Our **Ethical Conduct**

understand that our business depends on the trust of our customers and partners and we are committed to always conducting our business in a responsible, ethical and lawful manner. This is why we have adopted a Code of Conduct that lays high standards of integrity on how we do business. The Code further sets clear expectations and requirements for each and every one of us, regardless of our designation, role or location. We are expected to act as guardians of Grameenphone's integrity and to follow the 4 key principles that define the basis of our business conduct.

Our Principles



We play by the rules

We follow laws, regulations and our policies and, if in conflict, we uphold the highest standard



We are accountable for our actions

We actively seek information, understand our responsibilities, and recognise our wider impact on the societies in which we operate



We are transparent and honest

We are open and truthful about our challenges



We speak up

We ask questions when in doubt and raise concerns without concern of retaliation

Vey achievements in 2020

 In 2020, Grameenphone adopted an updated Code of Conduct. In addition, 100% of Grameenphone employees completed a mandatory Code of Conduct e-learning and electronically signed off on their commitment to always comply with Grameenphone's Code of Conduct.



- 2. With a high focus on training and awareness activities, the Ethics and Compliance team organised a Company-wide celebration of International Anti-Corruption Day and observed Anti-Sexual Harassment week to increase awareness among Grameenphone employees. In addition to the successful launch of our new Anti-corruption e-learning, the Ethics & Compliance team conducted more than 20 virtual, live training sessions and workshops for Grameenphone employees and partners.
- 3. Conducted its annual Integrity Risk Assessment and implemented an integrity risk mitigation plan to lessen the likelihood and impact of identified risks. The Integrity Risk Assessment and Mitigation plan is reviewed and followed up quarterly to ensure effectiveness.
- 4. In line with our Code of Conduct, Grameenphone employees submitted Conflict of Interest declarations. Service to Grameenphone can never be subordinated to an individual's personal gain or advantage. Any decision on behalf of Grameenphone shall be based on an objective and fair assessment of Grameenphone's interest, our Code of Conduct and our Values.