



Anti-Bribery and Anti-Corruption Policy

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1. Introduction

“Group” or “Kina Bank” refer to all operations, branches, subsidiary companies and joint ventures where Kina Securities Limited holds the controlling interest.

1.1 Mandate

To protect Kina Bank’s reputation by ensuring there are clear and unambiguous requirements around conduct relating to bribery and corruption. Having such policies in place also significantly reduces the risk of non-compliance with relevant regulatory and governance obligations.

This Policy forms a part of Kina Bank’s Compliance Risk Management Strategy and Framework (“**CRMSF**”).

1.2 Purpose

Kina Bank is committed to conducting its business in an honest and ethical manner and in accordance with all applicable laws, rules and regulations in the jurisdictions in which it operates.

Kina Bank recognises that acts of bribery and corruption are detrimental to the growth and prosperity of individuals, organisations and overall, the communities that we serve. As a business, Kina Bank is very mindful of the consequences of bribery and corruption which may result in both financial and reputational loss and imposition of regulatory, including criminal sanctions. Kina Bank has a **zero tolerance** approach to bribery and corruption and is committed to ensuring that it fully complies with relevant global rules, sanctions and domestic laws of countries where operates.

The purpose of this *Anti-Bribery and Anti-Corruption Policy* (the “**ABC Policy**”) is to provide clarity of expectations, which helps to reinforce and strengthen the understanding of our responsibilities as well as those with whom we engage and also provide guidance in dealing with incidents or suspected incidents of bribery and corruption, should they occur. The Policy complements Kina Bank’s other related policies, in particular the *Code of Ethics and Business Conduct*, *Conflict of Interests Policy*, and *Gift and Entertainment Policy*. The policy harmonises with Kina Banks Core Values that emphasise principles of fairness, imagination, reflection, togetherness and honesty in our relationships and business dealings with both our internal and external stakeholders.

1.3 Application

This policy applies to the Board of Directors (Board), all Kina Bank employees, including Executive Management, business partners, agents and representatives (individuals and or entities doing business on behalf of Kina Bank).

Kina Bank expects all third parties, including Kina Bank’s business partners, service providers and contractors, to act with integrity and to undertake their business devoid of bribery and corruption. In addition to the above, Kina Bank will investigate reported allegations of bribery, corruption and abuse of position for personal gain, involving, or in any way connected to it. If necessary, action will be taken as a result of such investigations, including termination of relationships with third parties and reporting to relevant government authorities or regulators.

1.4 Definitions

- a) **Agent** means any individual or entity acting as a representative, paid by Kina Bank, and/or acting on Kina Bank’s behalf in negotiating with Third Parties.

- b) **Bribery** is the inducement, offering, promising, giving, receiving, or soliciting of 'something of value' to a person in a position of trust to influence that person's views or conduct or to obtain a business advantage; to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through Third Parties.
- c) **Business Advantage** means that Kina Bank is placed in a better position (financially, economically, or reputationally, or in any other way which is beneficial) either than its competitors or that it would otherwise have been had the bribery or corruption not taken place.
- d) **Business Partners** includes persons and entities doing business on behalf of Kina Bank, for instance suppliers, consultants, attorneys and external auditors.
- e) **Conflict of Interest** occurs when an individual or company or organisation has multiple interests, any of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another.
- f) **Corruption** is the misuse or illegal use of entrusted power or position for private gain or advantage.
- g) **Employee** for the purposes of this policy includes all individuals in the employ of Kina Bank and includes managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual staff and, volunteers, interns, agents, sponsors, or any other person associated with Kina Bank.
- h) **Intermediary** includes but is not limited to agents, distributors, consultants, sales representatives, implementation partners and sales partners.
- i) **Public Official** means officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions.
- j) **Something of Value** includes money, but may also include gifts, entertainment, travel expenses or expensive goods; the giving of advantages or services; or any other tangible or intangible thing that has value to the recipient.
- k) **Third Party** means any individual or entity who may be indirectly involved but is not a principal party to an arrangement, contract, deal or transaction. This may include actual and potential customers, suppliers, business contacts, intermediaries, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Bribery and Corruption may occur in various different ways, among these:

- **Cash payments** - offering or accepting cash as an inducement to perform a task whilst in an official capacity.
- **Donations and Sponsorships** - a donation is a voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made. Contributions to industry associations or fees for memberships in organisations that serve business interests are not necessarily considered as Donations. Sponsorship is about partnering with external organisations to access or use , or association with the company's

brand or image, employee time or other resource through an exchange of monies, products, services, content or other intellectual property

Any contribution or item of value given as a donation or sponsorship must be legitimate and justified and should not be given in exchange for obtaining inappropriate advantage or benefit.

- **Excessive or inappropriate entertainment** – to influence business contacts, e.g. giving a company director and his family an expensive holiday before he makes a decision to assign a contract where the company has submitted a tender.
- **Expensive gifts** – to influence the recipient, e.g. receiving an iPad from a customer knowing that it has been given with the intent of getting a loan application approved.
- **Extortion** -to directly or indirectly demand or accept a bribe, facilitation payment or kickback.
- **Facilitation payments or "grease" payments** - this usually involves small non-discretionary payments to government / public officials to speed up routine administrative processes, e.g. giving a government official a carton of beer to process licenses for the company ahead of others. It should be noted that no distinction is made between bribes and facilitation payments as both are prohibited.
- **False jobs or "consulting" relationships** - engaging third parties to perform tasks without following set procedures and facilitating illegal payments through this arrangement.
- **Gifts, travel, and hospitality (entertainment)** - offering or accepting any gift, reward or hospitality from any individual, company or organisation with whom one has contact with, as an inducement either for doing something or not doing something in an official capacity.
- **Inflated commissions** – where higher than normal commissions are paid as a reward for particular services.
- **Kickbacks** - where a percentage from the contract or other financial reward is improperly returned to the person awarding that contract or benefit, e.g. company wins a new contract by promising to pay the customer's representative a cash payment.
- **Political and Charitable contributions** - these can be used as bribes, e.g. making a donation to a political party to support legislation that is favourable to the company.

2. Requirements of the Policy

2.1 Registration and Declaration of Interests and Gifts

Maintaining an open or transparent culture in a work place helps in preventing acts of bribery, corruption, fraud and improper activities.

Staff at many levels will have an opportunity to influence the choice of suppliers and contractors. Members of staff must ensure that the selection of suppliers and contractors is always determined in a way that reflects the best interests of Kina Bank, and not the personal or family interest of any staff. It is therefore important that, established policies and guidelines must be followed in all business dealings that includes undertaking proper due diligence and complying with the requirements of the *Outsourcing Policy*.

Furthermore, as required also under the *Conflict of Interest Policy*, Kina Bank must maintain processes for its directors and staff to disclose any conflict of interest and to record gifts and benefits received during their interaction with clients and third parties. The following processes will be put in place:

- **Disclosure of Interest Form** – this Form (*Appendix A*) must be completed by all Directors and employees in a conflict of interest or potential conflict of interest situation **as required under the Conflict of Interest Policy**;
- **Gift and Entertainment Form** – this Form (*Appendix B*) must be completed by all employees, Key Management Personnel¹ and Directors of Kina Bank **as required under the Gift and Entertainment Policy**;
- **Disclosure of Interest Register** – the **Company Secretary** will maintain a Register for the Directors whilst the Chief Risk Officer will maintain an up-to –date register of Senior Managers' interests as also required under the **Conflict of Interest Policy**; and
- **Gift and Entertainment Register** – the **Company Secretary** will maintain a Register for the Directors whilst the Chief Compliance Officer will maintain a register on behalf of the Chief Risk Officer for employees **as required under the Gift and Entertainment Policy**.

