

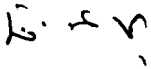
## SUSTAINABILITY REPORT

**RAISING THE BAR**

In this part of the Report the Bank examines the impact our activities have had on the economy, the environment and society in general.

Today the goal of any corporate entity is not just to deliver consistent financial value to its investors, but to ensure that its activities generate a broader social wealth that can be distributed among a wider group of stakeholders, including our investors. This is one of the goals of modern corporate citizenship: to ensure that diverse social groups are empowered; to unleash new opportunities; to invest in both Company and society; and to fan new and creative ideas.

We hope the publication of the Sustainability Report will enhance transparency with regard to all aspects of our operations and strengthen public confidence in the institution. We hope it will enable us to push the bar higher and continue to deliver financial, social and environmental value consistently and ethically.



**Eastman Narangoda**

*Executive Chairman*

## **SUSTAINABLE DEVELOPMENT AIMS TO MEET THE NEEDS OF THE PRESENT WITHOUT COMPROMISING ON THE ABILITY OF FUTURE GENERATIONS TO MEET THEIR OWN NEEDS**

Seylan Bank, as a major player in the financial industry in Sri Lanka, is committed to a vision of sustainable development. The Bank's processes and systems are geared to ensuring that the Bank promotes sustainable development in the way it designs products, delivers financial services, organises the workplace and engages with society.

In this report we document the impact of the Bank's activities on the economy, the environment, and society in general. It also documents how the Bank has been generating a larger social wealth for all our stakeholders. The Company's stakeholders are many. They consist of our customers; our employees and their families; our shareholders; our business partners; the larger society; and generations yet unborn.

While building financial wealth for our shareholders is one of the things we do, we are also conscious that our activities have an impact on the physical environment, the economy, and society in general. While generating financial value we continue to work to protecting the environment, fuelling the economy, empowering communities and creating new opportunities for our employees.

The Bank hopes that this Sustainability Report will provide information on all aspects of our operations: the tangible and the intangible. We hope this process will enhance transparency, facilitate better communication with our stakeholders and increase stakeholder confidence in our operations.

Creating a more enduring social wealth has required the Bank to constantly re-design its strategy, mindset and internal processes. The Bank is constantly re-evaluating its methods of work and looking at how we can strengthen our performance on all fronts: the financial; the social and the environmental.

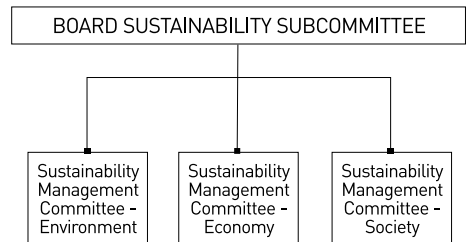
Reporting on an institution's economic, environmental and social performance supports the Bank's financial reporting. Candid sustainability reporting also enables the Bank to review our systems scrupulously and to improve on the processes we have already established.

While generating a broader social wealth the Bank has not compromised on the quality of its products and services; on business ethics and

transparency; on serving all social segments; and on creating safe and enjoyable workplaces.

In 2009, the Bank established a Sustainability Committee. The Committee will enable the Bank to engage in CSR activities in a coherent and structured manner. Within the larger CSR are three thematic subcommittees that look at the relevance and feasibility of Sustainability projects with regard to society; the economy; and the environment. The Bank also has a Sustainability Committee at board level and all these Committees are responsible for guiding the CSR activities of the Bank.

The Global Reporting Initiative (GRI) has developed a framework for sustainability reporting. The framework was developed through a process of extensive consultation with a wide variety of stakeholders. We have used the GRI framework as a model for this year's Report.



### **The Board**

The board of directors establishes overall policy for sustainable entrepreneurship in consultation with the three subcommittees: the Economic Subcommittee; the Environment Subcommittee and the Social Subcommittee.

### **Organisational Profile**

This Report covers the activities of Seylan Bank PLC during the period from 1st January 2009 to 31st December 2009. From pages 138 to 226 we analyse the business and financial activities of the institution and provide detailed information on the Bank's performance over the past year.

Any questions or comments about this Sustainability Report should be directed to the General Manager/CEO of Seylan Bank PLC, Mr. Ajita Pasqual on Telephone No. 00 11 2456755.

