



Bandhan
Bank

**BUSINESS RESPONSIBILITY AND
SUSTAINABILITY REPORTING
POLICIES**

Approved on January 18, 2023

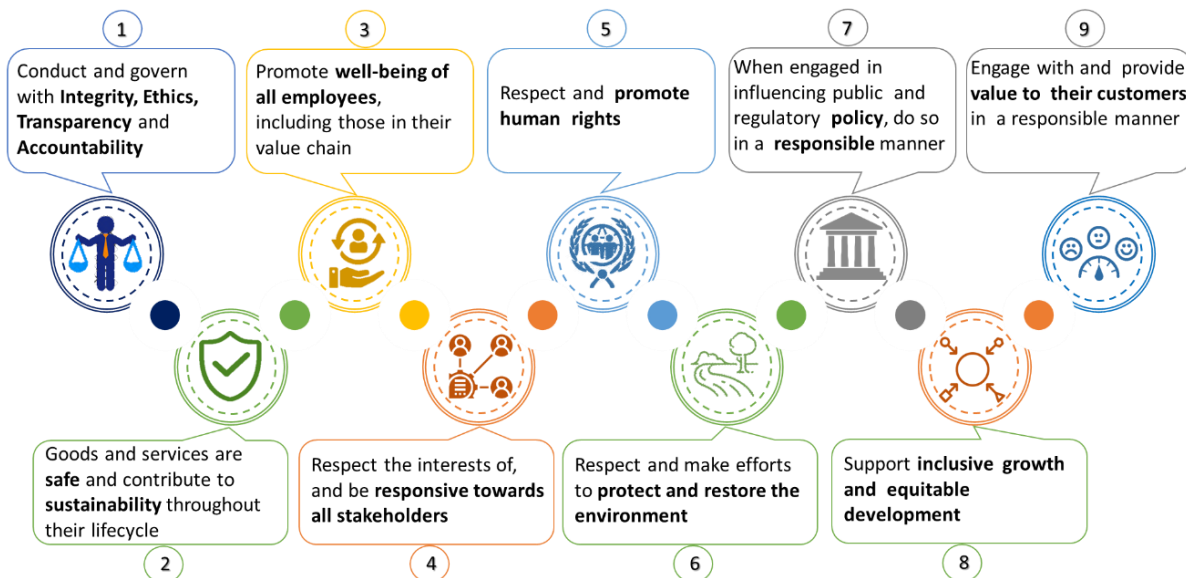
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Business Responsibility and Sustainability Policies

The Securities and Exchange Board of India (SEBI) has mandated the top 1,000 listed companies to enhance disclosures on Environment, Social and Governance (ESG) standards by introducing the new reporting format named, Business Responsibility and Sustainability Report (BRSR). The BRSR requirements are based on the National Guidelines for Responsible Business Conduct (NGRBC), which aims to establish links between the financial results of a business with its ESG performance.

The NGRBC mandates businesses to adopt and report on the following nine principles:

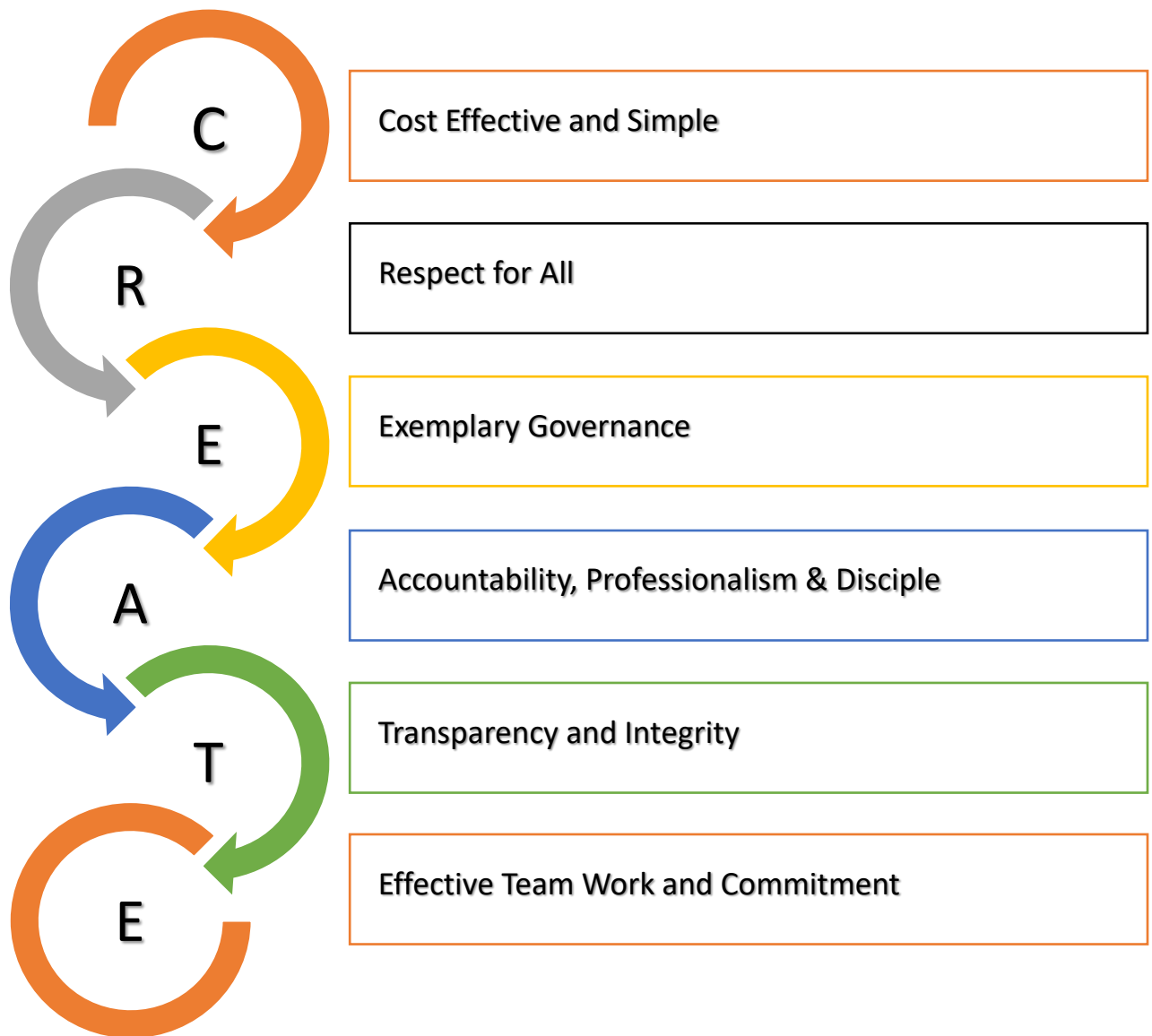


Bandhan Bank is the country's most inclusive and fastest-growing bank that values business responsibility and sustainability principles and has embedded them in the bank's core values as mentioned below. This compendium of BRSR policies collates various policies and practices of the bank that are aligned with the nine principles mentioned above.

