

জনতা ব্যাংক পিএলসি
প্রধান কার্যালয়, ঢাকা

মানি লন্ডারিং ও সন্ত্রাসে অর্থায়ন
প্রতিরোধ ডিপার্টমেন্ট

নির্দেশ বিজ্ঞপ্তি নং: ১৪৩২/২৬

তারিখ: ২৯ সেপ্টেম্বর ২০২৬
১৪ আশ্বিন ১৪৩৩

সকল উপব্যবস্থাপনা পরিচালক/ সকল মহাব্যবস্থাপক
একান্ত সচিব, ব্যবস্থাপনা পরিচালক, সকল উপ-মহাব্যবস্থাপক
সকল সহকারি মহাব্যবস্থাপক এবং ব্যবস্থাপক
প্রধান কার্যালয়ের সকল সচিবালয়/ ডিভিশন/ বিভাগীয় কার্যালয়/
লোকাল অফিস/ জনতা ভবন কর্পোরেট শাখা/ সকল স্টাফ কলেজ/ প্রধান কার্যালয়ের সকল ডিপার্টমেন্ট/
সকল এরিয়া অফিস/ সকল শাখা/ উপশাখা এবং সকল সাবসিডিয়ারী কোম্পানী।
জনতা ব্যাংক পিএলসি, বাংলাদেশ।

বিষয়: জনতা ব্যাংক পিএলসি-এর পর্যদ অনুমোদিত Anti-Bribery & Anti-Corruption (ABAC)
Policy পরিপালন প্রসঙ্গে।

জনতা ব্যাংক পিএলসি-এর Anti-Bribery & Anti-Corruption (ABAC) Policy, যা ব্যাংকের পরিচালনা পর্যদ কর্তৃক (১৪ জুলাই ২০২৬ তারিখে অনুষ্ঠিত ৮৯৪তম সভায়) অনুমোদিত, এতদসঙ্গে সংশ্লিষ্ট সকলের অবগতির জন্য জারি করা হলো।

ব্যাংকের কার্যক্রমে ঘুষ ও দুর্নীতির সকল প্রকার ঝুঁকি প্রতিরোধ, শনাক্তকরণ, রিপোর্টিং ও মোকাবিলার লক্ষ্যে উক্ত পলিসি-এর বিধানসমূহ যথাযথভাবে পরিপালন এবং নিজ নিজ দায়িত্ব ও কার্যপরিধির মধ্যে এর কার্যকর বাস্তবায়ন নিশ্চিত করতে হবে।

ABAC Policy-এর ব্যাপ্তি (Scope) ও প্রযোজ্যতা (Applicability) উক্ত পলিসিতেই নির্ধারিত রয়েছে। অতএব, উক্ত পলিসি-এর আওতাভুক্ত সকল ব্যক্তি ও প্রতিষ্ঠান/সত্তা পলিসি-তে তাদের জন্য প্রযোজ্য বিধানসমূহ পরিপালন করবেন।

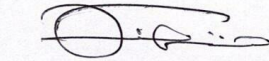
ব্যাংকের বৈদেশিক শাখা, সাবসিডিয়ারি ও অন্যান্য প্রযোজ্য কার্যক্রমের ক্ষেত্রে সংশ্লিষ্ট jurisdiction-এর প্রযোজ্য আইন, বিধি-বিধান ও regulatory requirements-সহ ABAC Policy-এর প্রাসঙ্গিক বিধানসমূহ অনুসরণ করতে হবে। স্থানীয় প্রযোজ্য বিধান পলিসি-এর তুলনায় অধিক কঠোর হলে, পলিসি অনুযায়ী অধিক কঠোর বিধান/requirements পরিপালন করতে হবে।