## Seylan Bank Subsidiaries

Name of Company	% Holding of the Bank	Principal area of Business
Seylan Developments PLC	50.29% of Ordinary Share Capital	Property Development
Seylan Bank Asset Management Limited	100% of Ordinary Share Capital	Dealing in Government Securities

## Awards

Last year the Bank was placed first in the Trade Finance Quiz organised by the Trade Finance Association of Bankers, first in Inter-Bank Quiz organised by the Association of Chartered Bankers of Sri Lanka and first in the WISDOM 2009, the quiz challenge organised by the Management Club of Galle Face Hotel. The Bank was placed fourth in the Sri Lanka Masterminds Quiz organised by the Lions Club of Moratuwa.

## Stakeholder Dialogue

The Bank values the input of its multiple stakeholders and has put in place a number of processes to enable stakeholders to contribute to decision making within the Company. Stakeholder input has had an important impact on decision making within the Company previously and will continue to play a role within the institution.

The Bank has tried to engage with as many stakeholders as possible and to be sensitive to their views and interests. Customers and shareholders, generally tend to influence decision making more than others. However, we have tried to ensure a voice for employees, the community and other stakeholders as well, and endeavour to see that decisions are taken with all interests in mind.

## Shareholders

The board encourages the active participation of the shareholders at its Annual and Extraordinary General Meetings. The AGM is the main forum at which shareholders discuss performance, financial statements, returns, appointments and other relevant matters. The heads of the Audit, Credit and Integrated Risk Management Committees are present at the AGM to respond to any queries from the shareholders.

Shareholders are free to communicate with the Bank and their requirements and queries are promptly addressed. Suggestions made by them are implemented whenever possible. According to the Companies Act No. 07 of 2007, notice of at least 15 working days must be given to shareholders prior to the conduct of the AGM. The Bank ensures that it complies with this requirement.

## Customers

The Bank ensures that its products and services are driven and shaped by customer needs and aspirations. With this in mind, the Bank maintains close relations with customers and tries to obtain as much feed back and input as possible.

Customer feedback is one of the main methods the Company uses to improve the levels of its products and services and to respond to customer demands and expectations.

Customer surveys are conducted bi-annually by selecting a sample size from the existing customer base. Customer complaints are dealt with by the branch managers and the line managers and necessary corrective measures taken.

## Employees

The employees are represented by two trade unions: The Seylan Bank Employees' Union and The Ceylon Bank Employees' Union.

The unions play a crucial role in representing the interests of the employees with the management. Every month the Chairman meets representatives of the two unions to discuss employee relationships and employee grievances. In addition, the unions have regular access to members of the senior management team.

The Bank's 'Open Door' policy enables any employee to have a face to face discussion with the Executive Chairman. Every Thursday of the week is reserved by the Chairman for this purpose. The 'Open Door' Policy facilitates closer contact between employees and the senior management, enhances employee confidence and forges a dynamic organisational culture.

Regular e-newsletters are circulated by the Welfare Association and can be accessed on the Welfare Website.

## ECONOMIC IMPACT

The Bank is committed to generating both social and financial values. While generating financial value for our shareholders is one of the main activities of the Bank, we are also conscious of the larger social obligations we have. This obligation is larger given that we provide a broad range of financial solutions to a wide range of customers from all social segments. We are conscious of the impact we have on all these social segments and conscious of the impact our products and policies have on the economy and society in general.

In this respect, the Bank seeks to generate value in all geographical regions of the country and among all social segments. Creating new jobs; establishing new opportunities; designing specially-tailored products and services; and empowering socially disadvantaged groups; are all part of the Bank's attempts in value creation.

This part of the Report looks at the Bank's impact on investors, customers and employees.

The 'Value Added Statement' of the Bank shows the wealth the Bank has created with regard to its customers, employees and shareholders and the contribution of the Company to the Government's revenue and the economy in general.

The Bank generated a total value of Rs. 4.66 Bn. for the year under review as against Rs. 4.58 Bn. the previous year. This was distributed among government, the employees, and shareholders.

Rs. 2.34 Bn. or 50.24% of the value generated was distributed among employees as compensation. Rs. 0.99 Bn. or 21.25% was paid to the Government by way of taxes, including the Special Financial VAT. A sum of Rs. 1.33 Bn. was retained for further expansion of the Bank's activities.

In the year under review, the Bank supported a number of initiatives that had broad social goals by way of loan facilities. A sum of Rs. 4.2 Mn. was the loan outstanding for water purification, water supply and waste water management. A sum of Rs. 12.6 Mn. was outstanding for power generation including mini-hydro power projects.

