

Code of Conduct

Manual

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Introduction

One of the core values of Bank of Beirut (BoB) is that we conduct our business consistent with all applicable laws and regulations, and are honest in our dealings with stakeholders (customers, employees, shareholders, partners, suppliers), and competitors.

Consistent with these values, the objective of promulgating this Code of Conduct (Code) is to maintain and further promote ethical conduct, and compliance with applicable laws and regulations, policies and procedures, in accordance with the highest standards of professional integrity.

This Code has been adopted by BoB to set forth the general principles and standards to which its management, officers, and employees are expected to adhere. The purpose of the Code is to articulate the ethical framework within which BoB operates and to place employees on notice that they will be held responsible for abiding by the articulated standards, including applicable laws. They are also expected to conduct themselves in order to protect and promote organization-wide integrity and to enhance the Bank's ability to achieve its mission.

Compliance with the Code

The Code is to be distributed to all the BoB officers, management and employees, who shall sign an acknowledgement that they have received, read and understood all of the standards contained herein.

This code is the framework for the Bank's Compliance Program and the written policies and procedures that are maintained by each operational department.

Each BoB manager and supervisor is responsible for ensuring that all employees under their supervision understand the standards of conduct contained herein and comply with them, as well as with all job-specific policies and procedures. As used herein, "Bank of Beirut personnel" includes all BoB officers, directors, and employees.

Also, managers have a responsibility to lead by example. Managers must be positive role models to inspire others to follow Code and to conduct business according to the highest standards of ethics and professional behavior.

BoB expects all personnel to act in full compliance with the principles set forth in this Code and in a manner consistent with the highest ethical standards. Failure to observe these principles may result in disciplinary action, up to and including termination of employment. Furthermore, violation of this Code may also be violation of the law and may result in civil or criminal penalties for any staff, supervisor, manager, and/or as a result to the Bank.

The personnel conduct and behavior, whether during work or outside it, and the impact of such conduct onto the Bank's reputation, interests, employees and clients, is one of the basic criteria that the management takes into consideration in the promotion process, or in determining those deserving benefits and remunerations, or upon imposing penalties.

Updating the Code

This Code is only a summary of the main rules, principles, and regulations that apply to BoB activities. Questions about anything in this Code should be referred to the Compliance Department or to the Human Resources Department.

The Code will be updated from time to time. New addition/amendments will be communicated to all staff either through internal memos, e-mails, intranet, or any other mean. It is the responsibility of all staff members to be aware of the current rules and procedures applicable to their business units.

Reporting Actual and Potential Violations

All BoB personnel are required to report fraud or attempted fraud, possible violation of a law, regulation or any policy and procedure, and most importantly any unusual transaction that does not match the customer's profile. It also applies if you are being asked to do something that is improper or illegal.

If you raise an ethical issue or violation to your supervisor and you do not believe the issue has been addressed, you should raise it directly to the Internal Audit and Compliance Department or to the Human Resources Department.

BoB management strongly encourages personnel to report, in good faith, possible ethical issues, violations of rules, laws and regulations, and prohibits any retaliatory action against any individual for raising legitimate concerns or questions regarding ethical matters or for reporting actual or suspected violations.

Principle 1 – General Principles

1.1. Professionalism

Staff members are expected to act in a professional, diligent and loyal manner towards other members of their team as well as towards the Bank and its clients, in accordance with laws and regulations in force. All staffs are entitled to a safe working environment that is inclusive and free from discrimination, bullying and harassment.

1.2. Client's Best Interest

Staff members should give priority to serving the interests of BoB clients, without giving unfair preference to any individual or group of individuals. They must ensure that BoB clients are adequately informed of, and understand, the risks they may incur by entering into proposed transactions especially if they do not have extensive experience in dealing with such transactions. The product should also be suitable for, and meet the specific requirements of each customer.