সংশ্লিষ্ট ডিভিশন/ডিপার্টমেন্ট, অফিস, শাখা এবং বৈদেশিক অপারেশন -এর প্রধানগণ তাঁদের নিজ নিজ এখতিয়ারের মধ্যে সংশ্লিষ্ট কার্যক্রমে ABAC Policy-এর প্রযোজ্য বিধানসমূহ যথাযথভাবে অবহিত করা, বাস্তবায়ন করা এবং পরিপালন নিশ্চিত করার জন্য প্রয়োজনীয় ব্যবস্থা গ্রহণ করবেন।

ABAC Policy-এর কোনো বিধান লঙ্ঘন বা অপরিপালনের ক্ষেত্রে পলিসি, প্রযোজ্য আইন, বিধি-বিধান, regulatory requirements এবং ব্যাংকের সংশ্লিষ্ট নীতিমালা/নির্দেশনা অনুযায়ী যথাযথ ব্যবস্থা গ্রহণ করা হবে।

অতএব, সংশ্লিষ্ট সকলকে পরিচালনা পর্যদ কর্তৃক অনুমোদিত ABAC Policy-এর যথাযথ পরিপালন ও কার্যকর বাস্তবায়ন নিশ্চিত করার জন্য আদিষ্ট হয়ে প্রয়োজনীয় ব্যবস্থা গ্রহণের নির্দেশনা প্রদান করা হলো।

কর্তৃপক্ষের আদেশক্রমে,



(ফরিদ উদ্দিন আহমেদ)
উপমহাব্যবস্থাপক



(মোহাম্মদ সাফায়েত হোসেন)
মহাব্যবস্থাপক ও CAMLCO

সংযুক্তি : “Anti-Bribery and Anti-Corruption Policy” of Janata Bank PLC.

Anti Bribery And Anti Corruption Policy



Janata Bank PLC.

Your Committed Partner In Progress

Anti-Bribery and Anti-Corruption Policy of Janata Bank PLC.

July, 2026

Janata Bank PLC.

ML & TF Prevention Department

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Preface

Money Laundering and Terrorist Financing Prevention Department plays a crucial role to prevent bribery and corruption by disrupting the financial mechanism used to hide illicit funds. As per Money Laundering Prevention Act-2012, Corruption & Bribery is one of the major predicate offences and is on the top of the list. The core importance lies in its ability to detect the movement of money linked to bribery & corruption, which are often the underlying activities that generate the funds that needs to be “cleaned”.

At Janata Bank PLC., our foundation resets on unwavering integrity and ethical excellence. In today’s dynamic financial landscape, maintaining absolute trust is paramount. To uphold these core values and safeguard our reputation, we are proud to introduce our comprehensive Anti-Bribery & Anti-Corruption (ABAC) policy which has been duly approved by the board of Directors in its 894th meeting held on 14 July, 2026.

This policy is more than a compliance requirement; it’s a strategic pillar for sustainable growth, ensuring we meet global standards and serve our stakeholders with the highest ethical principles. It reinforces our commitment to a culture of transparency, where every transaction reflects our dedication to fairness and accountability.

We urge you to embrace this policy fully, understand its guidelines, participate in the training when held and act as vigilant custodians of our ethical standards. Together we will build a stronger, more trusted Janata Bank PLC. and set a benchmark for integrity in the banking sector.



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List of Abbreviations

ABAC/ABC Anti-Bribery & Anti-Corruption

BODs Board of Directors

VD Vigilance Department

MLPA Money Laundering Prevention Act

ATA Anti-Terrorism Act

EC Executive Committee

FERA Foreign Exchange Regulation Act

EWRA Enterprise Wide Risk Assessment

FATF Financial Action Task Force

AML Anti Money Laundering

CFT Combating Financing of Terrorism

RMC Risk Management Committee

HRD Human Resources Division/Department

A & ID Audit & Inspection Department/Division

JB PLC. Janata Bank Public Limited Company.

Anti-Bribery & Anti-Corruption Policy of Janata Bank PLC.

