

STATEMENT OF ETHICS AND BUSINESS PRACTICES **FOR THE EMPLOYEES**

This Statement / Code of Ethics and Business Practices for employees of the Corporation including its CEO, Executive Directors, Senior Executives, Officers and Staff (workmen) has been designed in pursuant to the of Code of Corporate Governance for insurers–2016 and is intended to set Ethical Standards, recognize and deal with ethical issues and help foster a culture of honesty, accountability and integrity. This code lays down the principles, sets the tone and provides guidance. These are beyond the legal and statutory requirement, which will take precedence over these rules, prevail and must be adhered to. However, this code does not replace the existing laws, regulations and rules of the Corporation. This statement / code will be displayed on the website of the Corporation and will also be made part of Annual Report of the Corporation.

Employees will adhere to the code of conduct in their dealings both internally and externally and in their own areas of responsibilities for protecting and enhancing values and reputation of the Corporation. Each employee is required to comply with the terms of this statement / Code and is to be agreed upon by each member and duly signed in token of acceptance, effective _____, 2016.

1. Familiarization and adherence to rules & regulations:

The employees shall familiarize themselves with the Corporation's rules and regulations including service rules, internal procedures, code of ethics, customs, and practices pertaining to the Corporation's operations. They will abide by all rules and orders issued or prescribed by the management of the Corporation from time to time. In addition thereto, the employees shall familiarize themselves with the laws and statutory rules and regulations, applicable to them and in particular the rules, regulations, guidelines, codes, notifications, etc. issued by the Corporation and / or applicable to them in performance of their duties to the Corporation.

2. Basic Work Ethics:

- Employees shall maintain utmost courtesy and exemplary manner while interacting with customers or with each other.
- Employees are expected to wear appropriate business attire while at work and must maintain a good standard of personal hygiene.
- Punctuality is one of the basic rules of office discipline, which needs to be meticulously observed by all employees of the Corporation. Employees, who are going to be late for any reason, should inform their departmental head as early as possible.
- Employee must notify the Corporation as early as possible, of any change in their personal data e.g. marital status, educational/ professional qualification, change of home address, telephone numbers, change of group insurance /provident fund nominee, birth of children, death in the immediate family etc.

- Officers are strongly advised to obtain prior approval of their authorizing officers before leaving their stations for work-related travel, holidays, long weekends, or any other purpose and shall leave their contact numbers with the departmental heads. In case of absence departmental heads, they shall seek prior approval of the next immediate supervisor or senior and leave their contact numbers, accordingly.
- The Corporation has provided e-mail facility to its executives / officers, which is intended to promote effective communication relating to its operations. The e-mail system should therefore be used for that purpose, only. Personal messages may be sent only in cases of urgencies, but these should respect the primary purpose for the e-mail system. Further, there should be no gossiping/chatting through emails. Under no circumstances whatsoever an employee shall use the email for transmitting obnoxious, threatening, incriminating or defamatory messages. All communications will remain the property of the Corporation, and it will reserve the right to retrieve the contents of the messages for the purpose of monitoring. In this way, if an employee views objectionable material which has been either downloaded or received through internet or email system shall be held accountable for all activities created under his / her password.

3. Communication:

Employees, who have been provided mobiles phones by the Corporation, shall keep their phones on / operative 24 hours. Employees should keep their mobile phones on vibration (preferably) or on basic tones while on duty. Songs/instrumental beats or animal tones are strictly prohibited. Employees are advised to take care of their mobile sets. In case of theft, the Corporation shall not hold any responsibility. In case of their non-compliance, the mobile facility can be withdrawn.

4. Integrity, Honesty and Fairness:

The Corporation and all its personnel, in the conduct of its business shall observe high standards of integrity and fairness in all dealings with policyholders, vendors, market intermediaries, auditors, suppliers and regulatory and other government authorities. Employees shall at all times in the conduct of their business:

- Maintain high standards of service.
- Exercise due diligence.
- Exercise independent professional judgment.
- Exercise highest ethical standards.
- No compromise on the interest of the Corporation and its image and reputation or the interest of its policyholders.

5. Conflicts of Interest:

Employee must take all reasonable steps to avoid any conflict of interest between the Corporation and / or such employee and any Customer or other entity. In case of any probability of occurrence of conflict of interest, the concerned employee must immediately report the same in writing to his/her supervisor or departmental head or compliance & risk management or senior management.

No employee may accept any gift or other benefits from any person or entity unless it is abundantly clear from the small value of the gift of complementary nature given by such grantor to others in normal course of its business and that

benefit of and from the circumstances in which it is given such that no attempt has been made to compromise the interests of the Corporation, any policyholder and / or an employee.

6. Disclosure of Interest:

Each employee shall ensure that they identify and avoid any situation of actual or apparent conflict of interest, whether the situation involves the employee directly or a member of his or her immediate family. Every employee, including his/her spouse and minor children, who is in any way, whether directly or indirectly, concerned with or interested in any contract or arrangement entered into, or to be entered into, by the Corporation shall disclose the nature of his/her concern or interest.

7. Money Laundering:

Employees must not engage in money laundering and have a legal and a moral obligation to immediately report suspected instances of the same to their respective departmental heads and comply with the mechanism of AML prevailing in the Corporation.