## VALUE ADDED STATEMENT

Value added is the wealth the Bank has been able to create by providing clients with a quality, value added service.

Last year the Bank went through a crisis resulting from a sudden loss of public confidence. The Central Bank stepped into help stabilise the situation and appointed a new board of directors under the stewardship of the Executive Chairman. The Bank is proud to have confronted and overcome this crisis without any financial assistance from the State.

## Investors

Earnings per share increased by Rs. 1.93 (214%) during the year under review. This was a result of the increase in profits by Rs. 388 Mn. The reasons for this are discussed more fully on pages ... of the Income Statement.

The value that accrues to a shareholder is a combination of the dividend per share and the appreciation/depreciation of the value of a share over the medium to long term.

## Employees

The Bank has in place a market-based compensation scheme for its employees which is on par with the rest of the industry. Statutory requirements are stringently observed.

The Bank also provides medical insurance which covers most aspects of surgical and medical illnesses to its staff. In addition, employees are eligible for a variety of other benefits which include loans at concessionary rates and several other welfare facilities.

All employees are entitled to benefits under the Employees' Provident Fund (EPF) and Employees' Trust Fund (ETF). In 2009, the Bank's contribution towards the benefits under the EPF and ETF was Rs. 229.34 Mn. and Rs. 57.30 Mn. respectively.

The Bank has in place a comprehensive retirement benefits plan accounted for as per Sri Lanka Accounting Standard 16. The Bank measures the present value of the defined benefit obligation every year using the Projected Unit Credit Method defined by the Actuary. The following are taken into account by the Actuary when making the assessment: the existing interest rate; the rate of increase in salary and the retirement age of 55 years



## PROTECTING THE ENVIRONMENT

The Bank is committed to preserving and replenishing the physical environment. All our policies and products are designed with this end in sight. Through engagements with our customers we seek to spread the message of conservation to a broader audience as well. Some of our special products are designed specifically to protect the environment and others encourage clients to integrate environmental concerns into their project planning and implementation processes.

In this section we examine how the Bank's policies and processes help preserve the environment and ensure its sustainability. A key aspect of the Bank's environmental strategy has been the focus on the employees and on generating a cultural change within the organisation that is committed to protecting and preserving the environment.

The Bank has integrated energy-saving processes and technologies throughout the country and in all its branches. In redesigning its processes the Bank has focussed on the following areas:

- Energy Conservation
- Waste Management
- Paper Management

### Energy Conservation

The Bank constantly monitors its energy use with a view to reducing costs and making maximum use of the energy consumed. The main source of the energy is the national grid. The Bank is exploring the use of alternative and renewable sources of energy in its branches.

#### Energy Conserved

Head Office	Energy Consumption	
	2009	2008
Consumption (Units)	<b>2,504,928</b>	2,827,026
Expense (Rs.)	<b>49,300,577</b>	52,290,190

The head office and many of the Bank's branches have replaced their incandescent lamps with energy-saving bulbs. By 2011, we will have all our branches using energy-saving bulbs. Natural sunlight is used where possible.

The use of air-conditioners is reduced wherever possible and temperatures are regulated to create optimum levels of comfort. Computers come with low radiation levels and are programmed to transit to stand by mode within a short time of idling.

### Waste Management

The Bank's policies and processes have been adapted so as to reduce waste. Where waste does arise, the Bank tries to reuse and recycle wherever this is technically and economically feasible.

Some of the Bank's branches have introduced systems to segregate waste into plastics, solid waste, paper, glass and other materials. We are exploring several waste disposal and reuse options in this regard.

We have partnered with N.S. Gunaratne and Co. to dispose of discarded accessories from the Head Office and branches in an environmentally friendly way.

In the coming year, we hope to collect all used toner cartridges in a central location and ensure that they are disposed of an environmentally friendly way.

### Paper Management

The Bank's objective is to move towards a paperless office in the near future. With this in view the Bank has reduced substantially the amount of paper used within the office. Last year, the Bank spent Rs. 145.164 Mn. on stationery as against the Rs. 174.288 Mn. spent a year previously.

Expense	2009	2008
	Rs.	Rs.
Stationery	<b>145,164,498</b>	174,288,304

The Bank makes maximum use of electronic communication so as to reduce paper usage.

Communications with customers make optimum use of electronic channels and the Bank has attempted to keep paper communications to a minimum. Where possible, paper is recycled and reused.

