



Code of Conduct

Our Vision

A future where everyone can participate fully in
the financial system

Our Purpose

To bring financial freedom to our users



GoTyme Bank Culture and Values

We believe the **empowerment** of each other will unlock GoTyme Bank's potential

- We believe in leading through context, not control.
- We believe working yourself out of a job is a big part of your job.
- We debate decisions as a team, but we make decisions as individuals. The team backs the decision.
- We are huge fans of our customers and colleagues. We rapidly cheer them along their path to success.
- We hold each other to the highest standards of integrity, respect, and honesty; we courageously hold people to account if they fall short.

We see **transparency** as our source of trust.

- We err on the side of being overly transparent to equip our colleagues and customers with the knowledge to make informed decisions.
- We believe the best idea should always prevail, not the view of the most senior person.
- We expect each other to speak out when something isn't right, silent disagreement is not tolerated
- We admit mistakes – to each other and to our customers.

We re-invent banking through **innovation** backed by execution excellence

- We do not like to be told it cannot be done or that it has always been done this way. We push the boundaries & challenge the status quo.
- We are not here for a niche play or moderate success. We are here to win at scale
- We encourage bold decisions, many of which will fail. We embrace, learn from, and even go as far as celebrating those failures.
- We must be great, good is not good enough. Re-imagining banking is not just about new products and innovations, it's about doing the basics better than anyone else.
- We believe simplicity is synonymous with beauty. Less is more.
- We believe disrupting an industry requires a team with diversity of background, demographics, and thought.

We bring an over-dose of **grit** and ownership to the playing field

- We are a good home for those with scars and unfinished business. We like people who have lost battles but have the hunger to fight again.
- We are a startup, we are always pushing a boulder uphill. If we stop pushing, it will crush us. We keep pushing.
- We attract people who aren't scared to get their hands dirty and run towards, not away, from the fires.
- Some people create energy, others sap energy. We are creators.
- We think as owners, not renters of the business. We invest and spend as if the money is our own.

We believe practicing compassion and **humility** will bring delight to each other & our customers

- We always assume positive intent, from our customers and each other.
- We recognize that there is always something to learn from our customers, each other, and our partners. We listen twice, then we speak.



- We take what we do seriously. But we do not take ourselves too seriously.
- We embrace self-advancement, but not at the expense of colleagues and customers.
- We hire people full of questions, not answers.

Purpose of the Code

The Code of Conduct defines what is expected from the employees . It is based on policies and standards we have set as a Bank. The responsibility to know and understand these policies and standards lies with each employee.

No code can address every possible situation. Where a specific act is not mentioned or there is doubt on what action to take, the employee should always seek guidance.

Complying with the Code

The Code, along with our policies and standards, apply wherever we operate. It is the corner stone of our business integrity and ethics. It must be observed by all GoTyme Bank employees, officers, and directors, including interns. We also expect that individuals who have been assigned to perform work or services on behalf of GoTyme Bank such as independent contractors and third-party associates and agencies to comply with the Code.

For questions and guidance, the employees may reach out to their respective line managers and/or People and Culture Department.

If unsure what to do or concerned that the Code is being broken, the employee has the responsibility to “speak up.” The Code explains how to do this and the protections to ensure that there is no retaliation against those who speak up.

Responsibilities

GoTyme Bank will:

- provide a working environment which reflects high ethical standards which promotes the physical, social, and mental well-being of its employees free from all forms of physical, sexual, and psychological abuse including harassment, bullying, and intimidation.
- ensure that all employees understand the Code and receive appropriate training
- monitor employees and related third parties to ensure everyone complies with the Code
- encourage employees to seek help, without fear of punishment or retaliation, and provide confidential resources for employees to get advice or report Code violations
- deal effectively with any concerns about conduct, and
- work only with companies who share our commitment to ethical behaviour.

As a GoTyme Bank employee, each must:

- read, understand and regularly review this Code
- be alert to any Code violations and promptly report them
- not knowingly help another person to violate the Code

- participate in training, to learn about business ethics, compliance, laws and regulations, and cooperate fully when asked to help us investigate alleged violations

Reporting Concerns and Whistleblowing

It is the responsibility of all employees, including the Board of Directors and Senior Management, to comply with this Code as well as the rules and regulations of the Bank, and to report violations, whether actual or suspected.

An individual who makes a “protected disclosure” in good faith shall not suffer harassment, retaliation, or adverse employment consequences. Any person who retaliates against any individual who makes a protected disclosure shall be subject to discipline, including termination. “Good faith” encompasses, among other things, an honest belief, the absence of malice, and the absence of design to defraud or to seek an unconscionable advantage.

If the allegation is, however, proven to be malicious or vexatious, the same may be considered a form of misconduct depending on the circumstances of the case.

Integrity in Our Business Conduct

Integrity is at the core of what we do, we do not tolerate any form of unlawful activity and will not allow any personal interest to affect our business decisions. The Bank prohibits any dishonest, fraudulent, or unethical behavior that undermines our reputation or materially affect its interest. No matter where you are, you should always be mindful of the Bank’s laws and regulations.

