



JSFB Compliance and Ethics Policy

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Commissioned by: Chief Compliance & Human Resources Officer

Document Version Control

Version	Date	Document by	Reviewed by	Remarks
1.0	08-Feb-18		Sumit Sharma	➤ One single document split into 7 policies under Compliance and Ethics Policy
1.1	08-Aug-18	Namrata Savor	Ravi Duvvuru	<p>Jana Compliance and Ethics Committee (CEC)</p> <p>Clause 4: The CEC will hold umbrella accountability for all frauds, offences and breaches under the policies mentioned above. The final disciplinary action relating to all cases covered by the various policies will be decided by the CEC. The CEC will comprise the following members or their authorized representatives:</p> <ul style="list-style-type: none"> • Chief Compliance Officer (Chairperson) • Chief Human Resources Officer (Convenor) • Chief Audit Officer (Member) • Chief Financial Officer (Member) • Chief Risk Officer (Member) <p>Permanent invitees include CEO – RFS, CEO – EFS, Head – Collections and Zonal Business and HR Heads, as required. Any change in the constitution of the CEC will be approved by Jana Bank’s Management Committee (MANCO).</p>
1.2	24-October-19	Biju Thomas	Aditya Babu PVN	<p>Revised version: 1.2</p> <p>Clause 4: Jana Compliance and Ethics Committee (CEC)</p> <p>Compliance & Ethics Committee comprises of two bodies – Head Office (HO) CEC and Zonal (ZO) CEC. Depending on the nature of the case, the same will be reviewed by HO or ZO CEC</p> <p>➤ The Head Office (HO) CEC will comprise the following members or their authorized representatives:</p> <ul style="list-style-type: none"> • Chief Compliance Officer (Chairperson) • Chief Human Resources Officer (Convenor) • Chief Audit Officer (Member) • Chief Financial Officer (Member) • Chief Risk Officer (Member) <p>Permanent invitees include CEO – RFS, Head – Collections and Zonal Business and HR Heads, as required. The quorum should be 3 HO CEC members</p> <p>The Zonal CEC will comprise the following members or their authorized representatives:</p> <ul style="list-style-type: none"> • Zonal Head Human Resources (Convenor) • Zonal Heads from each vertical (members – minimum any two Zonal Heads should be present) <p>➤ The quorum should be 3 Zonal CEC members Any change in constitution of the HO or Zonal CEC will be approved by MD&CEO.</p>



Clause 5: Appeals Committee

Appeals Committee comprises of two bodies –

- HO Appeals Committee
- Zonal Appeals Committee

➤ **The HO Appeals Committee will comprise of the following members or their authorized representatives**

- Managing Director & Chief Executive Officer (MD&CEO) (Chairperson)
- Chief Operating Officer (COO) (Member)

Employees can appeal the HO CEC ruling by writing to the Appeals Committee at appeals.committee@janabank.com for cases closed in HO CEC within 15 days of receipt of the ruling.

➤ **The ZO Appeals Committee will comprise of 3 senior members as appointed by the MD & CEO.**

Current committee members include

- Chief Information Officer (CIO) (Chairperson)
- Head - Human Resources Operations (Member)
- Segment Credit Head – MSE (Member)

Employees can appeal the Zonal CEC ruling by writing to the Zonal Appeals Committee at zoappeals.committee@janabank.com for cases closed in Zonal CEC within 15 days of receipt of the ruling.

1.3	May' 2020	Biju Thomas	Aditya Babu PVN	<p>Revised version: 1.3</p> <p>1. Inclusions: 'Disclaimer'</p> <p>2. Clause 4: Jana Compliance and Ethics Committee (CEC)</p> <p>Under the Head Office (HO) CEC:</p> <ul style="list-style-type: none"> Modification in the role Chief Compliance and Human Resources Officer (CCHRO) – Chairperson Change in HO CEC structure: Member- Chief Risk Officer (CRO) role has been replaced by Head – Affordable Housing role. Additional point: The committee is expected to close the case within 21 days from the date of case allocation. Modification of the point: 'Permanent invitees include CEO – RFS, Head – Collections and Zonal Business and HR Heads, as required.' As 'Other invitees include Functional & Zonal Heads, as required.' <p>3. Clause 5: Appeals Committee</p> <p>Under the HO Appeals Committee:</p> <ul style="list-style-type: none"> Inclusion of new member : Chief Risk Officer (CRO) Additional points: The Quorum should be MD & CEO and one other member <p>Under the ZO Appeals Committee:</p> <ul style="list-style-type: none"> Change in ZO CEC structure: Segment Credit Head- MSE role has been replaced by Head- Emerging Micro, Head of Regulatory Compliance role. Additional points: <ol style="list-style-type: none"> The Quorum should be CIO and two other members The committee is expected to close the case within 15 days from the date of appeal.
1.4	Sep' 2020	Biju Thomas	Usha Sonavaria	<p>Inclusion/ exclusion of member :</p> <p>Zonal Appeals Committee:</p> <p>Inclusion of two new members:</p> <ul style="list-style-type: none"> Head - Operational Risk and Policy – Member Finance Controller – Member <p>Exclusion one existing member:</p> <ul style="list-style-type: none"> Head - Human Resources Operations – Member <p>Change in Job role of existing member: Head – Emerging Micro to Head –MHL</p>

Disclaimer:

This document and all information contained in this document is confidential and proprietary information of Jana Small Finance Bank Limited ["JSFB"]. Any unauthorised use, dissemination, modifying, copying, of the content of this document or disclosure to a third party, is strictly prohibited and will warrant disciplinary action.

