

NCB FINANCIAL GROUP LIMITED

NAME OF POLICY	Corporate Social Responsibility Policy
APPROVED BY	Board of Directors
DATE	November 5, 2020
ORIGINAL APPROVAL DATE	
REVIEW DATE(S)	

1. POLICY STATEMENT

The well-being of people and society is generally recognised to be the goal of sustainable economic growth. Corporate Social Responsibility (CSR) aims to improve the quality of life of the communities around us. Corporate citizenship is that concept which balances this responsibly with the right to operate freely; continuing good citizenship is essential to the long-term viability of a business.

NCB Financial Group Limited is committed to engaging in those actions that will ensure its continued viability while recognising its role as a corporate leader in the Caribbean. We continue to engage in activities that will enable us to positively impact our stakeholders.

The core principles mentioned in this Corporate Social Responsibility Policy represent the primary beliefs on which the operations of the Group are established. It is intended that these principles will provide a framework for both managing reputational risk and maintaining NCBFG's position as a good corporate citizen while facilitating the setting of goals to achieve continuous improvements.

2. REVIEW AND UPDATE OF THE POLICY

This policy shall be reviewed at least every three years by the Board of Directors.

The Group Marketing, Communications, Analysis and Digitisation Division is responsible for undertaking the technical review of this policy and any associated company policies and submitting it to the Corporate Governance & Nomination Committee for a recommendation for approval by the Board of Directors.



Nadeen Matthews Blair

Chief Digital and Marketing Officer – NCB & C.E.O. of the N.C.B. Foundation

NCB Financial Group Corporate Social Responsibility (CSR) Policy

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1.0 Foreword

The NCB Financial Group (“NCBFG”) is one of the Caribbean’s leading financial services groups – the parent company of National Commercial Bank Jamaica Limited (“NCB”), as well as a controlling shareholder of the Trinidad-and-Tobago-based Guardian Holdings Limited (“GHL”) and Bermuda-based Clarien Group Limited.

With aspirations of becoming a pan-Caribbean financial ecosystem in the short term, NCBFG has adopted a Corporate Social Responsibility Policy, with oversight for all its subsidiaries operating in various territories across the region. While the GHL and Clarien subsidiaries are accountable to their individual and localised Corporate Social Responsibility (CSR) policies, they are also ultimately governed by the principles outlined in this policy.

NCBFG believes that a commitment to the principles of CSR not only complements our core business strategy, but also supports the key corporate values of our brand.

For the purpose of this policy, CSR will be defined as a self-regulating business model that helps a company to be socially accountable – to itself, its stakeholders and the public. By practising CSR, companies like NCBFG can consciously manage the impact they have on all aspects of society, including economic, social and environmental.

2.0 Objectives

NCBFG's CSR Policy is grounded in the following objectives:

- Ensure that NCBFG will enjoy long-term success providing appropriate benefits for employees, investors, consumers, our communities and other stakeholders;
- Comply with, and exceed where practicable, all applicable legislations, rules and regulations for operating our business in the respective territories;
- Drive competitive performance and profitability through responsible and ethical business practices
- Review, report annually and strive to continually improve our CSR performance, while evolving our approach based on the lessons learnt along the way

3.0 NCBFG's CSR Standards – Areas of Focus

To help define NCBFG's CSR Policy, we have divided it into six key areas:

- Inspired People
- Doing Good Business
- Creating Delighted, Lifelong Customers
- Data Security
- Community Development
- Environmental Sustainability

3.1 Inspired People

We strive to ensure that our team members enjoy their work, and have room to grow and excel professionally. To this end, we continually invest in our world-class training and leadership development programmes right across the Group, and actively seek/create opportunities to promote and increase the holistic development of our workforce. In addition, we provide our employees with a comprehensive suite of benefits, and give them the tools needed to serve and delight our customers. We continue, also, to ensure that we cultivate favourable working conditions for our team members, and treat them with full respect and dignity. Our employees are recognised as valid partners with the right to fair labour practices, competitive wages and benefits as well as a safe, harassment free, family-friendly work environment. Ultimately, we aim to become the region's Employer of Choice.