1.3. Avoid Conflict of Interest

Staff should avoid situations generating conflicts of interest in which the Bank or one of its staff members could be suspected of not acting in an entirely independent manner. Conflicts of interest must be resolved fairly and with the utmost neutrality so as never to place clients at a disadvantage position. Staff should take care not to generate conflicts of interest between their professional and their outside activities. Also, staffs are not allowed to exercise any outside activity prior to obtaining management authorization.

1.4. Banking and Professional Secrecy

Staff should comply with the principle of banking and professional secrecy and respect the obligation of discretion in order to protect business confidentiality and abide by applicable laws and regulations. The circulation of confidential information should be limited to staff members on a need-to-know basis.

1.5. Compliance with Regulatory Requirements

To meet legal and compliance obligations, staff should scrupulously comply with the letter and spirit of the rules and regulations of the markets in which they operate and refrain from conducting any transaction that may violate laws and regulations. The Bank will strive to ensure that all activity by or on behalf the Bank is in compliance with all applicable laws and regulations in the jurisdictions where BoB has physical presence, as well as in any other jurisdiction that might be affected.

1.6. Fraud, Money Laundering, and Terrorism Financing Prevention

Staff members should act to prevent corruption, fraud, money laundering, and financing of terrorism. Client relations should be based on an in-depth understanding of a client's background starting with full identification, and awareness of its activities. Employees must comply with relevant laws and regulations, and with the bank's AML/CFT Compliance policy.

Those who suspect money laundering, or who are faced with questionable or irregular activities, must report their suspicions immediately to the Compliance Department.

Principle 2 - Business Ethics

In furtherance of BoB commitment to the highest standards of business ethics and integrity, employees will accurately and honestly represent the Bank and will not engage in any activity or scheme intended to defraud anyone of money, property, or honest services.

The Standards set forth below are designed to provide guidance to ensure that the Bank business activities reflect the high standards of business ethics and integrity.

2.1. Honest Communication

BoB requires candor and honesty from individuals in the performance of their responsibilities and in all communications. The Bank will strive to provide timely and accurate information to customers. No

employee shall make false or misleading statements to any customer, person or entity doing business with the Bank about other customers, persons or entities doing business or competing with the Bank, or about the products or services of the Bank or its competitors.

2.2. Marketing, Advertising and Media Interviews

The Bank will use marketing and advertising to educate its customers and prospective customers about its services and to encourage business growth and development. We will present to the best of our ability and knowledge truthful, informative and accurate information in all advertising and marketing and, where necessary, submit advertising and marketing materials for regulatory review.

Employees must get approval from senior management before publishing any material e.g. articles, making speeches, giving interviews or making public appearances connected to the Bank or its business interests or employee's position with the Bank.

2.3. Social Media

When using social media, whether for personal or permitted business reasons and whether during or outside of work, staff must follow the general principles below:

- Never act as an unauthorized spokesperson for Bank of Beirut;
- Never discuss or disclose any confidential financial information or other non-public proprietary company information or any confidential information regarding the bank's clients, shareholders, vendors, suppliers or business partners.

2.4. Misappropriation of Proprietary Information

BoB personnel shall not misappropriate confidential or proprietary information belonging to another person or entity, nor utilize any publication, electronic data, document, computer program, information, or product in violation of the Bank's or a third party's interest in such product. All BoB personnel should ensure that they do not improperly copy for their own use documents or computer programs in violation of applicable copyright laws or licensing agreements. BoB personnel shall not utilize confidential business information obtained from competitors, including customer lists, interest rates, contracts, or other information likely to provide an unfair competitive advantage to BoB. It is not acceptable for the BoB personnel to obtain confidential information about a competitor by unlawful means or when doing so would violate a contractual obligation.

2.5. Employee Conduct

Gambling and Lotteries

Gambling activities for money or anything of value are absolutely prohibited. In addition, recurring attendance to un-respectful clubs is discouraged. An employee shall not participate in any excessive lottery activity.