1. Preamble

The Anti-bribery and Anti-Corruption Policy (“Policy”) of Janata Bank PLC. has been developed in alignment with JBPLC.’s code of conduct for employees, various policies (Whistle Blowing Policy, Policy on Management of Conflict of Interest, Money Laundering & Terrorist Financing Risk Management Policy, ICC Policy etc.), rules and regulations adopted by JBPLC. and in conformance with the legal and statutory framework of anti-bribery and anti-corruption legislation prevalent in Bangladesh. The Policy reflects the commitment of JBPLC and its management for maintaining highest ethical standards while undertaking open and fair business and culture, following the best practices of corporate governance and enhancing the JBPLC’s reputation at appropriate levels.

JBPLC. believes that trust is the essence of the relationship between the bank and the customer, and any sort of bribery and/or corruption leads to the dilution of the trust. The bribery and/or corruption also increases uncertainty in business and can have grave reputational, financial and legal consequences. Janata bank PLC. has zero tolerance towards all forms of bribery and/or corruption and it has resolved to initiate proactive measures to mitigate such risks including formulation of this policy. Janata bank Service Rule (HR Policy) details the bank's commitment to ethical conduct and compliance with relevant laws and regulations. This policy should be read in conjunction with the Code of Conduct, Whistle Blower Policy, Money Laundering & Terrorist Financing Risk Management Policy and ICC Policy of Janata Bank PLC.

If any associate suspects or becomes aware of any potential bribery/corruption involving the bank, it is the duty of the employees to report their suspicion or awareness to the appropriate authority i.e. Vigilance Department (VD) which is headed by a Deputy General Manager.

2. Purpose

This Policy emphasizes JBPLC.’s zero tolerance towards bribery and corruption practices. The Policy provides necessary information and guidance on how to recognize and deal with bribery and corruption issues. The ABAC policy provides guidance on how to prevent, deal with and combat bribery and corrupt activities and issues that may arise in the course of business and to ensure that adequate procedures are implemented to prevent the occurrences of corrupt practices in the bank in line with the guidelines on adequate procedures along with abiding by laws, regulations, circulars, policies as well as manage overall compliance matters in a bank. The Janata Bank PLC. commits to deterring, preventing, detecting and responding to any and all types of bribery, corruption. So, the purpose of the policy is to prevent bribery, corruption in the organization’s operational practices in a bank in consistence with the integrity of uncompromising adherence to ethics and values stated in the bank’s mission and vision.

3. Scope of the policy:

This policy extends to Janata Bank PLC. and all branches and sub branches (national and overseas), subsidiaries and affiliates over which JB PLC. has control. It covers all directors, employees (permanent and contractual), agents, business partners and all business dealings and transactions. This Policy applies to all Stakeholders, or any other person associated with JBPLC. and who may be acting on behalf of JBPLC. This Policy sets out the minimum standard that must be followed at all times. Where any local regulations are stricter than this Policy, this will take precedence over this Policy.

4. Definition:

4.1 Bribery: Bribery is defined as the giving or promising of a financial or another advantage to another party where that advantage is intended to induce the other party to perform a function improperly, to reward them for the same, or where the acceptance of that advantage is in itself improper conduct. Bribery is the type of Corruption most closely associated with corruption in general. In a broad sense, bribery involves improperly offering, authorizing, giving, agreeing to give, promising, soliciting, providing, receiving or agreeing to receive a benefit or something of value (gratification) to or from any person including a close relative of such a person (either directly or indirectly) in order to obtain or retain business or an advantage or to induce, influence or reward improper conduct or an important decision.

4.2 Corruption: Corruption is defined as the misuse or abuse of any office for advantage or benefit for oneself or another person. Corruption is a fraudulent conduct that happened in the form of dishonesty or criminal offence by a person or organization entrusted with authority. IMF has defined corruption as the use of public office for private gain or in other words, use of official position, rank or status by an office bearer for his/her own personal benefit. Corruption is practiced to gain illegitimate benefits or gain. It includes bribery, extortion, fraud, embezzlement, nepotism, cronyism, misappropriation and breach of trust etc.