Anti-Bribery and Corruption

At all times, we prohibit corruption, bribery, and other such behaviour. The employee shall neither directly nor indirectly offer, give, promise, or authorize the payment of anything of value to, or solicit, accept anything of value from, any person, entity or organization, including but limited to a client, business partners, government official, political party, international association etc., in order to improperly obtain or retain business or a business advantage.

Under no circumstances will we approve any irregular payment or payment in kind (such as gifts or favours) to win business, encourage others to act improperly, or influence a decision in our favour. An employee who gives or takes bribes or engages in any other form of corruption, will face disciplinary action and, if appropriate, criminal proceedings.

Anti- Money Laundering

For a financial institution, complying with the Anti-Money Laundering Act of 2001 (AMLA) is the responsibility of everyone. As such, the Bank has developed sound risk management policies and practices to ensure that risks associated with Money Laundering (ML), Terrorist Financing (TF), and Sanctions violations such as reputational, operational, and compliance risks are identified, assessed, monitored, mitigated, and controlled. The Bank has also ensured effective implementation of relevant regulations to combat ML/TF, to the end that the Bank will not be used as a conduit to legitimize proceeds of unlawful activities or to facilitate financial terrorism. Any deliberate violation against the AMLA by any employee constitutes a serious offense.

Customer Service



As a leader in digital banking, the Bank strives to meet the demands of the market by providing competitive customer service experience and quality interactions with our customers. Customer Service is one of the Bank's mediums in bridging our business and customers, where trust and transparency is built, and brand loyalty is nurtured.

Therefore, employees, including the Board of Directors and Senior Management, are responsible for placing customer service at the heart of our business and strategies.

Fair Treatment

Fair treatment ensures that financial customers are treated fairly, honestly, professionally and are not sold inappropriate and harmful financial products and services. The Bank ensures that the necessary resources and procedures are in place, including internal monitoring, and control mechanisms, for safeguarding the best interest of their customers.

The minimum standards to ensure that customers are treated fairly are the following:

- Communications are fair and not misleading.
- Ensure that customers are given clear and concise information, including the risks involved, before they enter into financial products and services.
- Employees should only market and sell products and services, which have been approved for sale.
- Products and services are suitable and appropriate, taking into account the needs of the customers, their financial and risk profile and objectives.
- Complaints should be handled in a prompt, friendly, fair and effective manner.

Conflict of Interest

GoTyme Bank has chosen to set an example regarding the conduct of its employees. This position is imposed by its commitment to the general good and its constant concern to maintain its image and reputation. All employees, officers, and directors of GoTyme Bank are expected to abide with the highest standards of personal and professional integrity. That integrity must never be compromised even for purported benefit of GoTyme Bank, and most especially for individual, personal benefit.

Each employee should ensure that their individual, personal interests, and that of their related parties do not conflict with the duties which they must perform for GoTyme Bank neither with the duties which GoTyme Bank performs for its customers.

As a rule, employees should not transact business, on behalf of GoTyme Bank, with customers and/or entities in which they or their related parties are connected.

Data Protection

The Bank shares the commitment of every institution to protect the fundamental human right of privacy while ensuring the free flow of information to promote innovation and growth. It is of the utmost importance to ensure that personal information is secured and protected especially in today's society where information and communications technology are necessary in our day-to-day activities.



Employees, officers, and directors are expected to act in accordance with the highest standards of personal and professional integrity, particularly in the aspect of data protection. That integrity must never be compromised even for purported benefit of GoTyme Bank, and most especially for individual, personal benefit. As a financial services provider, GoTyme Bank also has a fiduciary responsibility to its customers in matters relating to data protection.

Information Security

We deal with confidential and sensitive information of our clients in our daily operations. We are responsible for protecting this information, which we have access to, and be alert with any instances of an unsolicited approach or misuse of confidential information.

Use of confidential information must comply with our policy and the law. Any violations or breach, whether intentional or inadvertent, should be reported to GoTyme Bank.

Media Contact and the Use of Social Media

Only authorized individuals or parties shall be allowed to contact or talk to any representative of the media (print, broadcast, wires, and online) on all GoTyme Bank matters. All inquiries or contacts made by the media should be referred to the Marketing department.

Similarly, the unauthorized creation of unofficial social media account bearing the any of the GoTyme Bank brand or corporate name is not allowed, unless otherwise approved by Marketing and Compliance departments.

Attendance Notification

GoTyme Bank Employees are expected to be performing their duties within the official work hours,

Failure to provide proper notification, verification, or updates on absences, frequent tardiness, and the like, may result in disciplinary action up to and including termination of employment.

Other Specific Requirements of the Law

As and when specific laws or regulations are published and implemented, all concerned parties shall ensure that their individual responsibilities are complied with. These laws, among others, include the Bank Secrecy Act, Anti-Money Laundering Act, Consumer Protection Act, and the Data Privacy Act.