Alcoholic Beverages

The Bank prohibits the sale or consumption of alcoholic beverages by anyone on the Bank's premises. The Bank prohibits an employee from reporting to work or performing job duties if, as a result of consuming alcoholic beverages, the employee is under the influence of alcohol.

Illegal Drugs

An employee shall not possess, use, sell, distribute any drug or any unauthorized substance.

Firearms/Hazardous Materials

The possession or use of firearms or other lethal weapons, explosives or hazardous materials by an employee on Bank premises is prohibited. This restriction does not apply to items that are owned by the Bank for security reasons and used by a Bank authorized employee in the conduct of Bank business.

Bribes and Kickbacks

Directors, officers and employees should not give, solicit or receive bribes or kickbacks.

Insider Trading

Directors, officers and employees should not be engaged in or support insider trading activities. The misuse of inside information undermines the financial system and unfairly disadvantages others in the market.

Illegal Activity

Officers or employees engaged in activities found to be in conflict with and against laws, regulations, or guidelines will be subject to termination of employment. Examples of illegal activity include, but are not limited to:

1. Embezzlement
2. Frauds such as forgery, counterfeiting, and check kiting
3. Unauthorized use of funds, revenues and fees
4. Abuse of expense, asset, and liability accounts
5. Attempting to cover up defective work without reporting mistakes to your Manager or Supervisor.
6. Fighting or engaging in any form of harassment, including sexual harassment
7. Bribery and Corruption

In addition, any director, officer, or employee who is charged with, or is entering into a pretrial diversion or similar program for any crime involving breach of trust, dishonesty, money laundering, a drug-related offense, a crime of violence, or a felony must immediately notify the Head of Human Resources with a copy to the Head of Compliance.

Political Activities

No corporate funds are to be used for political contributions. Any officer, employee or director participating in political activities does so as an individual and not as a representative of the Bank. To avoid any possible conclusion of corporate or affiliate Bank sponsorship or endorsement, the corporate name or address should not be used in mailed material, fund collection, nor be identified in any advertisement or literature, unless specifically approved in advance and in writing by the Chairman – General Manager.

Also, the Bank's premises should not be used to support any political party, neither by discussion of political matters which may create a conflict between employees themselves or between employees and customers, nor by displaying political materials favoring political parties.

Principle 3 – Confidentiality

BoB shall strive to maintain the confidentiality of customer information, proprietary information, and other confidential information in accordance with applicable legal and ethical standards.

BoB personnel are in possession of and have access to a broad variety of confidential, sensitive, and proprietary information, the inappropriate release of which could be injurious to the Bank's customers and to the Bank itself. BoB has an obligation to actively protect and safeguard confidential, sensitive, and proprietary information in a manner designed to prevent the unauthorized disclosure of information.

Customer information and proprietary information is considered as “non-public” and should never be accessed for other than business reasons. Employees must protect the confidentiality of “non-public” information they obtain in connection with their employment while working with BoB, and after they cease their employment with the Bank.

3.1. Customer Information

BoB is entrusted with important information about its customers. This information is vital to our ability to provide quality products and services. It includes personal data, information about a client's plans (merger, increase of capital, etc.), and any other information that could be deemed material to our clients.

It is our responsibility to safeguard any information shared by our customers with us, in accordance with the strict standards of security and confidentiality. Employees shall refrain from revealing any personal or confidential information concerning customers unless permitted by law or authorized by customer. If questions arise regarding an obligation to maintain the confidentiality of information or the appropriateness of releasing information, employees should refer to the Compliance Department or seek guidance from management/Legal Department.

3.2. Proprietary Information

Information, ideas, systems, products, earnings projections, and other assets of BoB are important to the Bank's success. Information pertaining to BoB competitive position or business strategies, and information relating to negotiations with employees or third parties should be protected and shared only with employees having a need to know such information in order to perform their job responsibilities. Employees should exercise care to ensure that this information is carefully maintained and managed to preserve and protect its value.

