

# Our Ethical Conduct

We understand that our business depends on the trust of our customers and partners and we are committed to conducting our business in a responsible, ethical and lawful manner, always. 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 4 key principles that define the basis of our business conduct.



### 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

## Key achievements in 2019

1. Adoption of Business Partner Compliance Management Policy – designed to ensure that Grameenphone's relationships with Business Partners do not pose unacceptable compliance risks to Grameenphone, including but not limited to corruption, fraud, money laundering, trade sanctions and also risks related to privacy, business security, health and safety, human rights, and the environment.
2. Adoption of Anti-Sexual Harassment Manual – designed to reflect Grameenphone's ethical standards and legal obligations for preventing and tackling sexual harassment. The Manual proclaims Grameenphone's zero tolerance with any form of sexual harassment.
3. Awareness– All Grameenphone employees completed a mandatory Code of Conduct e-learning and electronically re-signed Grameenphone's Code of Conduct. In addition, the Ethics and Compliance team conducted 41 training sessions, covering over 2,000 employees.
4. Improved Integrity Index –the Integrity Index of Grameenphone marked a spike from 76 in 2018 to 86 in 2019. This is an indication of continuous strengthening of ethical culture in the organisation and increased trust in the compliance function.