The Chief Compliance Officer will have oversight of these registers and undertake annual reviews in consultation with the respective BU Managers. The gift and disclosure of interest registers will be consistent with the requirements of Kina Bank's Code of Ethics and Business Conduct and are vital for the control processes used to support the implementation of both the Conflict of Interest and the Anti-Bribery and Anti-Corruption policies.

Appendices **A**, **B** and **C**, provide examples of the Disclosure of Interest and Gifts and Entertainment Forms and the registers that can be maintained for disclosing, recording gifts and benefits and conflict of interest concerning Directors and employees.

2.2 Duties and Responsibilities

Kina Bank's Board has overall responsibility for the ethical conduct of its Directors, members of the Executive Committee and staff in all relationships and business dealings. It is responsible for ensuring that

¹ Key Management Personnel: Group Managers and Heads of Business Units who directly report to any one of the CEO, EGM Personal Banking, EGM Business Partners & Wealth, Chief Operating Officer, Chief Transformation Officer, GM Corporate Affairs & Investor Relations, GM Culture, Diversity and Inclusion, GM Treasury & Financial Markets, CFO, CRO only.

Kina Bank complies with international sanctions, standards on bribery and corruption whilst also meeting the domestic obligations under relevant domestic laws and regulations of the jurisdictions that Kina Bank operates in. The Board will therefore oversight performance and compliance with this Policy.

Senior management of Kina Bank are accountable for establishing related policies and processes, ensuring that they are observed and for providing regular reports to the Board. Senior management is also accountable for assessing and reviewing compliance with this policy biannually.

All Board and Senior Management directives will be implemented through the Group Risk Business Unit (Risk Unit). The Risk Unit will be expected to take the lead by providing guidance, advice, and direction to promote compliance with the policy, ensure effective reporting, escalation, and resolution of bribery and corruption compliance issues.

All Board Directors, Senior Management and Staff are:

- required to familiarise themselves with the requirements of this policy;
- prohibited from accepting, offering, promising, or paying a bribe of any kind;
- prohibited from offering gifts, entertainment or hospitality that they know or believe could be deemed **unethical**;
- prohibited from accepting or soliciting a bribe of any kind (and must report and register any such offers); and
- required to report any suspicion of corruption or bribery to the relevant Business Unit Manager and Chief Risk Officer. Alternatively the staff can follow the procedures set in Kina Bank's *Protected Disclosure (Whistle Blower) Policy*.

Compliance by third parties will be the responsibility of Kina Bank Directors, Senior Management and Staff to ensure that the requirements of this policy are communicated to them and business dealings are conducted in a fair, ethical and professional manner at all times.

2.3 Outsourcing of Services

All outsourcing of services must be consistent with guidelines set out under Kina Bank's *Outsourcing Policy*. Any breaches or suspected breaches of that policy involving suspicions of corruption concerning any service performed by third parties must be reported immediately to the Chief Risk Officer, and/or the relevant Executive General Manager.

The guidelines under the Protected Disclosure (Whistle Blower) Policy may also be followed in reporting on bribery and corruption issues involved in the outsourcing of services with third parties.

2.4 Hospitality and Gifts

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the giving or receipt of gifts, provided that this is done in accordance with Kina Bank's Gift and Entertainment Policy. Normal and appropriate hospitality and gifts would include where the hospitality or gift:

- is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;

- is given in the name of Kina Bank rather than individuals;
- complies with local law and Kina Bank's internal policies;
- does not include cash or a cash equivalent (such as gift certificates or vouchers);
- is appropriate in the circumstances. Christmas gift or gifts exchanged during official engagements by Kina Bank and other stakeholders, for instance during Annual General Meetings and Corporate Events are good examples;
- taking into account the reason for the gift, is of an appropriate type and value and given at an appropriate time;
- is recorded appropriately in relevant registers;
- is given openly, not secretly; and
- is not offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval from Senior Management.

