

BRAC Bank Limited

Head Office, Anik Tower 220/B, Tejgaon Gulshan Link Road Tejgaon I/A, Dhaka 1208, Bangladesh

Phone :+88 02 8801301-32, 9884292 Fax :+88 02 9898910

SWIFT : BRAKBODH

E-mail : enquiry@bracbank.com Website: www.bracbank.com

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STATEMENT OF CONTINUED SUPPORT TO UNGC AND ITS PRINCIPLES

To our stakeholders:

I am pleased to confirm that BRAC Bank Limited reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Thank you.

Sincerely yours,

Selim R. . Hussain

Managing Director & CEO





This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

2. DESCRIPTION OF ACTIONS and MEASUREMENT OF OUTCOMES

Human Rights: Principles: 1 & 2

 Businesses should support and respect the protection of internationally proclaimed human rights.

✓ Continuous sourcing of CSR

activities which has the social

- Business should make sure that they are not complicit in human rights abuses.

Description Of Actions Supported policy/strategy **Implementation** BRAC Bank Limited (BBL) is fully committed ✓ BRAC Bank actively to upholding the principles of human rights continues to seek through its business activities and services. opportunities to develop the Through rigorous due diligence, we pledge profile of female communities. to avoid infringing the rights of others, and members to a new height. A to take steps to avoid negative human rights forum "TARA" has been impact resulting from our work. This operational since 2016 as a includes taking steps towards respect, forum for women within the protection and fulfilment for such rights as organization. Also, BBL offers a effective elimination of child labor and separate banking product modern slavery; elimination of all forms of named "Tara" as racial and gender discrimination; and the comprehensive financial realization of a workplace which positively inclusion services for the empowers its employees and people of the woman which has separate broader world without discrimination on the service desk and relationship basis of gender, physical ability. managers in each branch of the bank. 1. Bank's "Speak-up Policy" has given

Measurement of Outcomes

- Under the CSR activity is a responsible bank to promote human rights and welfare of the communities, BBL previously formed a partnership with Ain O Salish Kendra (ASK), a national legal aid and human rights organization to promote issues related to human rights especially for the children.
- Partnering with BhaatBank to Provide a Free Meal Program to the Underprivileged: BRAC Bank has partnered with BhaatBank to provide free meals to those most in need. Every Friday, they distribute 400 meals with high nutritional value to underprivileged people,

access to all employees to flag any

discrepancies or violation of rights.



- 2. BRAC bank has a well-articulated "Code of Conduct", which is an all-embracing guideline for the employees that enables them to understand the fundamental conducts of the workplace and to differentiate between what is "ACCEPTABLE" "NOT and What is ACCEPTABLE" in the workplace. Moreover, that Code of Conduct is signed by the employees to ensure that they are abiding by the bank's norms and standards.
- **3.** BBL has its own "Sexual Harassment Eradication Policy" for the betterment of the workplace
- **4.** Following issues are integral part of our HR Policy which also endorses other human rights like social security, treatment facility, recognition for outstanding contributions etc:

Cost of Living Adjustment Hospitalization Benefits Plan Hospitalization Benefits Claim Reward & Recognition

- **5.** CSR Policy: The establishment of BRAC Bank's CSR strategy is a crucial component that reflects the bank's aspiration for the sustainable development of the society and creating meaningful value for stakeholders. This means having aspiration to integrate social, environmental, ethical, human rights into its core strategy, all in close collaboration with different stakeholders.
- **6.** E&S Safeguard Policy: Board approved E&S safeguard policy of the bank as well as the credit policy includes an exclusion. According to that exclusion list, financing in Racist and anti-democratic media activities, Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements etc are strongly prohibited.

impact while promoting human rights across the country.

✓ BRAC bank conducts various awareness sessions for its employees around the year, which help employees to become adept in their personal life by stressing on soft skills too. Moreover, the bank is also focusing on educating its employees on how to conduct themselves on sensitive issues such as gender diversity and sexual harassment issues in the workplace.

especially children from two locations in the capital Dhaka.

- BBL provides Scholarships for financially challenged students mostly from rural Bangladesh with a view to reduced equality as basic human right.
- During the reporting time, BBL donated 50,000 pieces of blankets to the Prime Minister's Relief and Welfare Fund for helping the underprivileged across the country on the advent of the winter.
- 33 employee have been trained to learn more about women empowerment index and women entrepreneurship.
- BBL has been awarded the Financial Alliance for Women award in 2019 which is third in a row.
- No such incident of human right violation in the organization within the reporting timeline.
- The employees of BRAC Bank organizes its annual mini marathon "BRAC Bank DOUR 2019 The Marathon for Humanity ". Beginning in its journey in 2011, DOUR is the first marathon initiative by a bank in the country and is unique in the way it serves the society through its fundraising philosophy.



