authorization by the Group Managing Director. In the case of the Group Managing Director, the Board of Directors will provide such authorization. These may include but not limited to training, lecturing, providing speeches in conferences, film, radio or television production, submission of literary works such as books, articles and other related activities.

CPF Financial Services Ltd engages staff who are expected to give their full time and attention to their job. In this regard other jobs or private commercial activities during working hours are not permitted.

In addition, during the term of his/her employment a staff member shall not:

- Be remunerated for any work directly competing with any work for the time being carried out by CPF Financial Services Ltd or is substantially similar to his/her normal duties in CPF Financial Services Ltd; or
- Engage in any activity which CPF Financial Services Ltd reasonably considers may be, or become, harmful to the interests of the Company or which might reasonably be considered to interfere with the performance of the staff member’s duties.

The above will not apply in cases where:

- The act undertaken by the staff member has prior written consent of CPF Financial Services Ltd; or
- The staff member has received fees or reimbursements for his/her expenses for activities undertaken outside working hours of CPF Financial Services Ltd and are not related to CPF Financial Services Ltd work.

A staff member shall notify the Group Managing Director of any offer or receipt of honoraria, royalties of other financial compensation in connection with the making of a public statement or publication of a work outside CPF Financial Services Ltd undertaken while still a staff member.

1.6.1 Financial transactions and business interests

A staff member shall conduct his/her personal and/or family financial affairs in such a way as to avoid any reasonable basis for suspicion that his/her actions are an attempt to profit from his/her employment with CPF Financial Services Ltd. As such, a staff member shall notify the Group Managing Director whenever he/she has a direct or indirect personal financial or business interest known to him/her to be under consideration by CPF Financial Services Ltd.

A staff member shall not be associated with the management of, or hold any financial interest in a business undertaking without the authorization of the Group Managing Director. The mere holding of shares in a company shall not be deemed a financial interest within the meaning of this provision unless such holding enables the staff member to exercise control over the company.

A staff member shall avoid any action which contravenes the currency regulations of Kenya.

1.6.2 Affiliation with suppliers

No Employee shall, without the Company's consent, have any appreciable interest in any business enterprise which is a supplier or has a business relationship with the Company. An "appreciable interest" means either being engaged in the management of or having a financial interest in such a business.

1.6.3 Financial procedures

- a) Employees are obliged to adhere to the Company's financial rules and procedures and will be responsible for any damage or loss suffered by the Company through the disregard of such rules and procedures.
- b) Every Employee must account for all monies, cheques and all other documents and property of the Company which come into his possession in the course of employment.
- c) It is incumbent on Employees to obtain receipts from the Company when handing in cash or other property as evidence that the cash or property was handed over. Employees who receive cash or property on behalf of the Company must issue a written document confirming receipt and must place a copy of such documents on record.
- d) Employees who are entitled to Company allowances (such as travel or entertainment expenses) must make use of such facilities in good faith and for the purposes for which they are intended. If there is any doubt as to whether a proposed expenditure in terms of the allowance system will be appropriate, the Employee should consult his Supervisor/Manager.

1.6.4 Public statements

Only the Board of Directors and the Group Managing Director are empowered to issue statements to the Press. The Board of Directors can also, on its own right, make public statements on behalf of the Company. An Employee shall not, unless, expressly authorized by the Group Managing Director talk to the Press, radio or television or other organizations with respect to Company matters.

Employees may not, without first obtaining the Company's written consent, give lectures or speak at public meetings or publish any articles, about the Company's affairs or upon any matter or subject which may affect the Company, whether technical, commercial, or otherwise.

1.6.5 Removal of Company property from Company premises

- i) Nothing belonging to the Company (irrespective of whether the property is of great or small value, whether new, old, used, partially used, scrap, left-over, abandoned or discarded) may be removed from its premises, sites workplaces, without prior written authorisation. Where such authorisation is given, it is necessary to obtain a pass on every occasion, signed by the Head of Department from which the goods originate.
- ii) Where Company property is temporarily removed from Company premises to an alternative site or workplace, the authorizing Manager shall keep and regularly update, a register of such property and its whereabouts and ensure its timely return to the Company premises.
- iii) Where an Employee finds Company property outside of Company premises in unexplained circumstances, he must report first to the Human Resource & Administration Manager or the Security Officer and return the property to the Company premises.
- iv) Where unauthorized possession of Company property occurs, the Employee in question will be suspended from work until such time as a decision on the matter is arrived at.
- v) Upon termination of employment, Employees must hand over all Company property in their possession or under their control, including books, documents, Manuals, specifications, technical and commercial data, computer discs or microfiche (or any copy or any portion thereof) and keys, security cards or any other property.