There are however, situations where offering and accepting of gifts and hospitality are not acceptable. It is not acceptable to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

2.5 Facilitation and Kickbacks

Kina Bank does not make and will not accept Facilitation Payments or Kickbacks of any kind. Facilitation Payments and Kickbacks are bribes and prohibited by this policy.

Facilitation payments are unofficial payments made to secure or expedite a routine action or process. For instance, it may involve accepting a payment from a Kina Bank customer to process a cheque, loan or any transaction. This is also classified as facilitation payment and prohibited under this policy.

If a third party requests a payment to be made on behalf of Kina Bank during a business dealing, it is important to ask and confirm what the payment is for, whether or not the amount requested is proportionate to the goods and services provided, and whether the payment is appropriate to the ordinary course of business, and furthermore, a receipt for the payment must be provided.

Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

Any concerns, suspicions or issues regarding such payments must be reported to the respective BU and subsidiary managers as well as the Chief Risk Officer in the first instance. Alternatively, the guidelines of the Protected Disclosure (Whistle Blower) Policy may also be used to report on such payments.

2.6 Donations

As a responsible corporate citizen, Kina Bank engages with and supports charity and community initiatives aimed at improving and sustaining the lives of people and communities in which we operate. Donations are acceptable whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that donations are not used as a scheme to conceal bribery.

All donations made on behalf of the Company or any of its subsidiaries must be approved in advance by the Chief Executive Officer (CEO) and/or the Executive Committee.

2.7 Record Keeping

In line with the Statute of Limitation and Kina Bank's internal policies, employees must keep financial records and have internal controls in place which will evidence the business reason for making payments to third parties. The following actions must be taken with recording hospitality and gifts:

- records of hospitality and gifts offered and received must be maintained in a register, (as referred to in Section 4 above) which will also be subject to management review; This includes maintaining copies of receipts and invoices to verify payments;
- all expenses claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with Kina Bank's finance related policies and specifically record the reason for the expenditure. Kina Bank's Finance Department is responsible for these records.

All Directors, Senior Management and staff must at all times maintain proper records and submit full copies of payments (funds spent on gifts and entertainment) made (including invoices and receipts) for reconciliation and accounting purposes. Any detection of suspicious payments and misuse of company resources must be brought to the attention of the CEO and/or the Chief Risk Officer as soon as possible for deliberation and possible actions.

2.8 Red Flags

The following is a list of red flags that may indicate the possible existence of corrupt practices and should be kept in mind by all those subject to this Policy:

- a) Unusually large commission payments to a third party or agent where the third party or agent does not appear to have provided significant services;
- b) Cash payments, or payments made without a paper trail or without compliance with normal internal controls;
- c) Unusual cash payments to personnel for which there is little or no proper supporting documentation;
- d) Refusal to provide information or inadequate information is provided during due diligence checks;

- e) Payments to be made through third party countries or to offshore accounts;
- f) Private meetings requested by public contractors or companies hoping to tender for contracts;
- g) Not following Kina Bank's policies or procedures – abusing the decision-making process;
- h) Unexplained preferences for certain sub-contractors;
- i) Invoices rendered or paid in excess of contractual amounts given the service stated to have been provided or appears to be non-standard or customized;
- j) If a third party or agent;
 - (i) engages in, or has been accused of engaging in, improper business practices;
 - (ii) has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a 'special relationship' with Public Officials;
 - (iii) insists on receiving a commission or fee payment before committing to sign up to a contract with Kina Bank, or carrying out a government function or process for Kina Bank;
 - (iv) requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
 - (v) requests that payment is made to a country or geographic location different from where the Third Party resides or conducts business;
 - (vi) requests an unexpected additional fee or commission to 'facilitate' a service;
 - (vii) demands lavish Gifts, Invitations or Hospitality before commencing or continuing contractual negotiations or provision of services;
 - (viii) requests that a payment is made to 'overlook' potential legal violations;
 - (ix) requests that Kina Bank provides employment or some other advantage to a friend or relative;
 - (x) requests for a political contribution or donation to the party or charity of their choice before agreeing to undertake a business relationship with the Company;
 - (xi) refuses to put terms agreed in writing;
 - (xii) requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to Kina Bank; or
 - (xiii) are offered an unusually generous gift or offered lavish hospitality by a Third Party.