1 OUR VALUES VISION AND MISSION

Bandhan Bank is a value-driven bank and operates on the following underlying values. Our values are anchored around our business ethics, consumer focus, and corporate responsibility towards society at large

1.1 Values



1.2 Vision

To be a world-class bank with convenient and affordable financial solutions for all, offered in an inclusive and sustainable manner.

1.3 Mission

To provide our customers with accessible, simple, cost-effective and innovative financial solutions in a courteous and responsible manner. To create value for all stakeholders through a committed team, robust policies and superior systems and technology.

2 PREAMBLE

The BRSR is a notable departure from the existing Business Responsibility Report (“BRR”) and a significant step toward bringing sustainability reporting at par with financial reporting. The reporting requirements were finalised based on feedback received from public consultation and extensive deliberations with stakeholders including corporates, and institutional investors. Further, a benchmarking exercise with an internationally accepted disclosure framework was also undertaken. A few of the key disclosures sought in the BRSR are highlighted below:

- **An overview** of the Bank’s material ESG risks and opportunities, approach to mitigate or adapt to the risks along with financial implications of the same.
- **Sustainability** related goals & targets and performance against the same.
- **Environment-related disclosures** covering aspects such as resource usage (energy and water), air pollutant emissions, greenhouse gas (GHG) emissions, transitioning to a circular economy, waste generated and waste management practices, biodiversity etc.
- **Social related disclosures** covering the workforce, value chain, communities and consumers, as given below:
 - **Employees/workers:** Gender and social diversity including measures for differently-abled employees and workers, turnover rates, median wages, welfare benefits to permanent and contractual employees/workers, occupational health and safety, training etc.
 - **Communities:** disclosures on Social Impact Assessments (SIA), Rehabilitation and Resettlement, Corporate Social Responsibility etc.
 - **Consumers:** disclosures on product labelling, product recall, consumer complaints in respect of data privacy, cyber security etc.

3 SCOPE OF THE BUSINESS RESPONSIBILITY AND SUSTAINABILITY POLICIES

2.1. This compendium on the Bandhan Bank’s Business Responsibility and Sustainability Reporting (BRSR) Policies are framed to fulfil the requirements of 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (‘SEBI LODR’) and the Environmental, Social and Governance (‘ESG’) related disclosures of the Bank.

2.2. The Bank is already preparing and disclosing sustainability reports based on the internationally accepted Integrated Reporting Framework and may cross-reference the disclosures made under such framework to the disclosures sought under the BRSR.

- 2.3. The scope of this compendium of the BRSR policies shall be applicable only to the nine principles as mentioned in the SEBI Circular, the respective departments of the Bank shall be responsible for the execution, and reporting of BRSR related performance³ of the Bank.
- 2.4. The CSR and Sustainability Committee of the Board shall be responsible for the annual review and recommendation to the Board of this BRSR Policies compendium in relation to the nine principles only.
- 2.5. This Business Responsibility and Sustainability Reporting Policies is a compendium of various policies and codes of the Bank being governed by various departments and are subjected to review and changed as and when required by the respective departments. The CSR and Sustainability Committee is not responsible for the review of all such policies covered under this compendium.
- 2.6. In case of any changes to the principal policies, the same will supersede this compendium and the updating of this compendium will be made in the subsequent review.

4 POLICIES ON PRINCIPLE 1 - BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY, AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE

4.1 Essential Indicator: Details of anti-corruption or anti-bribery policy

4.1.1 Policy on Vigilance

The Bank has a comprehensive anti-corruption and anti-bribery policy in the name of “Policy on Vigilance” which can be accessed at the Bank’s website at the following path of the website:

Home>Investor relation>Corporate Governance>Codes & Policies

The “Policy on Vigilance” deals with transparency-related mechanisms and is framed in line with the guidelines of Reserve Bank of India circular no. RBI/2010-11/554/DBS.CO.Fr.MCNo.9/23.04.001 dated May 26, 2011.

4.1.2 Policy on Whistle-Blower Mechanism

The Bank has a comprehensive “Policy on Whistle Blower Mechanism” which deals with the Protected Disclosure Mechanism and is based on the RBI direction on Protected Disclosures Scheme for Private Sector and Foreign Banks. The Policy can be accessed at the Bank’s website at the following path of the website:

Home>Investor relation>Corporate Governance>Codes & Policies

4.1.3 Code of Conduct and Ethics for Employees

Apart from the Policy on Vigilance and Whistle Blower Mechanism, the HR Policy also covers the code of conduct of the employees, which covers the ethics and accountability principles and is reproduced below for ready reference.

4.1.3.1 Ethical Practices

Ethics is about doing what is morally right – being ethical means to act responsibly and in good faith, with due care, prudence and diligence, without allowing own judgments and decisions to be subservient to personal or extrinsic considerations.

An ethical person follows both the letter and spirit of laws and regulations. In managing the Bank’s business, in dealing with each other and in the provision of services, the employees of the Bank must conduct themselves fairly and ethically, mindful of the Bank’s interest.

The Bank is committed to conducting its business with honesty and the highest ethical standards and has zero tolerance towards bribery and corruption.

Although it is common to gather information about the general marketplace including the competitors’ products and services, the Bank wants to compete at all times and in all circumstances.

Some examples of unethical business practices are as follows:

1. Attempt to induce any customer to close the existing account and reopen the same to achieve sales targets.
2. Mis-selling is another example of unethical practice often used in business. It is characterized by the failure to inform fully or to misdescribe the attributes of a financial product resulting in the sale of a product that is unsuitable to the needs of the customer.
3. The window dressing of accounts, such as drawing down on credit lines or shifting term deposits and parking in Savings or Current accounts at month/quarter/half-yearly/yearly ends, only to reverse in the subsequent month.

Raising Ethical Issues

- The Bank encourages all employees to report their concerns and suspected violations of the Bank's Code of Conduct and Ethics, internal policies, external legal and regulatory requirements, etc.
- While the employee may choose to remain anonymous, breaches should be escalated immediately to their supervisor/ HR/ compliance or any other empowered authority under the whistleblower policy.
- The Bank shall conduct prompt and thorough investigations of reported violations and take appropriate corrective action as required.
- The Bank shall not tolerate retaliation against those who in good faith, reports a violation or possible violation of law or policy or misconduct.
- The Bank shall take disciplinary or preventive action as deemed appropriate to address violations of the Code, up to and including termination of employment.
- Violations of the Code may also constitute violations of law, which may result in criminal or civil penalties for the employee.
- Should an employee have any doubts about undertaking any new role, assignment or responsibilities, he should ensure that he fully understands the dos and don'ts of the job, to avoid pleading ignorance when there is a breach or lapse.
- All employees are required to cooperate fully with authorized internal and external investigations. Making false (or misleading) statements to Bank and the regulators during investigations can be a criminal act that can result in severe punishment.
- Knowingly withholding information that raises ethical questions and destroying evidence or records that are potentially relevant to a violation of law or any litigation or any pending, threatened or foreseeable government investigation is a punishable offence.

