

CORPORATE SOCIAL RESPONSIBILITY

National Commercial Bank Jamaica Limited (NCB) is committed to engaging in those actions that will ensure its continued viability while recognizing its role as a corporate leader in the Country.

The scope of NCB's CSR Policy includes four (4) main areas:

1. ETHICS

Ethical standards and practices are governed by the NCB Code of Business Conduct. Commitment to ethical behaviour is widely communicated in an explicit statement and rigorously upheld. NCB expects all its employees to display the attributes of decency, fairness and honesty.

2. EMPLOYMENT PRACTICES

The Company's human resource management practices promote personal and professional employee development, diversity at all levels and empowerment. Employees are recognized 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.

3. COMMUNITY OUTREACH

The Company fosters an open relationship that is sensitive to community culture and plays a proactive, co-operative and collaborative role to make the communities in which we operate better places to live and conduct business.

4. STAKEHOLDERS

Our efforts and resources will be targeted on those areas where we can make the most significant impact. Consequently, we make the following commitment:

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| 1. To our customers: | we will be the preferred choice |
| 2. To our employees: | we will be the Employer of First Choice |
| 3. In our communities: | we will be a responsible citizen |
| 4. To our investors/shareholders: | we will be a top tier performer |
| 5. To the Government/Regulators: | we will practice excellent corporate governance |
| 6. To the media: | we will be an information facilitator |
| 7. To our suppliers: | we will engage in fair business practices |

The Company will engage its various stakeholder groups through communication and dialogue and stakeholder relationships will be conducted with integrity, fairness and confidentiality.

Ethics

Business Conduct

NCB will conduct its business with integrity, honesty and in good faith; free from fraud or deception by respecting the dignity and rights of individuals in the communities and countries in which we operate. In order to achieve this, we will:

- i. Respect the rule of law and comply 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 business;

- ii. Make only commitments we intend to keep, not knowingly mislead others and not knowingly participate in or condone corruption;
- iii. Not give or receive bribes or other inducements to obtain or retain business, nor conduct ourselves in such a way as to give rise to any conflict of interest;
- iv. Seek mutually beneficial commercial relationships with third parties with whom we conduct business;
- v. Ensure that we do not enter into contractual arrangements that we are unable to execute;
- vi. Use company assets solely for the furtherance of the business and not abuse our positions in the Company for personal gain.

Conduct with our Customers

NCB aims to win and retain customers by developing and providing products and services of high quality. To achieve this we will:

- i. Ensure that all products and services associated with our businesses are of a strict quality that accords with and/or enhances our market positions;
- ii. Develop and maximise our use of and accessibility to technology for the benefit of our customers;
- iii. Ensure 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. Compete fairly, ethically and within the framework of applicable competition laws.

Employment Practices

NCB recognizes that competitive advantage and commercial success depend on the full commitment of its employees and is dedicated to respecting their human rights and dignity and to providing them with favorable working conditions. We will:

- i. Adopt 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. Communicate the Corporate Social Responsibility Policy, Goals and Objectives to ALL employees during orientation;
- iii. Promote 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. Encourage 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. Meet 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. Encourage all our employees to be involved in their communities as part of NCB's social mission to make the areas in which we operate better places to live, work and conduct business;
- vii. Offer a remuneration policy that is competitive and that recognizes and rewards good performance;
- viii. Ensure that all employees know what is expected of them in their job, and are able to measure their performance against predetermined targets;
- ix. Develop policies that promote and support employees in balancing their work and domestic responsibilities.

Community Outreach

It is our intention that the communities in which we operate should benefit directly from our presence through wealth and job creation and investment of time and resources in initiatives geared towards nation building where these involve but are not limited to education, skills acquisition, sustainable development and the building of self reliance. We will respond in a timely and appropriate manner to requests for

outreach assistance in our communities. We believe that involvement in = social issues will foster partnerships that benefit both the community and the Company.

Social Partnerships

NCB has set clear parameters with regards to the charities that it will support favoring projects and causes reflective of our corporate values and priorities. We will accomplish this by:

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

Environmental Impact

As a leading financial institution, we recognize our role in managing the impact of our actions on our environment and our responsibility to communicate and demonstrate good environmental practices inside and outside of the Company. We will:

- i. Seek to integrate the identification and management of environmental issues in our everyday business practices;
- ii. Give full consideration to the management of our key environmental impacts;
- iii. Meet the relevant legal requirements on environmental issues to ensure that any adverse effects on the environment are prevented or minimized;
- iv. Ensure 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. Ensure 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. Review (periodically or at least annually) the environmental initiatives throughout the Company and, if required, will both update environmental practices and set goals for the future;
- vii. Strive to ensure that environmental improvements go hand-in-hand with reduced costs and increased efficiency;
- viii. Where appropriate, use our position as a financial institution/organisation to promote good environmental practice through our products and services.

Stakeholders

To enable NCB to achieve its objective of maximizing shareholder value, we must ensure the highest possible standards of financial management, assessment of risk and control. Across the enterprise, we will accomplish this by:

- i. Preparing detailed financial plans and setting clear performance targets;
- ii. Establishing detailed financial procedures, including the authorization 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 monitor ongoing performance against expectations;
- vi. Taking prudent decisions on tax, finance and accounting issues to optimize the Company's position.
- vii. Preparing detailed financial statements and reporting on the Company's consolidated performance.