This list is not intended to be exhaustive and is for illustrative purposes only. Kina Bank should be on alert for other indicators that may raise to a suspicion of corrupt activity.

3. Interaction with Other Kina Bank Policies

This Policy is an integral part of Kina Bank's suite of governance policies. Relevant related policies include but are not limited to:

- Compliance Risk Management Strategy and Framework
- Code of Ethics and Business Conduct
- Protected Disclosure (Whistle Blower) Policy
- Conflict of Interest Policy
- Gift and Entertainment Policy
- Outsourcing Policy
- Complaints Policy
- Breach Management Policy
- Human Resources Policies and Procedures Manual
- Gift and Entertainment Reporting Form
- Gift and Disclosure Procedures
- Complaints Handling Procedures

4. Implementation, Training and Communication

4.1 Responsibility

The Chief Compliance Officer is responsible for the effective implementation of this policy. He/ She must work in close consultation with all Business Unit Managers to ensure that the requirements of the policy are communicated, appropriate training is carried out, reviews and updates are done and reports provided to the Board and Senior Management.

4.2 Monitoring and Review

Monitoring is a proactive approach by Kina Bank to identify procedural or training weaknesses in an effort to prevent regulatory and policy breaches. As part of the quarterly compliance updates done by the Risk Business Unit, it will also require updates from the Company Secretary and the Human Resource Business Units as to any information declared by staff, management and the Directors. The Chief Risk Officer will review the information to determine any information or issue that needs to be brought to the attention of the Senior Management and the Board.

The Policy will be reviewed annually to ensure that:

- disclosures of interests, gifts and hospitality meet the requirements of this policy and other relevant Kina Bank policies;
- third party service provider operations are consistent with policy;
- proper document filing and retention procedures are being maintained through administration of the registers;
- Corrective measures have been taken to address reported incidents of bribery and corruption.

This Policy will also be reviewed from time to time to take account of changes to legislation, regulatory developments or significant organizational changes such as changes in Kina Bank's business operations, products, or services. Modifications that are necessary should be made expeditiously to minimize compliance risk, and applicable personnel in all affected operating units should be advised of the changes once these changes are approved by the Board.

4.3 Training and Communication

The Chief Risk Officer will ensure that this Policy is communicated to all Board members and employees at least once per year. He/ She will also ensure that appropriate and regular training is carried out for staff. Consideration of the appropriate level of training should also be given to those members of staff who are to be involved in higher-risk activities, either specifically or as part of other training. Staff dealing directly with customers at the branches, procurement, finance, internal audit, information technology, AML and Compliance (not an exhaustive list) may be categorised as those involved in higher risk activities and appropriate training which may be more frequent and tailored should be organised for them.

5. Policy Breaches

5.1 Breaches

All cases of alleged/suspected bribery and corruption will be investigated and followed up by the application of all available remedies. Employees who commit an act of bribery or corruption, violate Kina Bank's Code Ethics and Business Conduct and breach this policy will be subject to disciplinary action, up to and including termination with cause.

Issues or concerns of bribery and corruption raised by staff will be taken seriously and investigated. This will be done in accordance with the requirements of the Whistle Blower Policy as appropriate to protect the identity of staff.

No employee will be adversely affected or disciplined by Kina Bank because the employee refuses to carry out a directive which violates any applicable laws or this Policy. However, anyone who files a complaint with the intention of spreading lies or to threaten or damage another person's reputation, will be the subject of disciplinary action.