8. Outside Employment and Business Interests:

Each employee shall be deemed to be a full time employee and shall therefore not engage himself/herself in any other employment or profession even on part time basis. Outside employment of any nature is not permitted unless specially approved in writing in advance by P&GS Division, after obtaining necessary approval from the competent authority. Such permission may be given only at the discretion of the Chairman/Chairperson/CEO and that too if the interest of the Corporation or its affairs are not jeopardized or affected in any manner.

No employee may participate in outside business interests, not involving employment, which in any way interferes with Corporation work or which puts him/her in a position of conflict with the interests of the Corporation or any Customer.

9. Insider Trading:

No employee shall indulge in insider trading, front running or other prohibited or unethical dealings. The employee will be exclusively liable for such unlawful acts and the Corporation shall have the right to take appropriate action under the law.

The employee shall not purchase or sell any securities at the same time when such securities are sold or purchased by the Corporation.

10. Protecting or dealing in Corporation's Assets and Services:

The employees shall safeguard Corporation's physical assets and those entrusted with the specific task shall also ensure that its buildings are properly maintained.

The employees shall not enter into leasing, renting and sale/purchase of any kind with the Corporation. However, this restriction shall not apply in case of purchase by paid directors (Executive Directors) of vehicles, laptops, mobile phone devices and iPads which remained in their own use, provided such sale is covered under the employees service rules duly approved by the Board and is effected at least at book value at the date of such transaction.

11. Confidentiality:

It is a condition of each employee's employment that he/she does not improperly gain access to, or allow others to gain access to, unpublished confidential information concerning the Corporation or any Client and further that such information is not used for improper purposes or personal gains or for the benefit of any third party.

Any information obtained through an employee's employment that is not available to the public is strictly confidential and must not be disclosed to any other person or used for any other purpose, other than in the course of the employee's duties and obligations and for the benefit of the Corporation. In particular, no employee shall disclose to or discuss with any other employee or an outsider any information pertaining to any investments or disinvestments made by the Corporation on its own account or discretionary or non-discretionary accounts managed by the Corporation.

Without exception, all media enquiries, or enquiries from investigating agencies such as Police, FIA, CIA, NAB, etc. and law enforcement agencies, tax authorities, lawyers, regulatory bodies or any other concerned with the affairs of the Corporation or its customers must be directed, initially, without comment, to concerned State Life Insurance Corporation authorities.

Employees are strictly prohibited from making any comments or giving out any statements to press or any other media services including electronic media and web sites including social media that expressly or impliedly refers/relates to or reflects upon the business and other affairs or activities of the Corporation, its management, its policy holders / customer(s) or any other employee(s) of the Corporation.

The Corporation requires its employees to maintain strict confidentiality regarding the following matters:

- Remuneration, Increments and bonus
- Other terms of employment
- Business affairs of the Corporation in relation to other employees/policyholders / Corporation's Assets
- Third parties engaged in business with the Corporation
- Other companies, firms and institutions

Confidential information concerning a customer, employee or supplier shall never be disclosed to a third party except pursuant to applicable laws or regulations, or a court order or other legal process, or after the informed consent of the customer, employee and/or supplier in writing.

If an employee wishes to contribute an article in print media or give any media interview or public address, it will mandatory for that employee to get prior approval from P&GS Division through his immediate supervisor.

1. No employee of Corporation is permitted to:

- Act as agent for an insurance Corporation
- Be connected with the formation or management of any Corporation, business enterprise or other organization, without prior written permission of the CEO/Chairperson/Chairman
- Engage in any other commercial business or pursuit either on his own account or as agent for other person(s) or entity (entities)

- Accept, or seek any outside employment or office, whether stipendiary or honorary, without the prior written sanction of the CEO/Chairperson/Chairman
- Undertake part time work for a private or public body or private person, or accept fee, without the permission of the CEO/Chairperson/Chairman
- Take any drugs or engage into transactions pertaining thereto
- Engage in gambling
- Exhibit unbecoming behaviour including rowdiness, drunkenness or violence.
- Participate in any political or subversive activities or discuss or engage in any political, communal, religious or sectarian discussion with other employees or outsiders whether personally or over the phone or through emails.
- Remain absent from duty without obtaining prior sanction of leave, except in case of an extreme urgency in which event ex-post facto sanction shall be obtained.
- Leave the Corporation premises during office hours (excluding approved recess for lunch) without the permission of or instructions from immediate superior.
- Act unprofessionally.
- Indulge in any kind of harassment including sexual harassment or intimidation whether committed by or against any senior/junior, co-worker, customer, vendor or visitor.

2. Handling of Grievances:

The Corporation shall attract and appoint diversified staff from various corporate, geographical, ethnic and religious backgrounds by also adhering to Provincial, Regional and other quotas prescribed by the Federal Government. The mechanisms shall be institutionalized to safeguard against the risk of violation of accepted norms of conduct in the day-to-day interaction with each other. All staff members are advised to report any such grievances to their immediate supervisors. In case of any complaint against their immediate supervisors, reporting should be done to the next level of officer. If the senior officer fails to address the matter, the reported grievance should be brought into the notice of Head of P&GS Division.