The information provided in this document is purely for information dissemination regarding the JSFB's Policies. The JSFB reserves its right to amendment or determination, absolutely, of this document.

1. Purpose

The purpose of Jana Compliance and Ethics policies is to define the ambit of Jana Small Finance Bank's (Jana Bank) business practices and its legal and social responsibilities. At Jana Bank, we are committed to building a work culture that promotes fair and ethical employment practices. The policies outline employees' ethical obligations to the organization along with a clear mandate of acceptable behavior and actions.

Jana Bank has zero tolerance to fraud. Employees are encouraged to report wrongdoings to the company, including unlawful conduct, misconduct, malpractice, violation of any legal or regulatory provisions, financial mismanagement, accounting irregularities, without any fear of reprisal, discrimination or harassment of any kind.

2. Scope

The policies apply to all permanent, part-time, temporary, contract employees, the Board of Directors and stakeholders, and those acting on behalf of the organization, regardless of whether they have been engaged directly or through an agency or a contractor, and whether such employees are working for remuneration or on a voluntary basis.

They are also applicable to all third parties, such as visitors, service providers, customers, partners, suppliers and any other person authorized to be present within the premises/workplace of Jana Bank or any other associates of the organization.

3. Jana Compliance and Ethics Policies

Seven policies given below constitute the Jana Compliance and Ethics Policies:

1. Code of Conduct Policy
2. Conflict of Interest Policy
3. Whistleblower Policy
4. Anti-sexual Harassment Policy
5. Data Confidentiality and Media Policy
6. Gifts and Entertainment Policy
7. Disciplinary Action Policy

4. Jana Compliance and Ethics Committee (CEC)

Compliance & Ethics Committee comprises of two bodies – Head Office (HO) CEC and Zonal (ZO) CEC. Depending on the nature of the case, the same will be reviewed by HO or ZO CEC.

➤ **The Head Office (HO) CEC will comprise the following members or their authorized representatives:**

- Chief Compliance and Human Resources Officer (CCHRO) – **Chairperson**
- Chief Audit Officer (CAO) - **Member**
- Chief Financial Officer (CFO) - **Member**
- Head – Affordable Housing – **Member**
- Other invitees include Functional & Zonal Heads, as required.

The Quorum should be 3 HO CEC members

➤ **The Zonal CEC will comprise the following members or their authorized representatives:**

- Zonal Head Human Resources **Convenor**
- Zonal Heads from each vertical -**Members** (minimum any two Zonal Heads should be present)

The Quorum should be 3 Zonal CEC members

Any change in the constitution of the HO or Zonal CEC will be approved by MD&CEO.

The committee is expected to close the case within 21 days from the date of case allocation.

Employees can write to the following email addresses if they want to report instances covered by the policies described above:

- jana.hotline@janabank.com: For whistleblower, fraud and conflict of interest cases.
- ashc@janabank.com: For instances of sexual harassment/improper conduct.

Employees can also reach out to their functional heads or MANCO in case of concerns.

5. Appeals Committee

Appeals Committee comprises of two bodies –

- HO Appeals Committee
 - Zonal Appeals Committee
- **The HO Appeals Committee will comprise of the following members or their authorized representatives**
- Managing Director & Chief Executive Officer (MD & CEO) -**Chairperson**
 - Chief Operating Officer (COO) --**Member**
 - Chief Risk Officer (CRO) – **Member**

The Quorum should be MD & CEO and one other member

Employees can appeal the HO CEC ruling by writing to the Appeals Committee at appeals.committee@janabank.com for cases closed in HO CEC within 15 days of receipt of the ruling.

- **The ZO Appeals Committee will comprise of 4 senior members and Chairperson as appointed by the MD & CEO. Current committee members include**
- Chief Information Officer (CIO) -**Chairperson**
 - Head –MHL– **Member**
 - Head of Regulatory Compliance – **Member**
 - Head - Operational Risk and Policy – **Member**
 - Finance Controller – **Member**

The Quorum should be CIO and two other members

Employees can appeal the Zonal CEC ruling by writing to the Zonal Appeals Committee at zoappeals.committee@janabank.com for cases closed in Zonal CEC within 15 days of receipt of the ruling.

The committee is expected to close the case within 15 days from the date of appeal.