5. Corruption and Bribery induced Money Laundering

Corruption, Bribery and money Laundering are intrinsically linked. Similar to other serious crimes, corruption offences such as bribery and theft of public funds are generally committed for the purpose of obtaining private gain. Money Laundering is the process of concealing illicit gains that were generated from criminal activity. By successfully laundering the proceeds of a corruption offence, the illicit gains may be enjoyed without fear of being confiscated. Combating Money Laundering is a cornerstone of the broader agenda to fight organized and serious crime by depriving criminals of ill-gotten gains and by prosecuting those who assist in the laundering of such ill-gotten gains. The FATF recognizes the link between corruption and money laundering including how AML/CFT measures help combat corruption, bribery and other illegal activities. The FATF also considers how effectively AML/CFT measures are implemented in a country by considering the number of investigations, prosecutions and convictions for money laundering and the amount of property confiscated in relation to money laundering or underlying predicate offences including corruption and bribery (FATF Recommendation 32)

6. What is Not Acceptable

It is not acceptable from any employee of the bank or person related to an employee as friend or family member, acting on behalf of such employee, to:

- a) Indulge in acts or conduct that constitutes bribery and/or corruption as defined herein above. Acts and conduct constituting bribery and/or corruption shall not be limited to relationship with existing customers and third parties of the Bank but also prospective customers, third parties and other unrelated entities having prospects of future business relationship with the Bank.
- b) Offer any payment, gift, hospitality, gratification or favoritism to any person, public official or person associated with public official having or purporting to have a business relation with the bank or with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given to facilitate or expedite a routine procedure or dispensation of service.
- c) Accept or solicit any payment, advantage, gratification, gift or hospitality from a customer or third party that the employee knows or suspects of being offered with the expectation that it will obtain a business advantage for him/her.
- d) Threaten or retaliate against another employee who has refused to indulge in acts or conduct that constitutes bribery and/or corruption or who has adopted Whistle Blower mechanism of the bank to raise a concern.
- e) Engage in any activity that might lead to a breach of this policy.
- f) Where acts and conduct stated in clause 6 (a) to (d) above are indulged in by a person acting on behalf of an employee for the benefit of the employee or any other person in whom the employee is interested, the employee shall be deemed to have indulged in such acts and conduct. The points stated above are illustrative in nature and in no way intend to limit the applicability of this policy.

7. Roles & Responsibilities of Employees

- All employees must ensure that they read, understand, and comply with this policy.
- All employees are responsible for complying with this policy, any corresponding rules & procedures and all applicable anti-corruption laws while performing their duties.
- The prevention, detection and reporting of acts and conduct constituting bribery and/or corruption shall be the responsibility of all employees.
- Employees are required to avoid any activity that might lead to or suggest a breach of this policy.
- Employees should raise concerns through the Whistle Blower mechanism as soon as possible if they believe or suspect that a breach of or conflict with this policy has occurred or may occur in the future. The concerns regarding bribery and/or corruption can also be raised under Janata Bank PLC Whistle Blowing Policy- 2022.

8. Anti-Bribery & Anti-Corruption Standards

8.1 Interaction with Customers

Where an employee is responsible for dealing with customers, it is not acceptable from him/her (or someone on his/her behalf) to accept, give, promise to give or offer any payment, gift, hospitality, gratification or advantage with the expectation or hope that a business advantage will be given or received or to reward for a business advantage already given. The Janata Bank PLC. prohibits all its employees from indulging in such practices.

8.2 Dealing with Public Officials

Employees required to deal with public officials or persons associated with public officials have higher/enhanced obligation to ensure compliance of the principles enumerated in this policy.