Code of Conduct and Ethics – Do's and Don'ts

An indicative list of do's and don'ts is enumerated below. All employees of the Bank shall:

Do's

- Comply with laws, regulations and the Bank's standards.
- Obey reasonable instructions of the superiors.
- Avoid moral turpitude and do nothing which is unbecoming of an employee of the Bank.
- Adhere to KYC/AML guidelines and Bank's standards to prohibit/prevent money laundering, terrorist financing and fraud perpetration.
- Be responsive to the stakeholders and demonstrate exemplary governance at all times.
- Reject bribery and corruption and must not give or accept bribes nor engage in any form of corruption.
- Be familiar with the Bank's guidelines on Prevention of Sexual Harassment and refrain from any behaviour, words or action that can be construed as Sexual Harassment.
- Avoid conflicts of interest.

Don'ts

- Do not offer, give or accept inappropriate gifts or benefits.
- Do not deal in Bank's shares in violation of Prevention of Insider Trading guidelines.
- Do not disclose customer or Bank data unless authorized to do so.
- Do not break into the network/computer system of another organization or person.
- Do not share passwords (Domain/CBS/HRMS/Email/ATM etc.)
- Do not refuse to cooperate with any investigation.
- Do not fight or threaten violence at the workplace.
- Do not spread rumours or unauthenticated information.
- Do not use foul language (including verbal) at the workplace.
- Do not be negligent or exhibit improper conduct leading to damage of Bank or Customer property.
- Do not participate in any demonstration against the Bank or its officials.
- Do not submit and claim false bills for reimbursements.
- Do not misuse Bank's vehicle for personal journey.
- Do not violate Bank's dress code.

Special Responsibilities of Superiors and Managers

Managers and supervisors have a critical role to play in the Bank. In addition to their responsibilities as employees, the supervisors and managers must play a major part in creating an environment that encourages ethical behaviour in the Bank. Some of these are:

- They must assist the employees to understand and apply the internal policies and procedures effectively for the betterment of all concerned;
- They must encourage employees to report any wrongdoing/ unethical practice as soon as they come to notice it, to avoid any doubts later that an offence was being committed with their knowledge, which could be construed as connivance by the employee;
- Ensure that compliance with provisions of applicable laws/regulations is monitored on an ongoing basis;
- They should effectively communicate to the employees that any violations of the applicable laws/ regulations are disapproved of and would have disciplinary implications and issue suitable directives in this respect.

Commitment to Regulators, stakeholders, and ensuring accurate records, reporting requirements

The Bank follows a policy of full cooperation with the regulators and is committed to compliance with all applicable regulations connected with its business.

All employees shall at all times be responsive and transparent to regulatory agencies and should ensure timely as well as accurate submission of information/reports.


Employees shall also cooperate and report (not withhold or misrepresent) any violation of regulation/ laws/ guidelines etc.

An employee found guilty of any violation in connection with submission of information/ reports to regulatory agencies will be liable for disciplinary action.


The Bank's relationship with other stake holders including customers, shareholders and suppliers are required to be cooperative, professional, ethical and impartial.

Negotiation with customers and vendors must be conducted in a fair and open manner to the satisfaction of all concerned. The Bank's vendors and suppliers should not be used for any personal purpose.

Stakeholders Commitment




The Bank shall endeavour to enhance shareholders' value, protect their interests and defend their rights by practicing pursuit of excellence in corporate life.




The Bank shall not only comply with all statutory requirements but also formulate and adhere to strong governance and business practices.




The Bank is committed to offering its customers the highest level of service and reliability. It values maintaining a strong relationship with its customers so as to identify areas for improvement in products and services using innovative approaches and technologies that would match and exceed customer expectations.




The Bank shall endeavour to develop employees by equipping them with the required job skills and provide employees with a safe, high-performing and respectful work environment.



The Bank is committed to maintaining integrity of financial reporting and disclosures required under all regulations and accordingly it shall communicate effectively with shareholders so that they are provided with full and accurate information, in all material respects, about the Bank's financial results and condition of operations.



Employees, who are responsible for preparing these reports, must assist in maintenance of appropriate records so as to ensure that financial transactions are prepared in accordance with generally accepted accounting principles and that they fairly present the financial conditions and results of the Bank.



The Bank shall ensure reports and documents that are required to be filed with or submitted to the government and regulatory authorities are, fair, timely and understandable and the employees responsible for submitting these reports must ensure completeness and accuracy.

4.2 Leadership Indicators: Process to avoid/manage conflict of interests involving members of the Board / Key Management Personnel

The bank has placed a comprehensive code of conduct for the Board of Directors and a code of conduct for the Senior Management Personnel, which is available on the Bank's website at the following link:

Home>Investor relation>Corporate Governance>Codes & Policies

The Code of conduct for the Board of Directors and the code of conduct for Senior Management Personnel are reproduced below for ready reference:

4.2.1 Code of Conduct for Board of Directors

The code of conduct for the Board of Directors of the Bank is laid down with an aim to ensure transparency and high ethical standards in managing the affairs of the Bank.

This code of conduct would be applicable to all the Board members of the Bank and would be observed by the members of the Board while carrying out the fiduciary duties conferred upon them by the statute.

Every Board member shall adhere to the Code of Conduct and the norms prescribed for monitoring and management of the conflict of interest. Every Board member shall:

Act in accordance with the highest standards of personal and professional integrity, honesty, with diligence and responsiveness, excellence in quality and ethical conduct.

Act in utmost good faith and fulfil the fiduciary obligations without allowing their independence of judgment to be compromised.

Not make any statement which has the effect of an adverse criticism of any policy or action of the Bank or which is capable of affecting the relations between the Bank and the general public/government/regulators and the stakeholders.

Neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to or perceived to obtain business or uncompetitive favours for the conduct of the business.

Do's

- Attend the Board Meetings regularly and effectively.
- Study the Board papers thoroughly and use the office of the Chief Executive for eliciting any information at the Board meeting.
- Be involved as Director on the Board thoroughly in the matter of formulation of general policy and ensure that performance of the Bank is monitored adequately at Board levels.
- Be familiar with the broad objective of the Bank and the policy laid down by the Government and the Reserve Bank of India.
- Contribute through constructive ideas for the better management of the Bank and thereby making valuable contribution to the Bank.
- Work as a team and not sponsor or be prejudiced against individual proposals. The management on its part is supposed to furnish full facts and complete papers in advance.
- Analyse and understand the trends of economy, assist in the discharge of management's responsibility to public and formulation of measures to improve customer service and be generally of constructive assistance to the Bank management.
- Ensure confidentiality of the Bank's agenda papers/notes.