Once an issue on bribery and corruption is reported, the respective Business Unit Manager and the Senior Investigations Officer will investigate the matter and recommend corrective or disciplinary actions to be taken. The disciplinary actions applied must be consistent with standing Kina Bank HR disciplinary policies.

5.2 Protection

Employees who refuse to take part in bribery or corruption, or report in good faith under this policy their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future will be protected from detrimental treatment or retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

APPENDIX A – Disclosure of Interests Form

I declare that, to the best of my knowledge, I am unaware of any circumstances that could be construed as providing any possible conflict of interest regarding my employment with Kina Bank and the activities of another business (shown below) of which I have a position of influence, and any such situation will be brought to the immediate prior attention of Kina Bank in future transactions in which I am involved or otherwise aware.

1. Name of Company/Business(s) Relationship (e.g. Owner, Director², Adviser, Sales Representative), giving details of interest or position of influence in the business.

2. Details of possible activity with Kina Bank.

3. Name of persons employed with Kina Bank with whom you have a personal relationship with and nature of the relationship (e.g. Spouse, Sibling, Parent, Child)

4. **Either**

I declare that as a consequence of my disclosure of interest in the above mentioned, I have a potential conflict of interest in light of my employment with Kina Bank (*tick if appropriate*).

Or

I declare that, although no conflict of currently interest exists, there may be a potential conflict of interest in the future with my employment at Kina Bank and the activity described in (2) and or the relationship disclosed to in (3).

5. I further declare that I will immediately inform Kina Bank of any changes in circumstances regarding this action.

Signature *Date*

Printed name *Business Unit*

² Approval must be obtained from the CEO and/or CRO for positions of Director, Secretary, Public Officer or Executive Officer of a private or public company or Trusts.

CERTIFICATION BY EXECUTIVE GENERAL MANAGER

I have noted this business interest's declaration. I am satisfied that no conflict of interest will occur, and I authorise the dealing described below by Kina Bank, subject to any conditions listed below (*if applicable*):

1. AUTHORISED DEALING

2. CONDITIONS

- a. The employee will take no part in Kina Bank's decision making process regarding the business interest, and or regarding the employee with whom a personal relationship exists.
- b. The employee will not utilise any of Kina Bank's facilities or property related to this business interest.

Signature *Date*

Print name *Business Unit*

**APPROVAL FOR POSITION OF
DIRECTOR, SECRETARY, PUBLIC OFFICER OR EXECUTIVE OFFICER
OF A PRIVATE OR PUBLIC COMPANY OR A TRUST**

I approve _____ to hold the position of _____ with the company, _____ provided that if any potential or actual conflict of interest should arise the employee withdraws from any Kina Bank or Company dealing with the matter concerned.

Signature *Date*

Print name

Chief Executive Officer / Chief Risk Officer

APPENDIX B – Disclosure of Interest Register

Name of Employee	Description of interest	Has Senior management been notified of the interest?	Date of disclosure	Steps taken by Senior Management for dealing with the conflict	Actions taken by the Employee to address the conflict

APPENDIX C – Gift/ Entertainment Reporting Form (refer to Gift and Entertainment Policy)

Gifts and Entertainment Reporting Form

TO: Name, Business Unit, Company

FROM: Name, Business Unit, Company

DATE: Click here to enter a date

Please enter in the Register maintained by you in accordance with the Gift and Entertainment Policy of the receipt of the following gift.

Particulars	Complete details
Date received:	
Details of gift or entertainment:	
Estimated Value/ Exact Cost:	
Nature of Gift/ Entertainment:	
Gift/ Entertainment provided by:	

Sign:Date:

Approval

I confirm that I am satisfied that the receipt of the above described gift was appropriate for the reason stated and accorded with the requirements of the Gift and Entertainment Policy.

Signature:Date:

Attachments:

Email Endorsements and Approvals is acceptable.

This form must be filled in for any gift or entertainment received for registry purposes.