1.6.6 Collusion with competing companies

Collusion with competing organisations or representatives or agents of such companies is regarded as a serious offence by the Company and could lead to summary dismissal.

Employees must respect confidentiality requirements when representing the Company or engaging in informal discussions with third parties. The passing of confidential information to a third party intentionally or otherwise constitutes a serious breach of trust.

1.6.7 Pecuniary Embarrassment

Serious financial embarrassment, howsoever caused, shall be regarded as undesirable. Under these regulations, the Board of Directors/Group Managing Director may deal with such cases in such manner as might in law be determined, including termination of service.

1.6.8 Gifts and other favours

A staff member shall report to the Group Managing Director any gift, honour, decoration, remuneration or other favour that the staff member receives in the course of the performance of duty immediately upon receipt of the gift, provided that the requirement to report shall only be in respect of gifts or remuneration that are worth Kshs 5,000.00 and above.

I.6.9 Political activities

The Company is essentially non-political in character and shall not allow itself to become or appear to become associated in any way whatsoever with a political party either through its own activities or through the activities of its employees shall not concern itself with the political views or beliefs of members of staff as these are matters of individual and personal discretion. A staff member may be a member of a political party or association and pay his/her contribution provided that such membership does not entail performance by the staff member of any act contrary to this Code of Conduct.

However, where a staff member wishes to contribute actively and directly to the general political and social development activities that are taking place in the region or/and where such an employee feels that his personal aspirations are best satisfied by pursuing a political career, the Company shall require such employee to immediately submit his resignation from the Company's service.

The Company may; however, be willing to consider granting unpaid leave of absence to an individual employee who wishes to stand for an elective political position to cover the period of campaigning, nomination and the polling day. This shall be subject to the understanding that if the person is successful in his candidature his resignation will be effective from the nomination day. Such consideration shall however, only be given in cases of exceptional staff members who have a track record of excellent performance, an impeccable disciplinary record, whose services are considered invaluable to the Company and the reinstatement of such employee shall be subject to the availability of a vacancy.

I.6.10 Public Bodies (non-political)

The Company, as a responsible employer, recognizes its obligations towards the Community as a whole and acknowledges that certain of its senior staff can play a part in public affairs by accepting honorary office in public business, advisory committees, charities, community initiatives etc. Furthermore, representation on respectable associations and/or businesses can be of direct benefit to the Company's interests.

Accordingly, if any individual receives such an invitation to serve, he should consult the Group Managing Director who shall decide whether the acceptance of the invitation is in the Company's best interest. Approval of such a request shall; however, be subject to the provision that the call on the staff member's time arising from such invitation does not noticeably interfere with the staff members' normal work. In addition, such employee shall restrict the participation to ordinary membership.

Members of staff must avoid any possibility of prejudicing the Company's policy or interests while acting as the Company representative or in a public capacity. Staff should be particularly cautious when making statements of policy liable to be reported in the press. Whenever a staff member has prior notice of his having to make a public pronouncement relating to the Company's affairs, the matter should be cleared beforehand with the Group Managing Director.

1.6.11 Conformity to the Laws of Kenya

Every staff member shall avoid any deliberate infringement of the laws of Kenya. Where a staff member has any reason to believe that he/she has infringed a rule or regulation, the staff member shall report the infringement and the circumstances leading to it, to the Human Resources & Administration Manager.

Whenever a staff member is approached by the law enforcement officers in respect of an alleged infringement of the law, the need to testify in court or the need to report at any police station or any judicial office, the staff member shall report the approach to either the Human Resources & Administration Manager or in his/her absence to the Group Managing Director detailing the circumstances leading to the approach in his/her understanding.

A staff member, who in respect of any offence, other than a minor violation of traffic rules, is arrested, charged, convicted, fined or imprisoned shall immediately report the fact in writing to the Group Managing Director.

1.6.12 Contractual and other obligations to third parties

A staff member's indebtedness, contractual or other obligations with a third party shall be honoured by the staff member. As such, a staff member shall avoid any indebtedness to third parties especially where such indebtedness could cause financial embarrassment to the staff member. No staff member shall issue a cheque knowing that he/she has insufficient funds in the bank on which it is drawn.