Don'ts

- Do not send any instruction to any individual officer of the Bank or give direction to individual officer in any matter. Do not encourage the individual employee or unions approaching you in any matter.
- Do not involve yourself in any matter relating to personnel administration whether it is appointment, transfer, posting or a promotion or a redressal of individual grievances of any employee.
- Do not interfere in the day to day functioning of the Bank.
- Do not approach or influence for sanction of any kind of facility from an individual branch manager or any other officer.
- Do not sponsor any loan proposal, building and sites for Bank's premises, enlistment or empanelment of contractors, architects, doctors, lawyers etc.
- Do not participate in the Board discussion, if a proposal in which you are directly or indirectly interested comes up for discussion. Disclose your interest well in advance to the Chairman.
- Do not reveal any information relating to any constituent of the Bank to anyone as you are under oath of secrecy and fidelity.
- Do not directly call for papers/files/notes recorded by various departments for scrutiny etc. In respect of agenda items to be discussed in the meetings, all information/ clarification that they may require for taking a decision will be made available by the executive.

Conflict of Interest Norms

A conflict of interest exists when a person with fiduciary responsibility is in a situation where his own self-interest and the interests of the organization might be in conflict.

Conflict of Interest vis-a-vis the Board of Directors of the Bank may be defined as a transaction, relationship, or situation that presents or may present an existing or perceived conflict between a Board Member's obligations to the Bank and their personal, business or other interests.

The Board Members should adopt the following measures for monitoring and management of any situation of conflict of interest:

- ⇒ Make a full and complete disclosure of any actual/ potential conflicts of interest to the Bank on a periodic basis. New Members are required to disclose all actual or potential conflicts of interest before the commencement of their directorship.
- ⇒ Regularly update the Board of the directorship/membership/partnership/shareholding in closely held companies / substantial shareholding in a listed company or any other association with any institution/ company/ trust/ firm or any other entity.
- ⇒ Not all conflicts of interest are necessarily prohibited or harmful to the Bank. However, full disclosure of all actual and potential conflicts, a determination by the disinterested Board members, with the interested Board member(s) recusing themselves from participating in deliberations and voting on the matter is required.
- ⇒ If the Board of Directors of the Bank has reason to believe or has knowledge of any development that may give rise to a situation of conflict of interest vis-a-vis any Board Member, it may advise the concerned Board Member(s) to give a declaration in writing, clarifying the situation of conflict of interest, if any.
- ⇒ Non-disclosure of conflict of interest by any Board Member would be treated as misconduct if the same is conscious and deliberate (not inadvertent) and the Board of Directors may decide on an appropriate penal action for the same.
- ⇒ The Board of Directors of the Bank may post facto ratify an inadvertent non-disclosure of the conflict of interest by any Board Member. The fact of any such ratification and the reason for non-disclosure would be duly noted.
- ⇒ If a conflict of interest is significant, ongoing and irreconcilable and if it impedes the ability of a Board Member to carry out the assigned roles and responsibilities, the Board may recommend reassigning of the allocated function.
- ⇒ Maintain the confidentiality of information obtained by virtue of their directorship in the Bank and would not allow the use of such information for direct or indirect commercial gains.

Roles and Duties of Independent Directors

Roles and Duties of Independent Directors shall be as mentioned in the Companies Act,

2013, Listing Regulations and the Banking Regulation Act, 1949.

4.3 Code of Conduct for Senior Management

Preamble

This Code of Conduct and Ethics is a statement of the Bank's commitment to integrity and the highest standards of ethical practices.

It defines the standards of conduct that are expected of senior management in order to ensure that the right decisions are taken in performing roles and responsibilities across various functions in the Bank.

The Code is intended to be the charter for day-to-day work to enable senior management to make the right decisions and, therefore, serves to:

2. underline the fundamental commitment to compliance with regulatory guidelines and laws of the land;
3. set forth basic parameters of ethical behaviour; and
4. establish a system for the detection and reporting of known or suspected ethical or violations of the regulation.

The Bank's core values have been articulated as cost-effective and simple, respect for all, exemplary governance, accountability, professionalism and discipline, transparency and integrity and effective teamwork and commitment. These define the manner in which the Bank deal with various stakeholders as outlined below.

- B. **Customers:** Apart from ensuring providing of banking services to the customers in a simple and reliable manner, our core values are anchored around our business ethics, customer centricity and responsibility towards society at large. In other words, it must be the endeavour of all employees in the Bank to always act in the best interest of the customers and society. This would translate into acting in a completely transparent manner with customers, providing them with the right advices/ information about products and services as well as rendering assistance in case of need.
- C. **Employees:** Employees are the most valuable resources of the Bank and in order to ensure that they will always do what is right for the customer, it is important that they are equipped with adequate job skills. The Bank endeavours to ensure that

knowledge of compliance, regulatory and legal aspects relating to banking services are provided to employees.

Another aspect of this Code relates to public conduct, interactions with external entities including the media and dealings with colleagues. From the standpoint of creating a culture of cooperation and cohesion, it is also important for all to instil in the employees a sense of pride and the essence of teamwork.

- D. **Shareholders:** Shareholders are one of the most important constituents and it is the responsibility of all to provide them with regular disclosure and information about the Bank that is accurate, transparent and intended to be in the public domain.
- E. **Regulators:** Compliance with regulation constitutes one of the main attributes of the Code of Conduct and Ethics. It is the Bank's endeavour, as has been stated above, to ensure that employees of the Bank have knowledge of compliance requirements, setting up exemplary governance and that they are vigilant in preventing breaches in this regard.

The Code shall be posted on the website of the Bank. Several of the policies (HR Policy, Anti-Money Laundering Policy, Sexual Harassment Policy, and Whistleblower Policy) are comprehensively detailed in separate Policy documents, which have been approved by the Committees of the Board or by the Board of the Bank.

5 POLICIES ON PRINCIPLE 2 - BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

5.1 Essential Indicator - Sustainable sourcing

Philosophy

The Bank endeavours to integrate sustainability in the supply chain(s) for its products and services across its business portfolio.

The Bank's supply chain includes outsourced agencies, third-party service providers, transporters, suppliers of materials and capital goods, franchisees, dealers and distributors.

The Bank recognizes the need to work closely with our suppliers to reduce waste, improve efficiency and reduce carbon footprint and thus will continue to work towards greater integration of environmental factors in our procurement practices.