8.3 Political Contributions

- The Bank is apolitical and does not contribute financial or other support to political parties and politicians.
- No employee should make any political contributions on behalf of the bank, use any of bank's resources to assist a candidate or any political party or elected official in any campaign or coerce or direct another employee to vote in a certain way.

8.4 Facilitation Payments

- Facilitation payments, in whatever form, irrespective of amount are prohibited by the bank.
- The bank does not tolerate its employees or third parties, in their relationship with the bank, offering, promising, soliciting, demanding, giving or accepting any kind of facilitation payments to or from any third party.

8.5 Charity, Sponsorship, Donations

- The bank is committed to be a responsible member of communities where it operates, to support those in need which may include sponsoring various events, initiatives, and organizations.
- In no case, charitable contributions, sponsorships, or donations can be used as a subterfuge for bribery. All charity, sponsorship or donation activities are to be done in good faith and should not be aimed to gain any business or other advantage quid pro quo that may be considered improper.

8.6 Human Resources Related Activities

- Human Resources (HR) activities such as offering employment, promotions, transfers, postings, trainings, and internship are often deemed to be something of value and therefore giving, offering, promising the same in order to obtain or retain an undue advantage is considered as bribery and/or corruption.
- The bank does not support any unethical HR activity violating the principles of objectivity, competence, professionalism, and equal opportunities, irrespective of it covered under the definition of bribery and/or corruption or not.
- In order to avoid the risk of being perceived as bribery and/or corruption, all HR practices, including but not limited to, offers of employment (both full time and part time), promotions or transfers to another position, providing training or development opportunities, offers of internship (both paid and unpaid) should be only through merit-based and competitive process, wherever applicable.

8.7 Procurement and Third-Party Compliance Expectation

In the course of its business activities, Janata bank PLC. engages with a large number of third parties/vendors and such relationships have potential to expose the bank to risk of being involved or perceived to be involved in bribery and/or corruption. In order to effectively mitigate such risk, the bank expects all its third parties to refrain from activities constituting bribery and/or corruption. Before, during or existing the relationship with third parties (vendors, agents, consultants) Janata Bank PLC. must conduct ABAC due diligence mechanism based on contractual protection by including mandatory ABAC clauses and statements from third parties, background checking/screening of third parties by internal watch list or sanction database, risk-based categorization based on risk profile, perform on going due diligence as continuous monitoring etc. Third party relationships are maintained, managed and monitored internally by following above due diligence process, periodic risk assessment, periodic audit etc. through our concern departments/divisions like Procurement Department, IT Procurement Security Compliance & Maintenance Department, Business Development and marketing Department, Public Relation Department etc. along with their responsible team to oversight these third-party relationships. Failure by a third party to comply with this policy and any applicable ABAC laws may result in the termination of business with the non-compliant third party. Further legal action may also be taken in the event that the bank's interests have been harmed as a result of non-compliance. Any such act of the third party not related with the bank, will not fall under the purview of this policy. To prevent third-party bribery and corruption, the following clause or like this will be included in all contracts: -

“We warrant that we will comply with all applicable bribery and corruption laws of your internal ABAC policies, have not engaged or will not engage in any corrupt practices (directly/indirectly), will allow your organization to inspect our (the third party’s) books, records and accounts related to the contract, explicitly allow for immediate termination of the contract if we breach any anti-bribery policies or laws. We also ensure to train our employees ABAC laws and will report any suspected bribery to your organization.”

09. Policy Statement

This Anti-Bribery and Anti-Corruption Policy (the ‘Policy’ or ‘ABAC Policy’) provides a framework for ensuring compliance with legislations governing bribery and corruption globally. Janata Bank PLC. practices a zero-tolerance approach to bribery and corruption and is committed to act with integrity. As part of this commitment, any form of bribery and corruption is not acceptable. We prefer foregoing business opportunities rather than paying a bribe or engaging in corrupt practices. In each of the jurisdictions where we operate, Stakeholders are expected to follow the ABAC Policy or the applicable laws around bribery and corruption, whichever is stricter. No Stakeholder can waive compliance with the Policy.