3.3. Personnel Information

Personnel files, payroll information, disciplinary matters, and similar information shall be maintained in a manner designed to ensure confidentiality in accordance with the Bank's policies and procedures. Employees should exercise due care to prevent the release or sharing of information beyond those persons who may need such information to fulfill their job function on a need-to-know basis.

3.4. Guidelines to Maintain Confidentiality

Discussions of work in the presence of third parties whether outside the Bank or even in another department inside the Bank could lead to inadvertent disclosure of confidential information.

- Do not discuss confidential matters in lifts, corridors, or other shared facilities in BoB building;
- Avoid discussing confidential matters in public places such as taxis, restaurants, and other public places;
- If it is necessary to discuss office matters in public place, care should be taken to avoid mentioning any customer's name or other details which might reveal a client's identity or information about a particular transaction;
- Do not leave confidential documents lying unattended on your desk, particularly overnight or at lunch time;
- Preliminary draft documents not being retained should be placed in paper shredders;
- In the case of potentially sensitive transactions such as mergers and acquisitions, bid financings or unusually large financing commitments that have not been publicly disclosed, it is particularly important to take special precautions, which should include:
 - o Limiting the number of people with access to, and knowledge of, confidential information to an absolute minimum;
 - o Using code names or omitting the names and other identifying details from drafts and final versions of documents.

3.5. Chinese Walls

“Chinese Walls” are information barriers implemented within firms to separate and isolate persons who make investment decisions from persons who are privy to undisclosed material information which may influence those decisions.

In addition to the general principles regarding confidentiality and the passing of confidential information outside the Bank, there are also important procedures governing the passing of information within BoB. These are often referred to as Chinese Walls which require sensitive information obtained by persons employed in one part of BoB to be withheld from persons in another part of the Bank.

Ordinary customer information should only be passed to another BoB employee, even in the same BoB group, on a need to know basis. On the other hand, other sensitive information is subject to significantly greater control. Such information must only be used for legitimate business purpose for which it was given, and must not under any circumstances be passed to anyone inside or outside BoB not directly concerned with that specific information nor retained.

Principle 4 - Conflicts of Interest

Senior Management, officers, committee members and key employees owe a duty of undivided and unqualified loyalty to the Bank. Persons holding such positions may not use their positions to profit personally or to assist others in profiting in any way at the expense of the Bank.

All BoB personnel are expected to regulate their activities so as to avoid actual impropriety or the appearance of impropriety that might arise from the influence of those activities on business decisions of the Bank, or from disclosure or private use of business affairs or plans of the Bank. In connection with this Principle 4, any conflicts of interest must be disclosed.

4.1. Outside Financial Interests

While not all-inclusive, the following will serve as a guide to the types of activities by BoB personnel, or a family member of such person, that might cause conflicts of interest:

- Ownership in, management control or employment by any outside concern that does business with BoB. This does not apply to stock or other investments held in a publicly held corporation, provided the values of the stock or other investments are not significant. BoB may, following a review of the relevant facts, permit ownership interests if management concludes that such ownership interests will not adversely impact the Bank’s business interest or the judgment of the covered person;
- Representation of BoB by BoB personnel in any transaction in which such personnel or a family member has a substantial personal interest;

- Disclosure or use of confidential, special, or inside information of or about BoB, particularly for personal profit or advantage of the Bank's personnel.

4.2. Services for Competitors and Vendors

No BoB personnel shall perform work or render services for any competitor of the Bank or for any organization with which the Bank does business or that seeks to do business with the Bank outside of the normal course of his or her employment with the Bank without the written and prior approval of the Chairman – General Manager or the Head of Human Resources (copy of approval to the Head of Group Compliance and Head of Group Internal Audit).