It is the policy of the bank:

- To continuously raise awareness of supply chain members to comply with applicable laws and regulations related to labour and employment, including gender diversity, human rights, child labour, wages, working hours, bribery & corruption, occupational health, safety and environment;
- To disengage business relationships with supply chain members in the event of a serious or consistent lack of commitment to corrective action;
- To work with supply chain members who adopt and accept the Bank's Code of Conduct for Suppliers and Service Providers;
- To assess the sustainability risks of supply chain members and assist them to build resilience against such risks;
- To encourage resource-use efficiency, including sustainable natural resource management, greenhouse gas reduction and sustainable waste management, wherever practicable, through a set of key performance indicators in the supply chain;
- To collaborate with customers of the Bank to make them more sustainable and help build their adaptive capacity and resilience to emerging risks like climate change and water stress and other extreme environmental events;

Procurement

The Bank shall attempt to procure its inputs in terms of value or volume are sourced from suppliers covered under the sustainable sourcing programme including the following:

- Recycled
- Environment friendly
- Energy efficient
- Locally sourced
- Certified to be compliant with social and environmental standards such as SA 8000, ISO 14001, OHSAS 18001 or relevant labels like Rainforest Alliance, Rugmark, RSPO etc.

Governance

- The accountability for the sustainability and environment policy will lie with the Board of Directors and the CSR Committee of the Board.
- The Bank shall put appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, as applicable, including the processing of grievances for redressal. It shall be the responsibility of the Senior Management Personnel, through members of the respective Management Committees, and Corporate Heads of Departments to ensure progressive implementation of the Policy and its communication to the employees.
- Compliance with the Policy will be regularly monitored and evaluated by the Sustainability Compliance Review Committee (SCRC) of the Senior Management Personnel.
- The CSR Committee of the Board will be apprised annually on the implementation of the Policy.

6 POLICIES ON PRINCIPLE 3 - BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS

6.1 Essential Indicator – Measures for the well-being of employees

The Bank takes pride in its employees and strives for their well-being. The HR Policy of the bank covers in detail various such measures and are available to the employees through the HRMS portal of the Bank.

6.1.1 Policy on Performance management, Promotions and Training

The Policy on performance management is provided in the HR Policy of the Bank and is available in the HRMS portal of the Bank to all employees.

6.1.2 Policy on Workplace Health and Safety

Philosophy

The Bank is committed to conducting its operations with due regard for the environment and to providing a safe and healthy workplace for its employees

The good health and safety of employees are of great importance to the Bank. While the Bank has put in place internal systems and procedures for the creation and maintenance of a safe and healthy environment at the workplace, employees are required to follow safety guidelines and internal processes.

The Bank employees are also encouraged to ensure, through proper behaviour, an accident-free workplace. They should make themselves aware of accident prevention and safe usage steps and make a useful contribution in keeping the workplace safe from accidents and other hazards.

Policy

It is Bank's Policy

- To provide safe and healthy working conditions for the prevention of work-related injury and ill-health through the process of risk identification and systematic assessment with the active participation of the workforce,
- To encourage a culture of safety by providing appropriate training to employees as well as service providers' employees on EHS, investing in state-of-the-art technology and developing human capital
- To instil a sense of duty in every employee, including those of service providers at the Bank's premises, towards their personal safety, as well as that of their co-workers;
- To contribute to sustainable development through the establishment and implementation of environment, health and safety (EHS) standards that meet the requirements of relevant laws, regulations and codes of practice, and endeavour to create the safest workplace environment;

- To take into account environment and occupational health & safety aspects in planning and decision-making;
- To enhance EHS performance by setting objectives and targets and continually monitoring key performance indicators;
- To enhance the accessibility of the workplaces to the employees, customers and other stakeholders such as wheelchairs ramps, braille, signage, accessible restrooms, and digital accessibility, where information and communication technology is accessible to all and/or compatible with assistive technology devices

The employees shall:

- take reasonable proactive measures for the prevention of workplace accidents and injuries;
- be alert to suspicious movements of individuals within the Bank's premises and report any unusual activity thereof;
- refrain from possessing, distributing or use of drugs, firearms or any other items that could adversely affect health, safety and security at the workplace.

Implementation

- This policy is communicated to all employees in an appropriate and meaningful manner.
- The Bank Branches and offices shall have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including the processing of grievances for redressal.
- The Senior Management Personnel, through members of the respective Management Committees, will ensure the implementation of this Policy. The Sustainability Compliance Review Committee (SCRC) will regularly monitor and evaluate Compliance with the Policy.
- The CSR Committee of the Board will supervise the implementation of this Policy.

6.2 Leadership Indicators – Rehabilitation and suitable employment of employees

‘Rehabilitation’ refers to a process aimed at enabling persons with disabilities to attain and

maintain optimal, physical, sensory, intellectual, psychological environmental or social function levels.

The Bank at its discretion may rehabilitate its employees with suitable employment.

7 POLICIES ON PRINCIPLE 4 - BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL THEIR STAKEHOLDERS

7.1 Essential Indicators – Key Stakeholder Identification

Through the means of various stakeholders' engaged processes, the Bank will continue to empower and encourage various stakeholders including employees, customers, suppliers, vendors, shareholders and other stakeholders to bring to the notice of the Bank, any issues related to the Bank.

The Bank is committed to maintaining the highest levels of ethical standards of integrity, corporate governance and regulatory compliance. These parameters form the bedrock of our corporate governance policy. The Bank has proactively upheld good governance practices and is constantly striving to enhance our standards. The Board of Directors is responsible for setting the course for and evaluating the bank's performance concerning corporate governance. The parameters of evaluation include compliance, internal control, risk management, information and cyber security, customer service, social & environmental responsibility.

The Bank's corporate governance framework complies with the Indian Companies Act, the regulations and guidelines of the Securities and Exchange Board of India ("SEBI") and the requirements of the listing agreements entered into, with the Indian stock exchanges

Philosophy

The bank believes that an effective stakeholder engagement process is necessary for achieving its sustainability goal of inclusive growth. The Bank accordingly anchors its stakeholder engagement on the principles of the following features:

- **Materiality** - taking prioritised consideration of the economic, environmental and social impacts identified to be important to the organisation as well as its stakeholders.
- **Completeness** - understanding the stakeholders' key concerns and expectations.
- **Responsiveness** - responding coherently and speedily to such issues and concerns.

Policy

It is Bank's policy:

- To identify and engage with all its stakeholders consistently and systematically;
- To understand the concerns of stakeholders including those who are disadvantaged, vulnerable and marginalised and prioritise their concerns;
- To work towards addressing these concerns equitably and transparently.

Implementation

- This policy is communicated to all employees in an appropriate and meaningful manner.
- The Bank Branches and offices shall have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including the processing of grievances for redressal.
- The Senior Management Personnel, through members of the respective Management Committees, will ensure the implementation of this Policy. The Sustainability Compliance Review Committee (SCRC) will regularly monitor and evaluate Compliance with the Policy (SCRC).
- The CSR Committee of the Board will supervise the implementation of this Policy.

7.2 Leadership Indicators – Stakeholder engagement

The Bank has an appropriate mechanism to engage with its stakeholders, especially marginal and weaker sections the society and it is covered in the CSR policy of the Bank.