No staff member shall refer to his/her diplomatic status in any dispute with a third party in circumstances which could create an impression that the staff member intends to take advantage of his/her diplomatic status. No staff member shall use CPF Financial Services Ltd as a sanctuary for avoiding arrest or detention in connection to non payment of debt or failure to honour an obligation.

No staff member shall plead diplomatic immunity in a civil suit without prior written consent of the Group Managing Director. The Group Managing Director shall grant such consent only if he/she is satisfied that the staff member's position in the matter is reasonable.

1.7 Confidentiality and secrecy of information

All staff members are required to preserve the confidentiality of information becoming available to them in the course of their work and refrain from improper use. Other than CPF Financial Services Ltd brochures, newsletters and magazines which can be distributed to all staff members, all other documents shall at all times be treated as confidential and staff members are forbidden from giving out such information which they obtain in the course of performing their duties. It is the responsibility of a staff member who has access to files or other documents of confidential nature, to see to it that proper and adequate arrangements are made for their security. Any breach of confidentiality and secrecy shall render a staff member liable to disciplinary action.

The protection of confidential business information is vital to the interests of CPF Financial Services Ltd. Staff members who improperly use or disclose confidential business information will be subject to disciplinary action.

I.8 Conflict of interest declaration form

Every staff member shall subscribe to the following oath or declaration within two (2) weeks of assuming duty at CPF Financial Services Ltd:

- i) I.....Solemnly declare that I will, in all loyalty, discretion, and conscience, and to the best of my ability, carry out my responsibilities in a manner that will constantly bring credit to and will further ideals, objectives and goals of CPF Financial Services Ltd.
- ii) I will refrain from communicating confidential information to persons within and outside CPF Financial Services Ltd who would not normally have access to such information both during and after the termination of my appointment with CPF Financial Services Ltd.
- iii) I will not during and after the period of my appointment use to private advantage any confidential information that may have come to my possession by reason of my official position.
- iv) I undertake to uphold the honour, prestige and integrity of CPF Financial Services Ltd and to do everything in my power to enhance the image of the Company in the conduct of my public and private affairs as an impartial, non-partisan, independent servant of an international institution and by observing the provision of the Statutes of CPF Financial Services Ltd, the Headquarters Agreement with the Host Government, the Financial Regulations and the Staff Rules.

I.9 Intellectual property

All rights in any work produced by a staff member in the course of his/her duty or with the resources or facilities of CPF Financial Services Ltd, shall be vested in or assigned to CPF Financial Services Ltd unless such rights are waived in writing by the Group Managing Director in favour of the staff member concerned. The Group Managing Director shall consider whether the staff concerned had access to, or the opportunity and means to produce the work in question, with the resources and assistance of CPF Financial Services Ltd and whether it would be in the best interest of the Company in waiving such rights.

2.0 BUSINESS ENTERTAINMENT

Only Employees authorised to do so may incur business entertainment expenses. Entertainment expenses shall be reimbursed to such Employees as may be determined by the Group Managing Director and shall be made against duly filled and signed expense claims forms with applicable bills/receipts attached.

The rate of reimbursement shall depend on the level of responsibility, the nature of work that such Employee performs and the authorised expense limits.

Specific entertainment expenses relating to an organized function or activity of the Company will be reimbursed directly on production of receipts an advance against expenses likely to be incurred may be granted if necessary.

2.1 DRESS CODE

Company Employees shall be neat, clean and presentable to the business environment at all times. The mode of dressing and grooming shall be acceptable and not offensive to the customers, other staff and the public in general.

Employees who are provided with uniform and personal protective equipment must always be in their uniforms while on duty. It shall be considered a breach of discipline to fail to comply with this requirement.

The Company shall ensure that the uniforms issued to members of staff are of high quality and acceptable standard of tailoring.

This policy shall be applicable to all staff during working hours.

It shall be the responsibility of Head of Divisions/Departments to ensure that staff adhere to this code of dressing and are well groomed during business hours. Any staff member who does not comply with the provisions of this policy shall be turned away and their case reported to the Human Resource and Administration Department immediately.

I,have read and understood the above code of conduct and promise to respect , adhere and abide by the principles of the Code and will report any evidence or suspicion of breaches of the Code. I will ensure the Legal rights and due protection of the whistleblower and the accused before, during and after any investigation. I hereby agree to be bound by the principles of the code.

NAME:.....

SIGNATURE:.....DATE:.....

WITNESSEDBY..... DATE.....