- i. Stakeholders: Shall mean to include but not limited to individuals, directors, employees working at all levels and grades (whether permanent, fixed term or temporary), consultants, contractors, trainees, secondary staff, casual workers and agency staff, interns, agents, business partners, Third-parties / vendors, service providers, suppliers, contractual staff, apprentices, direct selling agents, and any other person / entity acting for and on behalf of JBPLC.

10. Program for Countering Bribery and Corruption

JB PLC. commits to the implementation of an effective program to counter corruption and bribery. This program shall be approved by the Board and publicized across all directors, employees as frequently as appropriate in order to nurture a zero tolerance of corruption and bribery culture. Primarily the monitoring & supervision responsibilities of ABAC compliance program falls under the Vigilance Department to oversight these. This program clearly states the values, policies and procedures to be applied to prevent corruption, bribery and fraud from occurring in all business dealings and transaction that are within JBPLC.’s control. The roles and responsibilities for implementing the program are as follows:

10.1 Board of Directors (BODs)

The board of directors shall approve and adhere to this policy. Among others, it shall ensure that an effective system of internal control and risk management is implemented to cover all business dealings and transactions of JB PLC. that may give rise to the risk of corruption, bribery. The board shall ensure that there is periodic assessment of the risk of corruption, bribery as part of the program together with effective monitoring thereof.

10.2 Compliance Division (AML Compliance and/or Internal Compliance)

Compliance division will oversee the policy implementation, updates and overall regulatory adherence regarding this policy.

10.3 Risk Management Committee

Monitors high risk areas and assists the Board in overseeing the implementation, development and monitoring of the policy. This division is responsible for the review of strategy, policy, framework and guidelines prior to Board approval. This division assists in identifying risk in relation with the policy.

10.4 Internal Vigilance Department

Manages investigation, analysis, reporting of violations and taking initiatives basis on violation report which are submitted to Ombudsmen/Vigilance Head regarding any bribery, corruption, fraud and forgeries related cases. Key Functions include: (1) Receiving and examining allegations of corruption, bribery, and misconduct reported through hotlines, emails, or whistle blowers. (2) Processing investigation reports and recommending appropriate disciplinary action against employees found in violation of policies. (3) Maintaining close contact with external agencies, such as local law enforcement for cases involving criminal misconduct.

10.5 Human Resources Division

Ensures employee training, background checks and enforcement of code-of-conduct breaches. The support and commitment of all directors and employees is core to the success of the program. As such the program will be reflected in all major aspects of the human resource function-recruitment, communication, performance, evaluation, remuneration, recognition and promotion. In particular, no director or employee shall be sanctioned or admonished for refusing to pay a bribe or misuse entrusted power and authority, regardless of the financial impact of such refusal to JBPLC. On the contrary, all directors and employees shall be informed that a breach of this policy shall result in sanctions to the employee, including potentially termination of employment for cause, regardless of any benefit to JB PLC. that may have arisen as a result of the bribe or misuse of entrusted power and authority.

10.6 Audit & Inspection Division

The Division will lead the efforts to manage reporting of violations, monitor compliance with the policy and program to ensure that JB PLC. has and internal control system that prevents the risk of corruption and bribery. The division conducts reviews to ensure the policy's effectiveness and investigates potential breaches. This division assists the Board in fulfilling its oversight responsibilities of the policy. Also reviews the Bank's process of monitoring the operational procedures of the policy and approve case investigation report to be submitted to the Board. Compliance report to be submitted to the board on quarterly basis through our internal compliance department on regularization of the omission, fraud, forgeries, bribery and corruption related occurrences and other irregularities detected by the internal and external auditors and inspectors of regulatory authorities. The audit committee should hold at least six meetings in a year and it can sit any time as it may deem fit.