8 POLICIES ON PRINCIPLE 5 - BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

8.1 Essential Indicators – Non- Discrimination and Fair Treatment

8.1.1 Policy on Diversity and equal opportunity

Philosophy

The Bank believes that diversity and inclusiveness in the workspace create an environment conducive to engagement, alignment, innovation and high performance. This is achieved by a policy that ensures diversity and non-discrimination across the Bank.

Policy

It is Bank's policy:

- To promote diversity and offer equal opportunity to all employees based on merit and ability;
- To hire and promote employees based on qualification, performance and ability;
- To provide a work environment that is free from any form of discrimination, including but not limited to sexual harassment;
- To ensure that there is no discrimination amongst its employees in compensation, training and employee benefits, based on caste, religion, disability, gender, sexual orientation, race, colour, ancestry, marital status or affiliation with a political, religious or union organisation or majority/minority group.
- To ensure that the remuneration and benefits are equal to or more than the minimum wages and that the benefits provided to the employees adhere to the statutory provision of the various laws and policies of the country.

Implementation

- This policy is communicated to all employees in an appropriate and meaningful manner.
- The Bank Branches and offices shall have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including the processing of grievances for redressal.

- The Senior Management Personnel, through members of the respective Management Committees, will ensure the implementation of this Policy. The Sustainability Compliance Review Committee (SCRC) will regularly monitor and evaluate Compliance with the Policy.
- The CSR Committee of the Board will supervise the implementation of this Policy.

8.1.2 Policy on Harassment and Grievance Redressal

The HR policy of the Bank incorporates the Policy on Sexual Harassment and Grievance redressal and is available in the HRMS portal of the Bank.

A relevant section from the HR policy is reproduced below for ready reference.

- The Bank is an equal-opportunity employer. It will not discriminate based on religion, race, caste, sex, place of birth, descent, sexual orientation, gender identity, disability, age or any other basis as prohibited by law.
- The Bank will not condone any discrimination against any person on its premises, whether that person is in its employment or otherwise.
- The Bank is committed to fostering a workplace free of harassment and intimidation, where all employees can work together with openness, trust and respect for each other.
- Employees are expected to conduct themselves following the high ethical standards of honesty and integrity and treat each other with courtesy and respect. They should at all times avoid behaviour at the workplace that may create an atmosphere of hostility or intimidation.

Harassment

As described above, harassment is any unwelcome verbal, nonverbal or physical behaviour that unreasonably interferes with work or creates an intimidating, hostile or offensive work environment. It can:

- include comments (oral, written including those made through all types of electronic media), gestures, or physical actions;
- be a single incident or a repeated, continuous pattern of behaviour;
- demean, belittle or cause personal humiliation or embarrassment;
- be directed at a particular person or a number of people;
- be initiated by a colleague, a supervisor or someone outside the organization;

Other behaviours that might constitute harassment include:

1. public or private tirades by a colleague other than the supervisor;
2. public or private tirades by a supervisor except in case of dereliction of duties;
3. severe or repeated insults related to a person's personal or professional competence;
4. deliberate desecration of religious and/ or national symbols;
5. racial epithets, slurs, and malicious, negative stereotyping expressed toward an individual or a group directly or indirectly (e.g., circulated via e-mail, written on walls);
6. malicious and false complaints of misconduct against other employees.
7. A series of events that have a long-term effect on an employee's emotional stability.

Conflict Resolution

An employee who feels that he or she is being subjected to harassment should first, where possible, make his / her disapproval clearly known to the individual(s) concerned and ask that the behaviour be stopped. If there is no apparent change in the behaviour of the perpetrator, the employee concerned can make use of either an informal or formal resolution process for redressing their complaint.

Freedom from Retaliation

A person who in good faith brings a complaint of harassment against another person shall not be subjected to any form of retaliation. The Bank prohibits retaliation against anyone who files a complaint in good faith, and retaliation in itself constitutes misconduct subject to disciplinary action. Discriminating against an employee who has made a complaint of harassment or deleteriously affecting the terms and conditions of employment or work environment of the employee will be construed as retaliation.

Confidentiality

All employees who are aware of a harassment complaint, or involved in its resolution, must recognize the seriousness of the situation and respect the sensitivity and confidentiality that must be accorded to the matter. The employees must refrain from discussing the complaint amongst themselves or with anyone who does not have a "need to know." Every effort will be made to preserve the dignity and self-respect of the parties to the complaint.

Action against false complaints

False or malicious complaints can seriously damage a person's reputation, career, and relationships. If anyone makes a false or malicious complaint of harassment and it is so established after a thorough and proper investigation, the complainant will face disciplinary action, depending on the situation.

8.1.3 Prevention of Sexual Harassment

The Bank is committed to creating and maintaining a secure work environment where its employees, agents, vendors and partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within, but not limited to, the office premises and other locations directly related to the Bank's business.

The Bank protects against sexual harassment irrespective of gender at the workplace. These guidelines aim to prevent/prohibit, redress any incident of sexual harassment and provide for strong disciplinary action in face of any such occurrence.

Scope & Coverage

The Bank aims to cover prevention, prohibition and redressal of Sexual Harassment which may arise in places not limited to the Bank's offices/branches but also includes all such places or locations where such acts are conducted in the context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the Bank, if any, for undertaking such visit.

The guidelines apply to sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsourced employees.

Sexual harassment is judged by the impact on the complainant and not the intent of the respondent. Sexual harassment as addressed in these guidelines need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of the same gender.

Definitions

"Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) such as:

1. Physical contact and advances;
2. A demand or request for sexual favours;
3. Making sexually coloured remarks;
4. Showing pornography; or
5. Any other unwelcome physical, verbal, non-verbal, textual, or electronic behaviour of sexual nature.

In addition to the above definition, if there are the following circumstances along with or apart from, it shall amount to sexual harassment (creation of a Hostile Work Environment).

1. implied or explicit promise of preferential treatment in their employment;
2. implied or explicit threat of detrimental treatment in their employment;
3. implied or explicit threat about their present or future employment status;
4. interfering with their work or creating an intimidating, offensive or hostile work environment;
5. humiliating treatment likely to affect the health and safety of the aggrieved person.

Redressal Mechanism

An Internal Committee (IC) consisting of one Presiding Officer and three members is constituted at the head office to enquire into and provide redressal of Sexual Harassment complaints.

Any aggrieved person may make, in writing, a complaint of sexual harassment at the workplace to the committee, within a period of 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident along with the supporting documents, names & addresses of witnesses to IC at The Presiding Officer, Internal Complaints Committee, Bandhan Bank Ltd., DN-32, Sector V, Salt Lake City, Kolkata 700091. However, the time limit may be extended for a further period of 3 months, if in the opinion of the IC there were circumstances, which prevented the aggrieved person from filing the complaint earlier.

Upon receipt of such complaint, the IC shall determine whether the complaint thus received falls under the purview/definition of Sexual Harassment, preferably within 7 days from receipt, and it would record their findings with reasons and communicate the same to the complainant and the HR Department if the complaint does not fall under the purview of Sexual

Harassment.