## EMPOWERING PEOPLE

The Bank's role as a financial services provider means it plays a sensitive role in people's lives. The Bank has been conscious of this role and has focused on unleashing new opportunities for society in general and for its employees. Employees are the soul of the institution and we have endeavoured to create inspiring and safe workplaces for our staff. In this section we look at how the Bank's activities impact on society and on our employees.

### Category of Employment

Category	No. of Employees	Percentage (%)
Permanent	3,504	94
Contract	45	1
Trainee	184	5

### No. of Employes based on Country

Country	No. of Outlets	No. of Employees
Oman	1	5
Dubai	1	1
Saudi Arabia	1	1
Sri Lanka*	93	3,726*

### No. of Employes based on Geographic Breakdown

Province	No. of Outlets	No. of Employees
Northern	3	65
Southern	7	170
Eastern	5	109
Western	49	2,657*
Central	9	240
North-Central	5	106
Uva	2	52
Wayamba	5	148
Sabaragamuwa	8	179
<b>Total</b>	<b>93</b>	<b>3,726*</b>

\* No. of employees includes Head Office staff too

## Rewarding Innovation and Passion

The Bank has focused on building a dynamic team that is bonded by a common set of values and goals and committed to a notion of sustainable entrepreneurship. The Bank has encouraged productivity, rewarded passion and ensured the highest levels of workplace safety. The Bank continues to invest in their skills and future growth.

Every member of the staff came together during the recent crisis the Bank faced. The Bank had to respond to a sharp decline in public confidence and a change in the ownership and management structure of the Bank. The resilience and innovation displayed by the entire team enabled the Bank to make this transition relatively smoothly.

As at the end of 2009, the Bank had 2,550 employees in 93 branches across the country. The employee turnover for the year was 146 or 3.8 % of the total workforce.

Age	No. of Resignations	No. of Retirements
-19	-	-
20 - 24	43	-
25 - 29	36	-
30 - 34	26	-
35 - 39	22	-
40 - 44	8	-
45 - 49	7	-
50 & above	4	20

The Bank recognises the right to freedom of association and the right of employees to collectively bargain for their rights. Two major trade unions operate within the Bank. Some employees are members of both unions. The management is in regular consultation with representatives of the unions to ensure that

worker satisfaction is at optimum levels. The Bank also has an 'open door' policy where any employee can speak directly with the higher management.

#### **No. of Employees in the Unions of the Bank**

Name of Union/ Associations	No. of Employees
Seylan Bank Employees' Union	1,858
Ceylon Bank Employees' Union	2,435

#### **Breakdown of Employees per Category according to Gender**

*Grade	1	2	3	4	5	6	7	8	9	10	11	Total
Male	40	256	878	297	356	155	110	81	66	29	34	<b>2,302</b>
Female	1	-	560	268	344	110	79	46	11	5	7	<b>1,431</b>

#### **Breakdown of Employees per Category according to Ethnic Group**

*Grade	1	2	3	4	5	6	7	8	9	10	11	Total
Sinhala	30	238	1,303	527	640	239	167	98	59	28	35	<b>3,364</b>
Tamil	9	9	111	28	42	16	13	10	6	3	3	<b>250</b>
Muslim	-	9	18	6	10	4	6	11	7	3	2	<b>76</b>
Burger	1	-	2	4	7	6	2	6	5	-	1	<b>34</b>
Others	1	-	4	-	1	-	1	2	-	-	-	<b>9</b>

There were no cases of discrimination or unfair dismissal and there were no court cases that were pending against the Bank during the year under review.

The Bank ensures that all employees can practice their religion without any hindrance.

All permanent employees of the Bank are covered by Bank's Hospitalisation and Insurance Scheme. The Bank's Health Policy makes direct payments through the Sri Lanka Insurance Corporation to the respective hospital on behalf of the employee. Critical Illness Cover and Death Cover are also provided.

Educational expenses that pertain to a staff member's employment are partially reimbursed and subscriptions for membership in recognised professional bodies are covered by the Bank.

Every year the line manager will evaluate an employee's performance and discuss career advancement plans. Permanent employees (who make up 93.87% of the staff) are appraised every year, and employees on contract (who make up 1.23% of the workforce) are appraised at the time the contracts are renewed. Trainee banking assistants are appraised at the end of their training period.

We ensure that every employee goes through a periodic appraisal. Our goal is to ensure that the Bank's aspirations match the employee's expectations and to create a win-win situation for both.