10.7 ML & TF Prevention Division/Department

As per MLPA-2012 and ATA-2009 ML & TF Prevention Division will closely collaborate with other above departments regarding bribery and corruption in a legal aspect whereas bribery and corruption comprised in the Predicate Offences by which Money Laundering occurs. ML & TF Prevention Division/Department will give special attention like screening to its employees, screening transaction of customers, proper and complete KYC process, KYC updating, identification and verification of customer and beneficial ownership, monitoring high risk accounts, identification of PEPs/IPs customers through screening, monitoring unusual pattern or complex transactions, CTR analysis and STR/SAR identification, monitor accounts of non-face-to-face customer or non-account holder customer etc. to prevent bribery, corruption and money laundering activities.

10.8 IT Support and Operational Functions

The success of the program depends on mainly legal, audit, compliance, risk management departments as well as IT support to avoid bribery, corruption and fraud. Audit and compliance division shall conduct periodic checks in the key areas where ABAC is high and when required, recommend improvements to such procedures and practices

11. ABAC Enterprise Wide Risk Assessment (EWRA)

ABAC Enterprise Wide Risk Assessment (EWRA) program will set and maintain minimum ABC standard. JB PLC. identify, analyze and mitigate the risk of bribery & corruption by understanding its current exposure to bribery & corruption. JB PLC. evaluate the efficiency and effectiveness of allocate resources and existing control to address vulnerabilities. This assessment should be comprehensive covering all aspects of the business including interactions with employees, internal and external environment on a holistic approach. JB PLC. will complete and maintain ABC Enterprise Wide Risk Assessment (EWRA) basis on the bank`s internal control and compliance by considering its inherent and residual risks within the overall assessment of ABC.

12. Reporting

The reporting of unwanted incident(s) regarding ABAC has multiple dimensions are mentioned below:

- Every employee must report any suspicious misconduct covered by this policy to the immediate supervisor.
- If an employee has any sort of fear of retribution, s/he must report the suspected misconduct directly to the Ombudsman/Vigilance Department of JB PLC.

13. Whistle –blowing Culture

Stakeholders who refuse to accept or offer a bribe, or those who raise concerns or report another`s wrongdoing, are sometimes worried about possible repercussions. Janata Bank shall not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical, or inappropriate behaviour. All reports shall be treated confidentially. For more information, please refer to the Whistle-blower Policy of Janata bank.

14. Breach of the Policy (non-compliances and penalties)

Compliance with the Anti-Bribery & Anti-Corruption Policy is a key requirement for all the employees along with adherence to other applicable laws, regulations, and processes. Any breach or violation of the policy by a director, employee or stakeholder will be subject to disciplinary or corrective action in terms of the applicable Janata Bank PLC. Service Rule-2020 (HR Policy) or contract terms and existing laws in Bangladesh and may result in an admonishment, sanction or termination of appointment or employment. In certain cases, JB PLC. may pursue both civil and criminal remedies in event of a willful breach. Failure to ensure compliance with this ABAC Policy could lead to serious consequences for Stakeholders, including but not limited to:

- Dismissal / termination of employment
- Termination of business relationship
- Reputational damage
- Reporting to regulatory authorities
- Conviction of offender under the applicable laws and regulations
- Personal criminal liability, including fines and / or imprisonment

15. Record Keeping and Internal Control and control

All of the bank's books, records, accounts and financial statements will continue to be maintained in reasonable detail, must be timely, accurately and completely reflected in the bank's transactions. Janata Bank PLC. shall maintain internal controls to prevent and detect potential violations of this Policy or of applicable laws. All Persons must completely and accurately document the amount of all transactions, including payments made on behalf of or expenses incurred by Janata Bank PLC. The management of JB PLC. shall ensure its system of internal control provides reasonable assurance on compliance with this policy. The checks and balance over the accounting records, adequate audit trail of all transactions are maintaining by our internal and external audit departments periodically. Janata bank Plc. affirms that it will not:

- Keep "off- the-book account" which is strictly prohibited.
- Alter, conceal any information, falsify and omit or misrepresent the facts of any record.
- Encourage or allow anyone else to compromise the accuracy and integrity of the bank.

