



KBZ BANK LIMITED

HR POLICY

ON

PROFESSIONAL BEHAVIOUR

**HUMAN RESOURCE DEPARTMENT
SEPTEMBER 2020**

KBZ Bank Professional Behaviour Policy

INTRODUCTION

To foster a safe, respectful, and supportive working environment for everyone, we are implementing a Professional Behavior Policy (PBP) rooted in the heart of our core values ; Metta, Virya and Courage. KBZ Bank does not tolerate any form of unacceptable workplace behaviours such as bullying/harassment, discrimination, violence, sexual harassment, vilification and victimization.

PBP will be carried out with full support from the management and complaints under PBP will be prioritised and investigated confidentially to keep our employees free from all forms of above mentioned unacceptable workplace behaviors at KBZ Bank.

SCOPE:

This Policy is applicable to all KBZ Bank permanent, temporary & contract employees and support staff (including directors, consultants & contractors)

Moreover, PBP covers conduct:

- At work and all Bank premises.
- At work-related social media, events or any place of work-related functions
- Any means of electronic communications
- During business trips

Professional Behavior Policy as outlined here will be in effect as of Monday, September 16th 2019

- Unacceptable workplace behaviors at workplace :
 - Bullying/Harassment
 - Discrimination
 - Violence
 - Sexual Harassment
 - Vilification
 - Victimization.
- Complaint procedure under KBZ Bank Professional Conduct Policy
- Contact Officers
- Roles and Responsibilities of all Employees, Managers and Human Resources
- False Allegations
- Disciplinary Actions

KBZ Bank promotes a professional and supportive working environment and the following conducts are prohibited workplace behaviours we do not tolerate :

1. Bullying/Harassment :

Bullying is a repeated and unreasonable behaviour directed towards one or more persons (the targets) by one or more persons, that creates a risk to safety or physical/mental health.

Harassment is an unwanted behaviour that offends, humiliates, threatens, or intimidates a reasonable person and targets on gender or race.

Examples of bullying/harassment include, but are not limited to, the following:

- Intimidation
- Isolating someone from workplace activities
- Assigning someone impossible tasks or withholding information necessary to complete the task
- Spreading malicious rumours / gossip about someone with an intent to harm the person.
- Repetitive offensive comments about someone's work or personality
- Yelling, profanity, shouting or abusing someone
- Humiliating a person through gestures, sarcasm, criticism, and insults in front of others;
- Threat of severe punishment that do not follow KBZ Bank's standard disciplinary procedures
- Repeated offensive messages (e.g., via email, telephone or other means)
- Persistent and unjustified criticisms, often about petty and irrelevant or insignificant matters.
- Body shaming

2. Discrimination:

Discrimination is treating someone or a group of people less favorably than another person or group because of a particular characteristic(s) such as race, gender, religion, sexual orientation, disability, etc.

Examples of discrimination include, but are not limited to, the following:

- Making sexist comments
- Excluding or isolating someone due to personal characteristics

- Managers hiring/promoting a disproportionate number of male/female employees without following the evaluation criteria

3. Violence:

Violence is a physical attack, ie, direct or indirect application of force by a person to the body (or clothing/equipment worn) of another person, which risks safety. Violence also includes a behaviour that causes a reasonable person to believe that they are in danger of being physically attacked.

Examples of Violence include, but are not limited to, the following:

- Physical assault to other staff or customer
- Bringing a weapon to work (where a weapon is needed for work like security is an exception).
- Intentional pushing or tripping etc
- Physical damage to property belonging to KBZ, team or customer

4. Sexual Harassment:

Sexual harassment is an unwelcome sexual behavior, which can make a person feel offended, humiliated, or intimidated. Sexual harassment is not consensual interaction, flirtation, or friendship.

Sexual harassment can be a single incident, so any extreme action or remark will be investigated under Sexual Harassment.

Examples of sexual harassment include, but are not limited to, the following:

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging or inappropriate touching
- Making uncomfortable and degrading comments about a person's clothing, personal behavior, personal (romantic) relationships, or body
- Making sexual or sex-based jokes or comments or gestures
- Requesting sexual favour or date including repeated requests for dates, especially after a prior refusal
- Intrusive questions and spreading rumours about a person's personal or sexual activity
- Threatening a person for rejecting or refusing sexual advances
- Making promises in return for sexual favours
- Persistent questions or insinuations about a person's private life

- Offensive phone calls, text messages, letters, email messages or computer screen savers
- Display of sexually explicit, inappropriate or suggestive material in the form of drawings
- Sexually-suggestive gestures
- Following a person around/ stalking
- Invitation to inappropriate locations
- Leering or staring at someone or parts of their body

5. Vilification:

Vilification is a public act which incites, encourages or urges others to hate, have serious contempt for, or severely ridicule, a person, or group of people on the ground of race, religion, sexuality or gender identity of the person or members of the group.