To achieve this, we commit to:

- i. Adopting an equal opportunity policy in the recruitment and engagement of staff, as well as during the course of their employment. These values will be applied irrespective of race, geographic location, colour, gender, religion, disability, sexual orientation or other affiliation;

- ii. Communicating the NCBFG Corporate Social Responsibility Policy, Goals and Objectives to all employees;
- iii. Promoting the best use of our human capital on the basis of matching individual skills, competencies and experience against those required for the work to be performed;
- iv. Encouraging the involvement of our employees in the planning and direction of their work. These values will be applied irrespective of location, race, colour, gender, religion, disability, sexual orientation or other affiliation;
- v. Meeting the legal requirements aimed at providing a healthy and secure working environment for all employees at all locations in all the countries in which we operate;
- vi. Encouraging all our employees to be involved in their communities as part of NCBFG's social mission to make the areas in which we operate better places to live, work and conduct business;
- vii. Offering a remuneration policy that is competitive, and recognises and rewards good performance;
- viii. Ensuring that all employees know what is expected of them in their job, and are able to measure their performance against predetermined targets;
- ix. Developing policies that promote and support employees in balancing their work and domestic responsibilities.

3.2 Doing Good Business

NCBFG will conduct its business with the highest levels of integrity, honesty and good faith; free from fraud or deception by respecting the dignity and rights of individuals in the communities and countries in which we operate, and operating in accordance with all applicable legislations, rules and regulations.

To achieve this, we commit to:

- i. Respecting the rule of law, and complying with all applicable laws and regulations of the countries in which we operate, including in particular any regulations, codes, guidelines or the like, which apply to our specific areas of business;
- ii. Only making commitments we intend to keep, not knowingly mislead others, and not knowingly participate in or condone corruption;
- iii. Not giving or accepting bribes or other inducements to obtain or retain business, nor conducting ourselves in such a way as to give rise to any inappropriate conflict of interest;
- iv. Ensuring that we do not enter into contractual arrangements that we are unable to execute;
- v. Maintaining transparency with our shareholders by ensuring timely reporting on policies, fees, rates, financial performance and any other matters which impact them directly, or indirectly.

- vi. Using company assets solely for the furtherance of the business, and not abusing positions in the Group for personal gain.

3.3 Creating Delighted, Lifelong Customers

As one of the region's leading financial services provider with a wide range of solutions for all stages of our customers' personal and business life cycles, NCB aims to win and retain customers by developing and providing world-class products and services while leveraging the strength of the Group to provide customers with competitive, value-added offerings. In addition to our strong and diverse product portfolio, NCBFG – through its subsidiaries—will drive financial literacy among its collective customer base.

To achieve this, we commit to:

- i. Ensuring that the products and services provided by our business are world-class and in accordance with aspirational standards, and should enhance the financial well-being of our customers;
- ii. Developing and maximising our use of, and accessibility to technology for the benefit of our customers;
- iii. Ensuring that the quality of our products and services satisfies/exceeds the requirements stipulated by the appropriate regulatory bodies as well as all legal requirements;
- iv. Competing fairly, ethically and within the framework of applicable competition laws and best practices;
- v. Investing in and implementing education programmes geared at increasing the financial literacy of our customers, and ensuring that they understand how the products/services they are buying/investing in operate;
- vi. Delivering a customer experience that is simple, convenient, warm and memorable for customers, regardless of the channel through which they access or utilise our products and services.

3.4 Data Security

As we aim to become digital to the core, and increase our technology-based operations and offerings, data security becomes paramount to the organisation. Protecting the privacy of our customers', employees' and suppliers' data is critical to maintaining their trust, and to this end, we make every effort and precaution to safeguard their sensitive information. In our line of business, we understand the risks related to information security, and how these affect our business operations and business continuity and therefore commit to ensuring that the maximum efforts are expended on Data Security right across the business.