16. Awareness Building

Awareness is the core to the success of the program in terms of zero-tolerance of corruption and bribery. All directors and employees shall be made aware and to comply with the program. In addition, Compliance division, HR division and Audit division shall provide a channel for directors and employees to seek confidential advice on matters relating to or arising from the policy without the risk of reprisal.

17. Training, Communication and Development

As part of the prevention, identification and detection of Anti-bribery and Anti-corruption issues, trainings and risk assessments shall be conducted. Training on this Policy shall form part of the induction process for new Employees at all levels working in areas that are susceptible to ABAC risk. Post joining and completion of the induction process, such new appointees must undergo the same trainings as scheduled for existing Employees. Existing Stakeholders at all levels, shall receive regular, relevant trainings on how to implement and adhere to this Policy throughout the term of their relationship with Janata Bank.

Stakeholders may be required to give an annual certification confirming their compliance with this Policy.

18. Review and Update

This policy will be reviewed and updated generally on bi-annual basis or when significant changes occur to business operations, laws, regulatory guidance or high-risk areas. Key triggers include audit findings, new regulations, entering new markets, or organizational restructuring to ensure the policy remains effective.

19. Common Red Flags of Bribery and Corruption

There are many red flags which may warrant enhanced due diligence or review. The following common red flags are given below:

- Requests for unusual contract terms;
- Unusual payment terms request.
- Requests for payment in cash, advance payments, payment to an individual or entity on behalf of the organization.
- Use of a shell company or some other non-transparent corporate culture.
- Heavy reliance on cash
- Vague or unsupported book keeping.
- Subject organized in or doing business in a country High Risk for Corruption and in an industry High Risk for Corruption by the bank.
- Compensation based on performance.
- Little to no relevant experience regarding the services to be provided.
- Transaction suggested by a public official, particularly one connected to the business issue.
- Subject recommended by or encouraged for us to use by a customer or government official.
- Adjustment of remuneration demand during the course of the engagement, particularly in close proximity to the award of business.
- Subject requests anonymity or is not forthcoming in providing relevant or key information.
- Objection to inclusion of ABAC clauses in contract.

- Party does not reside or have a significant business presence in the country where the service is to be provided.
- Utilizing company funds for personal purpose.
- Misappropriation of funds, securities, supplies or others assets by fraudulent means.
- Falsifying records such as pay-rolls, removing the documents from files and/or replacing it by a fraudulent note etc.

20. Conclusion

In essence, Janata Bank PLC. is not willing to be flexible on the adherence to this ABAC policy and will stick to its current view on a zero-tolerances stance against bribery and corruption where any form of corrupt payment or gratification involving employees and third parties associated with us is prohibited whether it takes place directly or indirectly. Our Board of Directors (BODs) and Senior Management are also committed to its oversight role in fostering a culture of integrity that upholds the higher ethical standards.

A copy of this Policy is available on Janata Bank PLC's website). (www.jb.com.bd)

21.0 References

1. The Penal Code -1860
2. Prevention of Corruption Act -1947
3. Anti-Corruption Commission Act - 2004
4. Money Laundering Prevention Act - 2012
5. Janata Bank's ML & TF Risk Management Guidelines/Policy-2025 (Updated)
6. Janata Bank's Risk Management Guidelines-2023
7. Janata Bank's Internal Control and Compliance Policy-2016
8. Code of Conduct for Janata Bank PLC.
9. Janata Bank PLC. Service Rules-2020
10. Janata Bank PLC. Whistle Blowing Policy-2022

SAY



**TO
CORRUPTION
&
BRIBERY**