However, if the IC is of the view that the complaint is indeed a case of Sexual Harassment then it will provide a copy of the complaint along with supporting documents of such complaints to the Respondent, against whom the complaint is lodged, within 7 working days. The Respondent shall submit a reply to the IC within 10 working days of receipt of the complaint along with the list of documents, names and addresses of witnesses, if any, in support of his / her submission.

Anonymous Complaints

While making a complaint it is desired and expected that the complainant mentions details about himself/herself, which will be dealt with in strict confidentiality. In the event of receipt of an anonymous complaint, it becomes difficult to ascertain the veracity of the complaint, investigate and draw conclusions about it. Hence, depending on the evidence provided of the alleged harassment, the IC may make reasonable attempts to investigate and address the anonymous complaint received by it.

Investigation/Inquiry into the Complaint

The IC shall have the right to summon the respondent or any other witnesses as and when necessary. IC shall have the right to terminate inquiry proceedings or issue an ex-parte decision in the complaint if the aggrieved person and/or respondent without sufficient cause fails to present themselves before the ICIC.

The IC is free to obtain/summon/enforce through the HR department and/or from the concerned department such information in the form of written communication, witnesses, previous records, and data of the concerned/relevant employees which may be helpful for the investigation.

All proceedings of the IC will be recorded in writing. IC and individuals shall endorse their respective statements as a token of authenticity. In case of refusal to endorse the same by either party, the presiding officer with appropriate remarks shall make the endorsement.

On completion of an inquiry, the IC to the Bank would submit a report within 10 days. The report will contain the outline of the case, investigation process, conclusion based on the balance of probabilities, findings based thereof and recommendations for further action.

The IC shall share a copy of the findings of the inquiry with the aggrieved person and the respondent.

Action

If the allegation against the respondent has not been proven, the Committee may recommend that no action needs to be taken in the matter. If the IC concludes that the allegation against the respondent has been proven, it shall recommend to:

- Initiate action against the respondent as recommended in their report in accordance with the extant Code of Conduct and Ethics of the Bank;
- If the respondent is not an employee of the Bank, in addition to assisting the complainant to initiate action against the person as per the law, the Bank will debar the offender from the Bank's premises;
- The Bank shall act upon the final recommendations of the IC within 60 days of its receipt.

False and Malicious Complaints

In case it has been proved that the complaint has been made with a malaise intention, the IC will recommend suitable action to the HR against the complainant and against the witnesses for appropriate disciplinary action, to prevent the recurrence of such complaints.

Confidentiality

The contents of the complaint made under the provisions of these guidelines, identity and addresses of the aggrieved person, respondent and witnesses, information related enquiry proceedings, recommendations by the IC, and action taken by the Bank shall not be published, communicated or informed to public or media in any manner.

8.1.4 Employee Accountability

The Bank shall pursue employee accountability in cases of gross negligence, blatant violations of systems and procedures, the reckless performance of duties or when malaises are apparent.

Disciplinary setup and procedures

The Bank has formulated a standard disciplinary procedure, which applies to all employees and which is fair to the employee concerned.

Disciplinary action will start based on the report received by the Team from the respective business group, who would submit their report after following the aforementioned process.

In case of any breach of the Code of Conduct and Ethics and based on the veracity of the

allegations, a suo-moto inquiry/investigation may be initiated by the Discipline & Ethics Management Team through the Vigilance or Inspection & Audit Department.

Based on the investigation report, the Discipline & Ethics Management Team will put up the case to the Disciplinary Committee for further direction/decision in the matter.

8.1.5 Policy on Prohibition of Child Labour and Prevention of Forced Labour at Workplace

Philosophy

The bank believes in a "No Child Labour and No Forced Labour" policy.

Policy

It is Bank's policy:

- To ensure that no person below the age of eighteen years is employed in the workplace;
- To prohibit the use of forced or compulsory labour at all its Units;
- To ensure that no employee is made to work against his / her will or to work as bonded/forced labour, or subjected to corporal punishment or coercion of any kind, related to work;
- To refrain from engaging with vendors and suppliers who resort to using child labour and forced labour in their operations.

Implementation

- This policy is communicated to all employees in an appropriate and meaningful manner.
- The Bank Branches and offices shall have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including the processing of grievances for redressal.
- The Senior Management Personnel, through members of the respective Management Committees, will ensure the implementation of this Policy. The Sustainability Compliance Review Committee (SCRC) will regularly monitor and evaluate Compliance with the Policy.
- The CSR Committee of the Board will supervise the implementation of this Policy.

9 POLICIES ON PRINCIPLE 6 - BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

9.1 Essential Indicators – Renewable energy and emission management

9.1.1 Policy on Energy and Emissions Management

The Bank will continue its efforts in reducing greenhouse gas (GHG) emissions each year. The Bank will take on initiatives to monitor and reduce its energy consumption. These initiatives will be aimed at –

- Measuring and reporting energy consumption and emissions
- Promoting products and services that result in less energy consumption and emissions
- Adopting energy-efficient operating procedures for facility management and travel

The Bank will strive to reduce its combined emissions Intensity by adopting best energy management practices.

9.1.2 Policy on Water and Waste Management

Water Management

At the Bank's offices and branches, water is largely used for employee consumption and domestic purposes. To further reduce levels of consumption, the Bank will promote best practices and involve employees in water-saving initiatives.

Waste Management

The Bank shall make efforts to dispose of waste responsibly. Major sources of waste produced by the Bank are IT waste and paper waste, which shall be handed over to authorized recyclers. The Bank will ensure that no hazardous IT waste is sent from the Bank to the landfill.

Awareness and Employee Engagement

The Bank understands that its employees and customers can play a major role in reducing the Bank's environmental impact. The Bank will engage employees and encourage them to adopt

environment-friendly practices. The Bank shall also endeavour to create awareness among employees and customers regarding various initiatives, products and services of the Bank, which have a positive environmental impact

The Bank shall disclose the waste recycling efforts undertaken by the bank and the volume or value of waste recycled.

Policy Review

This policy shall be reviewed annually to incorporate changes and further improvements.

9.1 Leadership Indicator – Environment Risk assessment

Environment Risk Assessment for Credit and Investments

Risk Assessment / Screening

- For all loans, whether for Greenfield projects or regular capital expenditure, that have a value of more than INR 10 Crore and are for more than 5 years, the Credit Appraisal Memorandum (CAM) shall include a Social & Environment Management System (SEMS) annexure. The SEMS annexure shall highlight the environmental & social risks, which are likely to impact/affect the project/operations of the Company.
- The annexure shall be prepared by the Relationship Manager (RM) as a part of the CAM, basis representations from the Client and/or technical due diligence of specific projects conducted by the Lenders' Independent Engineer (LIE) that may have been appointed by the Bank.
- Where a LIE is appointed, the assessment of the environment and social risks shall be a part of the scope of work of the LIE. Where a LIE is not appointed, the RM shall obtain the necessary undertakings from the client certifying compliance with environmental norms in force.
- Clients / Borrowers will be required, if necessary to prepare an Environmental management plan for the formulation, implementation and monitoring of environmental protection measures during and after the commissioning of projects, based on the inputs provided by the LIE. The plans would indicate the details as to how various measures for environmental protection have been or are proposed to be taken to mitigate the risks arising from these
- The LIE would visit the project site on regular basis during implementation and report exhaustive and detailed progress of the project, which would include an ongoing assessment

of environmental risks, the status of various approvals and Relocation & Rehabilitation if involved. A quarterly report highlighting any specific issues shall be provided. The Bank will also conduct a regular site inspection to ascertain the project progress and flag off any environment-related issues for immediate redressal.

