

## **The Code: Ethical Behavior and Business Integrity**

Caye International Bank Ltd. is committed to conduct business in a way that is above reproach. We strive to adhere to high ethical standards in all decisions that we make, taking into account not only the letter of the relevant laws, rules and regulations, but also whether a decision or activity is consistent with our values.

- We must consult managers or compliance staff if our own personal interests actually or potentially interfere, or might appear to interfere, with Caye International Bank's interests.
- We seek competitive advantage through superior performance rather than using unfair business practices
- We do not provide or accept improper inducements in the course of our business dealings with others.
- Compliance with Laws, Rules and Regulations Caye International Bank and its staff are committed to adhering to the standards and restrictions imposed by applicable laws, rules and regulations.
- We respect and strive to comply with the laws, rules and regulations of Belize, the Central Bank of Belize and our own internal policies, guidelines and procedures. We are committed to managing our relationships with Caye International Bank's regulators and standard setters in an open, transparent and co-operative manner.
- Caye International Bank and its staff strive to make full, fair, accurate, timely and clear disclosure in reports, documents or communications to regulatory authorities.
- We strive to ensure that our financial disclosure is in line with industry norms as they evolve.

## **Client Relationships: Trust, Integrity and Fairness**

We are committed to creating relationships with clients built on trust. We are committed to treating our clients fairly and with integrity. We -strive to identify and act in line with our legal and ethical responsibilities to our clients including any existing fiduciary duties.

## **Client Confidentiality**

- Caye International Bank and its staff are committed to upholding client confidentiality and protecting client information.
- We will maintain confidential any information entrusted to us by our clients, unless disclosure is authorized by our clients and/or is required by applicable laws or regulations.

- We will share information internally only with the appropriate Caye International Bank staff and will do so with complete discretion.

### **Conflicts of Interest**

Caye International Bank and its staff are committed to identifying and managing or avoiding potential conflicts of interest in its business. We are committed in avoiding any personal interest that conflict, or appear to conflict, with Caye International Bank's interest or that influences our judgment or actions in performing our duties as CIBL employees and Board Directors.

### **Preventing Money Laundering, Terrorist Financing and Corruption**

Caye International Bank and its staff are committed to assisting in the fight against money laundering, terrorism and corruption. We carry out [money laundering prevention programs](#) that seek to prevent, detect and report suspicions of money laundering, terrorism or any criminal activity. We seek to identify and know our clients and screen them to assure acceptability.

We embark on due diligence, monitoring and training of our staff to assist in the identification of suspicious activities, which are promptly escalated to management and reported to the proper regulatory authorities, the Financial Intelligence Unit.

### **Protection and Proper Use of Assets**

Caye International Bank and its staff are committed to protecting its assets and to ensure their effective use, seeking to avoid loss, theft, abuse and the unauthorized use, access or disposal of assets. We seek to observe the prohibition of employees and Board members from using their position with Caye International Bank or the bank's name, trademark, or other proprietary information for any purpose unrelated to their job responsibility.

- We seek to observe and protect intellectual and other property rights of Caye International Bank.
- We treat Caye International Bank equipment and infrastructure with care, and do not use them inappropriately for non-Caye Bank business.

### **Work Environment & Interactions between Employees**

- We expect all of its employees to be treated with dignity, their rights respected and their privacy maintained.
- We do not tolerate harassment of, or retaliations against, any person in the work place.

- Caye International Bank and its staff are also committed to maintaining safe and healthy working conditions.
- We seek to treat our colleagues with respect and work together with them based on trust and mutual support.

### **Adherence to the Code**

Caye International Bank expects its employees and Board of Directors to adhere to the spirit and letter of this Code. The Code will apply in all circumstances. Caye Bank has issued, and will issue from time to time, more specific policies, principles and procedures to implement our fundamental values and to facilitate the application and enforcement of The Code. Violations of the standards in this Code may be subject to disciplinary actions, up to and including dismissal.

In the event of any observed violations of this Code or of applicable laws, rules or regulations, or if we are uncertain how to handle a situation with regard to this Code, officers, managers, legal or Compliance or other appropriate functional experts should be involved, and should be consulted. Caye International Bank does not allow retaliation for reports made in good faith of misconduct by others.