Nor shall any such employee be a director, officer, or consultant of such an organization, nor permit his or her name to be used in any fashion that would tend to indicate a business connection with such organization without the written and prior approval of the Chairman – General Manager or the Head of Human Resources (copy of approval to the Head of Compliance).

4.3. Participation on Boards of Directors

- BoB personnel must obtain written approval from the Chairman – General Manager prior to serving as a member of the Board of Directors of any organization whose interests may conflict with those of BoB. The Bank personnel who are asked, or seek to serve on the Board of Directors of any organization whose interest would not impact BoB (for example, civic [non-governmental], charitable, fraternal, and so forth) will not be required to obtain such approval, but he/she must disclose it;
- BoB retains the right to prohibit membership on any Board of Directors to any of its personnel if such membership might conflict with the best interests of the Bank;
- Questions regarding whether or not Board participation might present a conflict of interest should be discussed with the Chairman – General Manager.

4.4. Honoraria

BoB employees are, with the permission of their supervisors, encouraged to participate as faculty and speakers at educational programs and functions. Any honoraria or other payments shall be submitted to the Head of Human Resources for written approval.

4.5. Requirement to Avoid Conflicts of Interest

Employees should either avoid any conflict of interest or, where conflicts arise, employees should ensure fair treatment of BoB customers. This is accomplished by disclosure, internal rules of confidentiality or possibly by declining to act. In all cases, employees should not unfairly place the Bank's interests above those of the customers.

If a BoB employee is aware that a conflict of interest exists, the employee must take reasonable steps to ensure fair treatment to the customer. One way in which BoB could ensure fair treatment is to disclose the conflict, although such action would be determined by the nature of the customer relationship and thus be limited to specific circumstances. Another way in which BoB manages potential conflicts of interest is through Chinese Walls policy.

4.6. Requirement to Disclose Material Interest

If an employee is aware that BoB may have a material interest in the outcome of a transaction, other than obtaining its usual fee/commission, or that BoB has a conflict of interest in a proposed transaction, the employee should take steps to ensure fair treatment of customers. The following is some examples of what constitutes a material interest.

If BoB is writing a research report on a company and BoB has a significant trading position or a strategic shareholding interest in that company, BoB may be said to have a material interest in the publication of the report.

If a BoB employee personally is a shareholder or has some other interest in a company and a BoB customer is considering entering into a transaction with respect to that company, the Bank's employee may be deemed to have material interest in the transaction.

If a BoB employee has a material interest in relation to a proposed transaction, and if he/she is aware of such interest, the employee must take reasonable steps to ensure fair treatment to the customer involved or is part of the transaction. One way in which BoB could ensure fair treatment is to disclose the material interest.

Principle 5 - Business Relationships

Business transactions with vendors, contractors, and other third parties shall be transacted free from offers or solicitation of gifts and favors or other improper inducements in exchange for influence or assistance in a transaction.

The Standards set forth below are intended to guide key employees in determining the appropriateness of the listed activities or behaviors within the context of BoB business relationships, including relationships with vendors, providers, subcontractors and government entities. It is the intent of BoB that this policy be construed broadly to avoid even the appearance of improper activity.

If there is any doubt or concern about whether specific conduct or activities are ethical or otherwise appropriate, you should contact the Compliance Officer or a member of the Compliance Committee.

5.1. Gifts and Gratuities

It is the Bank's desire to at all times preserve and protect its reputation and to avoid the appearance of impropriety.