6. Victimization:

Victimization is an act, or a threatening act, to the detriment of another person who has made a complaint under this Policy. This includes any retribution or intimidation towards someone who has made a complaint, witnessed an incident or had a complaint made against them.

Employees will not be disadvantaged in their employment conditions or opportunities as a result of lodging a complaint or participating in an investigation of Prohibited Behavior. If you believe you are experiencing any violation of PBP, incident(s) can be reported as per this Policy.

The complaint may be made verbally or in writing. For reports made verbally, the details provided by the employee will be recorded by HRBPs/Head of HRBP. Please be prepared to provide as much detail as possible, including but not limited to details of the incident(s), name and position of the perpetrator(s), date, time and place of the incident, any witnesses and any attempts made from the victim to stop the harassment.

Upon receiving the complaint and initial investigation, the HRBP/Head of HRBP will initiate a formal investigation. Confidentiality, fairness, and impartiality will be maintained throughout the entire duration of the investigation. During the process, the complainant, the accused harasser and any related third party who have knowledge of the incident will be interviewed individually. The investigator will then review all factual findings and the context in which the incident happened to determine whether harassment has occurred. At the end of the investigation, the investigator will issue a written report including the allegations, evidence, findings, and conclusions to the complainant, alleged harasser and related [manager/supervisor/HRBP].

CONTACT OFFICERS:

KBZ Bank has Contact Officers who provide employees with information and support about discrimination and harassment, including options for dealing with discrimination or harassment in the workplace. Contact officers are responsible for:

1. listening to employees and providing information about options to resolve discrimination or harassment
2. promoting and communicating this Policy within the workplace
3. balancing confidentiality with the obligation of KBZ Bank's Code of Conduct
4. Your HR Business partner is the first Contact Officer under this Policy. First level of escalation can be done to the Head of HRBP and the second level of escalation will be done to Head of Human Resources.

ROLES AND RESPONSIBILITIES

All employees including managers and HR have the responsibility to ensure that we fully understand and comply with Professional Behaviour Policy across the Bank. Employees and managers, in partnership with Human Resources, are responsible for:

1. All Employees are responsible for

- Compliance of the Policy
- Respecting colleagues, valuing them, and behaving professionally.
- Making complaints about Prohibited Behaviour by following the Complaints Procedure if situation arises
- Maintaining confidentiality about investigations and providing accurate and honest information if needed

2. Managers are responsible for

- Monitoring the working environment to ensure that acceptable standards of behaviour are observed at all times
- Informing Human Resources about complaints, if received by them, of Prohibited Behaviour
- Human Resources will guide the manager through the requirements associated with resolving the complaints
- Documenting the information obtained and actions taken in addressing complaints and retain in a secure location

3. Human Resources Staff are Responsible for

- Providing advice and guidance to those involved regarding relevant Human Resources policies and procedures
- Providing options to employees who believe they have been treated unfairly
- Treating information with the appropriate level of confidentiality. Information received may however need to be actioned including providing relevant senior managers and Corporate Legal with a briefing and arranging for proper follow-up actions
- 4. Investigating escalated complaints by the complaint procedure

- 5. Monitoring that the actions required to resolve formal complaints have been

FALSE ALLEGATIONS:

Where allegations of inappropriate behaviour are unfounded, the complainant will be informed of the decision, and the factors leading up to it.

The Policy protects the employee from filing a complaint in good faith, i.e. if allegations are not confirmed, no action will be taken against the complainant or accused employee. Having said so, one should exercise due care to ensure the accuracy of the information when complaining under this Policy.

If an employee makes malicious or vexatious allegations and persists with making them with intentions to damage the reputation of another employee, appropriate disciplinary action will be taken against that employee. Legal action may be taken against the complainant by the employee against whom the complaint was made.

DISCIPLINARY ACTION:

KBZ Bank has a zero-tolerance for violations under the Professional Behaviour Policy and all complaints will be investigated. Any violation of PBP will be subject to appropriate disciplinary action such as

- Verbal/Written warning
- Stopping of annual salary increase or deferment of promotion
- Demotion
- Dismissal and Termination of Contract
- Legal Action

KBZ Bank acknowledges the inputs and suggestions in the Professional Behavior Policy from Business Coalition for Gender Equality (BCGE).

BCGE coalition of companies that are committed to promoting gender equality in the workplace in Myanmar. KBZ Bank will continue to partner with BCGE in the roll-out of the gender equality training and awareness sessions.

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.