- The Following factors will continue to be reviewed by the Bank before taking any Credit call on long-term loans:
 - **Social Consideration:** Employment generation, Role in the economic development of the region, compliance with labour laws, no exploitative / child / forced labour
 - **Resettlement & Rehabilitation:** Number of families under rehabilitation, impact on livelihood, Facilities provided to families and their acceptability in the community, Number of villages/population affected by the project
 - **CSR Initiatives:** Schools, hospitals, medical facilities, technical institutes, roads, community buildings etc. provided by the company.
 - **Emissions:** Air, water, noise, waste and comments on its acceptability
 - **Environmental Consideration:** Air pollution / Water Pollution / Hazardous Waste Management / Ecological influence, Emergency and Disaster management.
- In addition, the Bank as a part of its credit policy will not extend finance for:
 - a. Setting up of new units which produce/consume ozone-depleting substances (CFC -11, CFC- 12, CFC – 113, Carbon Tetrachloride, Methyl Chloroform, Halons – 1211, 1301, 2402)
 - b. Small & Medium scale units engaged in the manufacture of aerosol units using CFC

10 POLICIES ON PRINCIPLE 7 - BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

10.1 Leadership Indicators – Public Policy Advocacy position

10.1.1 Policy on Public Advocacy

Philosophy

The Bank firmly believes in adhering to the various policies of the regulatory authority at the highest standards and that the policies should promote fair competition and respect for human rights.

Policy

It is Bank's Policy

- To ensure that the governance and the principles of the various regulations are adhered to while undertaking such public policy advocacy.
- To ensure that any public policy advocacy (if required) are undertaken through recognised trade and industry chambers and associations, and other similar collective platforms.
- To ensure that such public policy advocacy promotes fair competition and respect for human rights.

Implementation

- This policy is communicated to all employees in an appropriate and meaningful manner.
- The Bank Branches and offices shall have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including the processing of grievances for redressal.
- The Senior Management Personnel, through members of the respective Management Committees, will ensure the implementation of this Policy. The Sustainability Compliance Review Committee (SCRC) will regularly monitor and evaluate Compliance with the Policy (SCRC).
- The CSR Committee of the Board will supervise the implementation of this Policy.

11 POLICIES ON PRINCIPLE 8 – BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

11.1 Essential Indicators – Inclusive Growth and equitable development

11.1.1 Policy on Inclusive growth and equitable development

Philosophy

The Bank firmly believes and strives for inclusive growth and equitable development and it is imbibed in its banking philosophy of '*apka bhala sabki bhalai*'.

Policy

It is Bank's policy

- To ensure that the bank measures the impacts takes appropriate actions to minimize any adverse impacts that it has on social, cultural and economic aspects of society arising from its operations.
- To ensure that the Bank innovate and invest in products, technologies and processes that promote the well-being of all segments of society, including vulnerable and marginalized groups.
- To ensure that the Bank responds to the national and local development priorities and understand the needs and concerns of local communities, particularly vulnerable and marginalised groups and in regions that are underdeveloped while designing and implementing their CSR programmes.
- To ensure that the Bank respects all forms of intellectual property and traditional knowledge and make efforts to ensure that benefits derived from their knowledge are shared equitably

Implementation

- This policy is communicated to all employees in an appropriate and meaningful manner.
- The Bank Branches and offices shall have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including the processing of grievances for redressal.
- The Senior Management Personnel, through members of the respective Management Committees, will ensure the implementation of this Policy. The

Sustainability Compliance Review Committee (SCRC) will regularly monitor and evaluate Compliance with the Policy.

- The CSR Committee of the Board will supervise the implementation of this Policy.

11.2 Leadership Indicators – Corporate Social Responsibility

The Bank engages with local communities to promote social development initiatives as per the CSR Policy of the bank.

11.2.1 Policy on Corporate Social Responsibility

The Policy on engagement with the local communities for CSR purposes is available at the Bank's website at the following link:

1. CSR Policy –
https://bandhanbank.com/pdfViewerJS/index.html#../sites/default/files/2021-07/CSR-Policy-2021_1.pdf

12 POLICIES ON PRINCIPLE 9 – BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

12.1 Leadership Indicator – Customer information

Philosophy

The Bank is highly committed to providing its utmost attention to the customers and providing them with superior services and allowing consumers to have the freedom of choice in the selection and usage of banking services.

The Bank recognises that maintaining the trust and regard of our customers is important for our success and longevity, in a fiercely competitive market. Through our digital platforms and initiatives, we will provide customers, the flexibility to access and consume our banking services over any digital platform of their choice. We recognize that product quality and service delivery is vital for our business growth. The Bank seeks to achieve this by regularly reviewing service levels and capturing feedback from customers.

Abiding by its Customer Privacy policy, the Bank will continue to treat customers' data with utmost sensitivity and privacy. The Bank will also undertake initiatives to combat cybercrime and data theft using a comprehensive mechanism of information and data security.

Policy

It is Bank's Policy

- To ensure that the products and services of the Bank are safe and create value for both customers and the Bank.
- To ensure that the Bank provides necessary information related to its products and services, including its risks and benefits through appropriate disclosures and other means to the customers so that they have freedom of choice in the selection and availing of the products and services of the bank.
- To ensure that the customer data are managed in a way that does not infringe upon their right to privacy.
- To ensure that the promotion and advertisement related to the product and services are in a way that does not mislead or confuse the consumers or violate any regulatory provisions.
- To ensure that the Bank provides appropriate grievance redressal mechanisms that are transparent and accessible, to address consumer concerns and feedback
- To ensure that the Bank provides essential services, e.g. Utilities, toilets etc. should enable universal access to the customers in its premises in a non-discriminatory and responsible manner.

Implementation

- This policy is communicated to all employees in an appropriate and meaningful manner.
- The Bank Branches and offices shall have appropriate systems and processes in place to ensure compliance with the Policy and with statutory provisions, including the processing of grievances for redressal.
- The Senior Management Personnel, through members of the respective Management Committees, will ensure the implementation of this Policy. The Sustainability Compliance Review Committee (SCRC) will regularly monitor and evaluate Compliance with the Policy.
- The CSR Committee of the Board will supervise the implementation of this Policy.