- Gifts from Customers: Employees are prohibited from soliciting tips, personal gratuities, or gifts from customers, and from accepting monetary tips or gratuities. Employees may accept gratuities and gifts of a nominal value (i.e., less than \$100) from customers. If a customer wishes to present a monetary gift, he or she should be referred to the employee's supervisor and/or to the Head of Human Resources.
- Gifts Influencing Decision-Making: Employees shall not accept gifts, favors, services, entertainment, or other things of value to the extent that decision-making or actions affecting BoB might be influenced. Similarly, the offer or giving of money, services, or other things of value with the expectation of influencing the judgment or decision-making process of any purchaser, supplier, customer, government official or other person by BoB is absolutely prohibited. Any such conduct must be reported immediately to the Head of Human Resources with copy to the Head of Group Compliance and Head of Group Internal Audit.
- Gifts from Existing Vendors: Employees may retain gifts from a vendor if the gifts have only a nominal value (i.e., less than \$100). If the value of the gift exceeds \$100, then the gift must be reported to the Bank's Head of Human Resources with a copy to the Head of Group Compliance and Head of Group Internal Audit. If an employee has any concern whether a gift should be accepted, the employee should consult with his or her supervisor. To the extent possible, these gifts should be shared with the employees' co-workers. Employees shall not accept excessive gifts, meals, expensive entertainment, or other offers of goods or services that have more than a nominal value, nor may they accept gifts from vendors, suppliers, contractors or other persons unless approved by the Head of Human Resources.
- Vendor-Sponsored Entertainment: At a vendor's invitation, an employee may accept meals or refreshments at the vendor's expense. Occasional attendance at a local theater or sporting event, or similar entertainment at vendor expense may also be acceptable. In most circumstances, a regular business representative of the vendor should be in attendance with the employee. Nothing in this policy shall prohibit a department manager from establishing stricter rules relating to the acceptance of gifts, gratuities, or other things of value from vendors.

5.2. Workshops, Seminars, and Training Sessions

Attendance at local, vendor-sponsored workshops, seminars, and training sessions is permitted. Attendance, at vendor expense, at out-of-town seminars, workshops, and training sessions is permitted only with the approval of an employee's supervisor and Human Resources.

5.3. Business Inducements

BoB employees shall not seek to gain any advantage through the improper use of payments, business courtesies, or other inducements. Offering, giving, soliciting, or receiving any form of bribe or other improper payment is prohibited.

In addition, authorized employees may provide gifts, entertainment and meals of nominal value to BoB customers, current and prospective business partners and other persons when such activities have a legitimate business purpose, are reasonable, and consistent with all applicable laws.

Principle 6 - Protection of the Bank's Assets

All employees will strive to preserve and protect the Bank's assets by making prudent and effective use of BoB resources and properly and accurately reporting their financial condition.

The Standards set forth below are intended to guide key employees by articulating BoB expectations as they relate to activities or behaviors that may impact the Bank's financial health or that reflect a reasonable and appropriate use of the assets.

6.1. Internal Control

BoB has established control standards and procedures to ensure that assets are protected and properly used and that all records and reports kept in the course of the Bank's business are accurate and reliable. All employees share the responsibility for maintaining and complying with required internal controls.

6.2. Financial Transactions and Reporting

All of BoB business transactions shall be carried out in accordance with management's general or specific directives. All of the Bank's books and records shall be kept in accordance with generally accepted accounting standards, except where statutory standards are applicable. All transactions and assets shall be completely and accurately recorded on the Bank's books and records on a consistent basis.

No payment shall be approved, made or requested with the intention or understanding that it will be used for any other purpose other than that described in the supporting documentation of the payment.

All financial reports, accounting records, reports, expense accounts, timesheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation, or financial reporting is contrary to the policy of BoB and may be in violation of applicable laws.

6.3. Accuracy, Retention and Disposal of Documents and Records

Employees are responsible for the integrity and accuracy of BoB documents and records, not only to comply with legal and regulatory requirements, but also to ensure that records are available to defend BoB business practices and actions. No one may alter or falsify information on any record or documents. Business records shall be maintained, retained, and destroyed in accordance with applicable law and the Bank's policies and procedures.