To achieve this, we commit to:

- i. Ensuring that any personal/sensitive data collected shall be used, stored and otherwise processed within the framework of responsible, efficient and effective business management;
- ii. Managing our customers' and employees' data in accordance with all applicable regulatory standards, and principles outlined by governing bodies;

3.5 Community Development

Nation-building and community development is at the core of what we do. As one of the region's leading financial services groups, we recognise that we play an important role in our local communities, and we aspire to help improving our local communities in which our customers live, work and do business. We encourage and empower our employees to volunteer and get involved with their local communities, and utilise their skills and resources to improve conditions to create mutually beneficial environments.

It is our intention that the communities in which we operate regionally should benefit directly from our presence through wealth and job creation and investment of time and resources in initiatives geared at nation-building, particularly where they involve education, skills acquisition, sustainable development and the building of self-reliance.

To achieve this, we commit to:

- i. Forging relationships with those charitable organisations whose objectives are in alignment with the general nature of the Group's activities, values and image ensuring protection and strengthening of our brand;
- ii. Empowering our employees to become more involved in their communities and providing incentives via a volunteerism scheme;
- iii. Providing our employees with the opportunity to engage in activities that will benefit the community.

3.6 Environmental Sustainability

We recognise that the health and longevity of our business is directly connected to the health of the environment in which we operate. Therefore, we are focused on seeking environmental solutions with minimal footprint, while putting processes in place to prevent, reduce and mitigate any negative impact on the environment.

To achieve this, we commit to:

- i. Seeking to integrate the identification and management of environmental issues in our everyday business practices;

- ii. Giving full consideration to the management of our key environmental impacts;
- iii. Meeting the relevant legal requirements on environmental issues to ensure that any adverse effects on the environment are prevented or minimised;
- iv. Ensuring that all our employees are aware of our environmental practices and inform them of their individual roles and responsibilities towards the environment. All employees will be encouraged to consider environmental issues as a part of their roles;
- v. Ensuring in the selection of key suppliers that we consider their approach to the environment and ask them to comply with the applicable environmental laws. We will not knowingly conduct business with those companies that fail to demonstrate respect for the environment;
- vi. Reviewing (periodically, or at least annually) the environmental initiatives throughout the Group, and, if required, update the practices and set goals for the future.
- vii. Striving to ensure that environmental improvements go hand-in-hand with reduced costs and increased efficiency;
- viii. Where appropriate, using our position as a financial institution/organisation to promote good environmental practice through our products and services.

4.0 Stakeholders

Our efforts and resources will be focused on those areas where we can make the most significant impact. Consequently, we commit to becoming:

- i. The preferred choice for all financial services to **our customers**
- ii. The employer of choice for **our existing employees and potential talent**
- iii. A responsible corporate citizen in **our communities**
- iv. A top-tier performer to **our investors/shareholders**
- v. Practitioners of excellent corporate governance to **the government/regulators** in the territories in which we operate
- vi. A communication facilitator to **the media**
- vii. A fair and beneficial business partner to **our suppliers**

Our Group and its subsidiaries will engage these various stakeholder groups through communication and consistent dialogue, and stakeholder relationships will be conducted with integrity, fairness and confidentiality. We will operate in accordance with our risk management framework, enforce regulatory compliance and seek mutually beneficial relationships with third parties with which we conduct business.

To achieve this, we commit to:

- i. Preparing detailed financial plans and setting clear performance targets;
- ii. Establishing detailed financial procedures, including the authorisation of revenue and capital expenditure;

- iii. Maintaining a comprehensive system of internal audit with efficient control processes;
- iv. Producing financial reports that adequately reflect and record all transactions that have been undertaken;
- v. Ensuring that all proposed investments are fully evaluated and approved at the appropriate level and monitoring ongoing performance against expectations;
- vi. Taking prudent decisions on tax, finance and accounting issues to optimise the Group's position.
- vii. Preparing detailed financial statements and reporting on the Company's consolidated performance.

5.0 Implementation and Monitoring

The Group Marketing, Communication, Analysis and Digitisation Division has responsibility for the processes and procedures to monitor and control the implementation of this Policy and will report publicly on our CSR activities, and achievement of the respective targets/key performance indicators. This policy will be reviewed at least every three years, and updated as necessary to reflect any significant developments in our business, and global best practices.