#### **Child Labour**

The Bank has a zero tolerance of child labour. The Bank takes the position that all children under the age of 18 should have an opportunity to further their education and so does not employ anyone under that age. We attempt to promote this policy with our customers and business partners.

#### **Health and Safety**

Ensuring the highest levels of workplace safety is a priority for the Bank. The Bank periodically undertakes an assessment of its safety levels across the country to ensure that the highest levels of safety are observed across the institution. Last year, there were no accidents recorded on any of its premises.

The Bank periodically arranges for the staff to attend lectures on a variety of health-related matters conducted by medical experts from private hospitals.

Counselling is provided by the Bank on alcoholism, drug addiction, stress management and emotional illnesses. Regular fire drills and in-house programmes on first aid are also conducted.

#### **\* Staff Grades**

- |                                |                                       |
|--------------------------------|---------------------------------------|
| 1. General Office Assistant I  | 7. Assistant Manager                  |
| 2. General Office Assistant II | 8. Manager                            |
| 3. Banking Assistant I & II    | 9. Senior Manager                     |
| 4. Banking Assistant III       | 10. Chief Manager                     |
| 5. Executive Officer I         | 11. Assistant General Manager & above |
| 6. Executive Officer II        |                                       |



The Employees of the Bank taking part in the 'Jaya Maga' Campaign - January 2009



Region-wise sports festival for Bank staff was one of the many activities organised to foster solidarity and fellowship



Seylan Bank Sports Club participated in the 'Api Venuwen Api' Programme to assist security forces



The Bank donated Surgical Masks to the Cancer Hospital in Maharagama for Child Patients



The Bank made a donation of essentials towards the welfare of Internally-Displaced Persons



The Bank through the Sports Club made donations to Army Personnel of the Sri Lanka Army Camp, Minneriya

## Employee Welfare

Bank employees enjoy a number of benefits. These include:

Benefits	Full-time Employees (Permanent)
Bonus	Yes
Holiday Pay	Yes
Insurance	Yes
Staff Loans	Yes
Routine Medical Allowances	Yes
Spectacles Allowance	Yes
Honorarium Payment	Yes
Annual Membership Subscription	Yes

## Training

Training is a crucial component of the Bank's corporate philosophy. Every year the Bank invests substantially in upgrading the skills of its employees.

Last year, the Bank invested Rs. 27 Mn. on the training of its employees. 274 employees benefitted from External Training Programmes. A total of 7,366 participants attended Regional and In-House Training Programmes during 2009.

Employee Category	No. of Training Hours (X)	No. of Employees (Y)	X/Y Hours
1	360	41	8.78
2	2,530	256	9.88
3	25,570	1,438	17.78
4	10,844	565	19.19
5	10,891	700	15.56
6	3,664	265	13.83
7	2,101	189	11.12
8	1,215	127	9.57
9	477	77	6.19
10	80	34	2.35
11	72	43	1.67

## Sports

The Bank has an active sports club and a welfare society, both of which are self-managed.

Among the main events for the year are the regional sports festivals organised in the different regions. Last year, sports festivals were held in Kandy, Koggala and Polonnaruwa and brought together representatives from branches in the vicinity.

Apart from participating in a range of sports activities, participants also have the opportunity to interact with their peers at a reception and dinner afterwards.

## Promoting Human Rights

The Bank is committed to all those human rights enumerated in the Constitution of Sri Lanka and the international covenants that the country has signed. Promoting and protecting human rights is an important part of our endeavour in sustainable entrepreneurship.

The Bank respects, protects and promotes the rights of all its employees, including the labour-related rights, and also promotes the rights of all other stakeholders. The Bank encourages our customers and business partners to integrate similar commitments in their business practices.

Ensuring that women have equal rights within the institution is important to the Bank. We attempt to create an environment in which women feel comfortable and perform at optimum levels. Allegations of harassment are investigated promptly and remedial measures taken.

## EMPOWERING LIVES

Every year, the Bank invests in the future of the broader society. Through these initiatives the Bank hopes to empower disadvantaged groups and create new opportunities for other social segments.

## Promoting Ethnic Harmony

The end of the war in 2009 has created a massive opportunity for the country. For the first time in thirty years, the Government's writ runs over the entire country. This opportunity must be seized by the state, business and civil society and made use of to lay the foundations for a peaceful and prosperous society.

In the past year, the Bank focussed on promoting ethnic harmony and promoting reconciliation among the different communities. It is important to provide the opportunity for all communities to overcome the trauma of the war, to move forward in a spirit of harmony and to feel a sense of belonging.