6.4. Communications Systems

All BoB communications systems, electronic mail, Internet access, facsimile, telephone service or voice mail are the property of the Bank and are to be used primarily for business purposes. Limited, reasonable personal use of the Bank's communications systems is permitted; however, you should assume that such communications are not private. Customers' information should not be sent by any method for which security and confidentiality cannot be ensured.

Subject to any applicable laws and the Bank's policies and procedures, BoB reserves the right to periodically access, monitor and disclose the contents of its communications systems. BoB employees may not use the Bank's communications systems or access to the Internet at work to post, store, transmit, download, or distribute any threatening, knowingly, reckless or maliciously false, or obscene materials.

Additionally, BoB communications systems may not be used to send chain letters, personal broadcast messages or copyrighted materials that are not authorized for reproduction. They are not to be used for job searches.

Employees who misuse the Bank's communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action in accordance with the Bank's corrective action policy, up to and including termination.

6.5. Travel and Entertainment

Travel and entertainment expenses should be consistent with the employees' job responsibility and the organization's needs and resources. It is the Bank's policy that an employee should not suffer a financial loss or a financial gain as a result of business travel and entertainment. Employees are expected to exercise reasonable judgment in the use of BoB assets and to spend the Bank's assets as carefully as they would spend their own.

6.6. Use of Corporate Assets

All employees are expected to refrain from converting BoB assets to personal use. All property and business of the Bank shall be conducted in the manner designed to further BoB interest rather than the personal interest of an individual employee. Employees are prohibited from the unauthorized use or taking of the Bank's equipment, supplies, materials or services. Prior to engaging in any activity on BoB time that will result in remuneration to the employee or the use of the Bank's equipment, supplies, materials, or services for personal or non-work-related purposes, employees shall obtain the approval of the Head of Human Resources (with a copy of approval to the Head of Group Compliance and Head of Group Internal Audit).

6.7. Respect the Community and the Environment

The Bank's staff members have a responsibility of reducing the effect of our operations on the environment by managing the resources we use across our operations, raising staff awareness about the importance of caring for the environment, and working with our clients to reduce risks. Also, all employees are expected to respect human rights impacted by our activities with employees, suppliers and clients.

Principle 7- Whistleblowing Policy

The Bank requires prompt reporting by employees of any alleged or suspected illegal activity or violations of this Code of Conduct. This helps to maintain a culture of strong ethics, integrity and transparency.

7.1 Reporting of Complaints

Any employee of the Bank must report any complaints or concerns regarding questionable treatment or alleged violations with respect to the present Code of Conduct or any other matters. A complaint may be submitted confidentially or anonymously to the Head of Group Internal Audit by e-mail to audit@bankofbeirut.com.lb.

If the complaint is written and sent via the mail, the employee should mark the envelope as "private and confidential." If an employee wishes to discuss the matter orally, he or she should indicate this in the submission and include a telephone number at which he or she might be contacted if deemed appropriate.

To the extent possible, any complaint should be factual rather than speculative or conclusory, and should contain as much specific information as possible to allow for proper assessment. The Complaint describing an alleged violation or concern should be candid and set forth all of the information that the employee knows regarding the allegation or concern.

7.2 Whistleblower Protection

As the Bank requires its employees to adhere to the letter and the spirit of the law; it also provides protection to those employees who aid entities in investigating violations of laws.

The Bank shall not discharge, demote, suspend, threaten, harass, or discriminate against any employee who (a) provides information during an investigation, or (b) files, testifies, participates in, or otherwise assists in a proceeding filed, that relates to a violation of any law relating to fraud, when the information is provided to; or conducted by a person with supervisory authority over the employee; or who has the authority to investigate, discover or terminate misconduct.

Any officer, director or employee responsible for reprisals against an employee for reporting good faith known or suspected violations of the code or law, will be subject to disciplinary action, up to and including discharge.

However, employees who file reports or provide evidence which they know to be false or without a reasonable belief in the truth and accuracy of such information will not be protected by the above policy statement and may be subject to disciplinary action, including termination of their employment.