



# **KBZ BANK LIMITED**

**HR POLICY**

**ON**

**NO GIFT**

**HUMAN RESOURCE DEPARTMENT  
SEPTEMBER 2020**

## **KBZ BANK – NO GIFT POLICY**

### **A. Preamble**

1. Our reputation for excellence and integrity is a key competitive advantage and we must never do anything to put that reputation at risk. The No Gift Policy is adopted by the Bank to prevent real or perceived conflicts of interest that may arise. Because it is impossible to describe every potential conflict, the Bank will rely on your commitment to exercise sound judgment, to seek advice when appropriate, to disclose activities as required by policy and to adhere to the highest ethical standards.

2. In general, you may not accept gifts, hospitality or the conveyance of anything of value (including entertainment) from current or prospective customers, clients, vendors or suppliers. You may never accept a gift under circumstances in which it could even appear to others that your business judgment may be compromised. Similarly, you may not accept or allow a close family member to accept gifts, services, loans or preferential treatment from anyone (whether they are clients, suppliers or others) in exchange for a past, current or future business relationship with the Bank.

3. Cash gifts or their equivalent (e.g., gift cards or vouchers) may not be accepted under any circumstances.

4. The Bank recognizes that there would be situations where it may not be possible to decline the gift (e.g. the gift is presented in front of others) without putting those present in an awkward situation. In such a case, the No Gift Policy still allows the receipt of the gift and the employee is required to declare the gift in accordance with the stipulated procedure.

5. The No Gift Policy addresses the receiving of gifts and entertainment. The giving of gifts and entertainment is a separate subject that will be addressed by Finance. If you have any questions about the appropriateness of accepting a gift, invitation, lucky draw or other prize, you should discuss the matter with your manager or HR prior to participation or acceptance.

### **B. Scope**

6. This policy covers all employees, whether they are part-time, full-time or term-contract, working with the Bank.

7. An employee's working relationships may bring him or her into contact with outside organizations where it is normal business practice or social convention to offer gifts. Such gifts to an employee or their family can place the employee in a difficult position. Therefore, no employee or any member of his or her immediate family should accept a gift from a third party with existing or potential business relations with the Bank.

### **C. What is a Gift?**

8. Gifts include, but are not limited to the following:

- a. Money, goods, service and any other form of benefit offered by vendors, suppliers, customers, potential employees, potential vendors, and suppliers, or any other individual or organization;
- b. Favours or preferences as regards price, or otherwise, from contractors or vendors which is not generally available;
- c. Invitations to golfing or other sporting activities by customers, vendors or other party;
- d. Visits to Conferences or events offered by another party;
- e. Dinners, meals, parties or entertainment offered by banks or other party;
- f. Vendor or potential vendor or supplier-provided food, beverages, meals, or entertainment including attendance at sporting events.

NB: The important difference between, for example, attendance in an official capacity at a function organized by the Bank or one of its associates and the acceptance of hospitality from a private individual or firm should be recognized.

#### **D. What do I do when a gift is offered?**

9. The Bank requires its employees to ensure that gifts are declined. This applies, whether the gifts are offered within or outside normal working hours and in Bank premises or outside Bank premises. Employees should politely decline the gift and inform the giver of the Bank's No-Gift Policy. Suggested wordings are contained in Annex A.

10. Even if the gift is sent by post, the employee must return the gift with a suitably worded note of thanks. Suggested wordings are contained in Annex A.

#### **E. What do I do when it is not possible to decline a gift?**

11. In the event that it is not possible to decline the gift, the employee is required to declare the gift by completing the Gift Declaration Form. He or she will submit the Form together with the gift to the Head of HR through his direct reporting supervisor. For employees outside Yangon, the form and gift should be handed over to the Branch Manager who should arrange to send these forward to the HR Department.

12. The HR Department will assess the value of the gift and recommend its disposal. Disposal may include selling the gift and donating the money to charity or handing the gift to charity. The decision to manage the gift will be taken on a case-by-case basis by the senior management.

13. If the gift is a plant or flowers, this will be displayed in the lobby, or at another central location where all employees may enjoy their presence.

14. Perishables gifts of food that may arrive during the holidays, and at other times of the year when gift giving is traditional, belong to all staff even if addressed to an individual employee. Under no circumstances is the employee permitted to take a food gift home; such food gifts must be shared with all staff during work hours at the workplace.

## **F. Exceptions**

15. The only exceptions to this No-Gift Policy are trivial gifts such as a calendar, diary, mugs, t-shirts, pens, trade show bags & all other items that employees obtain as members of the public at events such as conferences, training events, seminars, and trade shows, that are offered equally to all members of the public attending the event. It also includes attendance at and food, beverages and items provided at events, exhibitor trade show floor locations, press events and parties funded by conference or event sponsors.

## **G. What happens if an employee violates the policy?**

16. An employee who violates the No-Gift Policy is liable for disciplinary action including but not limited to, termination of employment or dismissal.

Regular review of this policy is conducted by our Board to ensure they remain timely and relevant. Our most recent review was completed and approved by the Board on 02 September 2020.

**GIFT DECLARATION FORM**

Employee's Name : \_\_\_\_\_

Department/Branch : \_\_\_\_\_

Gift Received on (Date) : \_\_\_\_\_

\_\_\_\_\_  
Name of Giver :

\_\_\_\_\_  
Company :

Relationship of Giver/Company :

\_\_\_\_\_  
to the Bank  
Description of Gift : \_\_\_\_\_

\_\_\_\_\_  
Signature of Employee Date

\_\_\_\_\_  
Signature of Direct Reporting Supervisor Date

\_\_\_\_\_  
Signature of Branch Manager (For Branches outside Yangon) Date

Received by: HR Department on (date) : \_\_\_\_\_

Approximate Value of Gift : \_\_\_\_\_

Recommended disposal : \_\_\_\_\_

Name of HR Person : \_\_\_\_\_

Approved by (Name, Signature & Date) : \_\_\_\_\_

## **Annex A**

Suggested verbal or written response to decline gift :

Thank you for the gift. We are truly appreciative of your generosity and kindness. I need to inform you that KBZ Bank has a no-gift policy. Thus I am afraid I am unable to accept the gift. I hope you understand.

Thank you once again for your thoughtfulness and generosity.