Over the years, the Bank has been involved in promoting a sense of harmony by sponsoring initiatives in connection with the Sinhala and Tamil New Year. Last year was no different. The Bank sponsored the traditional 'Oil Anointing Ceremony' (Hisa Thel Gama) at the Haththaka Rajamaha Viharaya, Niyagama, Hiniduma and also sponsored the 'Kokila Wasanthaya Avurudu Ullela' held at the Poddiwela Maha Vidyalaya organised by the Niyagama Divisional Secretariat and Niyagama Provincial Council.

The Bank also made significant contributions towards the Annual Kataragama Esala Perahera and contributed towards the live telecast of the Annual 'Jasmine Flower Offering Ceremony' (the Pichcha Mal Poojawa) which was held for the 20th year in Anuradhapura and organised by the Shanthi Foundation - Seruwila Buddhist Centre.

The Bank sponsored the Special TV Programme on the 'Madhu Festival' in August 2009. The Madhu Shrine is venerated by Sri Lankan Catholics from all communities and the festival was conducted in 2009 in an atmosphere free of violence for the first time after almost 30 years.

The Bank made a contribution of Rs. 1.5 Mn. to help the internally displaced persons who were being held in camps in Vavuniya and Mannar.

The reconstruction of the Yal Devi railway line linking the South with the North is a major part of the Government's reconciliation programme. The Bank made a significant contribution towards this initiative. Facilitating the movement of people between the ravaged North and the South of the country is vital if the country is to move into an era of peace and ethnic harmony and the Bank is proud to have been part of this initiative.

## Empowering the Disadvantaged

There were a number of other initiatives in which the Bank was involved.

The North-Central Province has recently been the site of a number of cases with kidney problems. This has been traced to high levels of calcium in the water in that area.

In 2009, a special renal care and research centre was built by the National Kidney Foundation in the Anuradhapura District in order to treat those patients. The Bank made a significant contribution towards the cost of the electrical cables for the transplant theatre complex.

Surgical masks were donated, with the assistance from the Seylan Bank Sports Club, to the Cancer Hospital in Maharagama, to be worn by the child-patients undergoing surgical treatment.

The Bank also supported the Sri Lanka Model United Nations 2009 Conference, contributed to Sri Lanka International Film Award Ceremony and helped the Association of Professional Bankers of Sri Lanka which, conducted their 21st Anniversary celebration in September 2009.

## 'Grameen' Loans

The Bank provides 'Grameen' loans for agriculture, fisheries and small industries. The objective of these loans is to enable small business folk to engage in entrepreneurship without the risks and constraints of conventional financing.

These loans start at Rs. 5,000/- and are progressively increased to Rs. 100,000/- depending on how the customer performs.

#### **Grameen Loans**

No. of Beneficiaries	Loan Outstanding Rs. Bn.
157,883	2.499

#### **Other Sector Loans**

Sector	Amount Rs. Mn.
Agriculture	212.09
Fisheries	39.15
Education Development	190.15
Health Services	159.45
Pharmaceuticals	58.40

### **GRADUATE LOANS**

The Bank provides small loans at concessionary rates of interest to graduates who wish to establish their own businesses. Rs. 391.1 Mn. was dispensed under this scheme during the year under review.

#### **Senior Citizens**

Citizens over the age of 55 receive a number of benefits from the Bank.

Fixed deposit holders receive premium interest rate on their deposits.

Critical insurance cover up to Rs. 50,000/- is provided.

In the case of saving accounts senior citizens are entitled to:

The cost of lenses for cataract surgeries.

Reimbursement of the cost of surgery.

Birthday gifts.

The reimbursement of reading material.

The reimbursement of medical bills up to Rs. 5,000/- for those over the age of 70.

### **Corruption**

The Bank has a policy of zero tolerance on corruption. It does not encourage ethically unsound or corrupt practices on the part of our customers or business partners. The Internal Audit Department carries out Audits in branches to ensure compliance in this regard.

Regular training programmes on anti-corruption are conducted among the Bank's employees. Last year, 35 training programmes on anti-corruption were conducted for the staff.

### **Anti-Competitive Behaviour**

The Bank does not engage in anti-competitive behaviour and does not support other institutions engaging in such practices. No legal actions have been filed against the Bank in this regard.

### **Customer Privacy**

The Bank takes the utmost care to respect customer privacy and ensure that customer data and information is fully protected. Employees in possession of confidential data are required to take an oath of secrecy.