Labor- Principles: 3-6

- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
- the elimination of all forms of forced and compulsory labor
- the effective abolition of child labor; and
- The elimination of discrimination in respect of employment and occupation.

Description Of Actions

Supported policy/strategy

As part of its ethical business practices, BBL is continuously encouraging employees and working towards creating a healthy, ethical, supportive and collaborative work environment for our employees to realize their full potential - both professionally and personally as well as discouraging labor malpractice including child labor and force labor while financing any. In this regard, the policies and strategies are in place to support labor related to UNGC principles.

- 1. Credit Policy 2019: In the exclusion list of credit policy, financial activities related to forced labor or child labor are strongly prohibited. In both cases, BBL following local laws/regulations as well as the defined issues as addressed by the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art. 2).
- **2. HR Policy:** Conducting in-house operation in harmony with proper environment for the employee and propagating a culture in which our employees are deeply aware of the importance of effective recognition of the right, prohibition of forced labor etc are major part of our HR policy that includes following

Implementation

- ✓ As part of E&S due diligence while financing, loan files above a given threshold set by the central bank must go through rigorous scrutiny One of the integral parts of this due diligence is to check client's compliance with labor and working condition. That's how at the client level we make sure that our client is well compliant with labor and working condition as prescribed by local laws/regulations.
- ✓ Sustainable Finance Unit of the bank monitors and visits the client premises as part of environmental & social due diligence to oversee clients stand against force labor or child labor.
- ✓ Credit inspection team, a separate and independent team undertake random visits to the client to ensure clients adherence with occupational health and safety standards.
- ✓ BBL does not ignore, nor will it tolerate harassment or discrimination on account of race, age, sex, religion, national origin, or disability of any employee by another person in the workplace. An employee who experiences harassment or discrimination can

Measurement of Outcomes

- BBL is a values based bank with People-Planet –prosperity bottom-line.
- Credit Policy 2019: In the exclusion list of credit policy, financial activities related to forced labor or child labor are strongly prohibited. In both cases, BBL following local laws/regulations as well as the defined issues as addressed by the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art. 2).
- The bank invests heavily on skill development of its human resource, as it believes that development of the employees' professional and interpersonal endeavors is crucial to achieving its long-term strategy. In 2019, a total of 6,273 staff received different formal training programs
- 100% BBL staff are covered by health insurance, and Approximately 15% of the total staff have benefitted from hospitalization benefit in 2019.



fundamental sections like no forced or child labor, leave management, bonus, staff loan for house or transport, end of service bonus etc.

- 3. Environmental & Social Safeguard Policy 2019: This policy also endorses UNGC principle for labor and accordingly ensures any grievance mechanism for both internal and external stakeholders.
- **4.** Fire Safety Management Plan: BBL believes that ensuring the occupational health and workplace safety of its employees, visitors, service users and all relevant persons is the key essential to its motto: people, planet and prosperity. Hence, the Fire Safety Management Plan for its largest resident, its head office has been created to ensure a safe and healthy working environment for all.
- **5.** Our procurement policy provides the utmost transparency while selecting or engaging with third parties/suppliers for business purposes.

- always escalate the matter to appropriate authority for action.
- ✓ Training sessions on "Diversity, Gender and Sexual Harassment" has been adopted as mandatory session for all employees.
- ✓ For internal monitoring of the employee satisfaction against working condition, human resource departments collect employee feedback on the understanding of the HR policy and views on its effectiveness through quick survey which gives valued feedback on the matter.
- ✓ The rights, obligations, and fringe benefits of the employees are well articulated in the appointment letter, wherein the entire terms and conditions for employment are also specified.
- ✓ BBL's recruitment process is entirely based on an unprejudiced approach where competencies, merits, and other cognitive characteristics are justly assessed.
- ✓ At BBL, all employees are entitled to avail leave for any emergency and casualties as per the bank's policy. With a provision of Leave Fair Assistance (LFA), as per the guideline of Bangladesh Bank.
- ✓ All employees of the bank are covered under medical insurance scheme.
- ✓ Dedicated clinical officers is there to provide instant medical support. The bank also organizes

- In 2019, 67 female employees embarked on maternal leaves, whereas 241 male employees have availed paternity leaves.
- BBL provides Transportation facility to the female employees.
- There is a Day Care facility at the bank's head office
- To support the financial needs of its employees, the bank provides concessional loans to its staff
- In 2019, the Performance Management System (PMS) of BRAC Bank was revamped to bring symmetry and more transparency in the appraisal system.
- BBL has initiated a women's forum, TARA, for capacity-building and career development of its female staff.
- Environmental & Social Safeguard Policy 2019: This policy also endorses UNGC principle for labor and accordingly ensures any grievance mechanism for both internal and external stakeholders.
- Fire Safety Management Plan: BBL believes that ensuring the occupational health and workplace safety of its employees, visitors, service users and all relevant persons is the key essential to its motto: people, planet and prosperity.

periodical fire drill to educate its employees.	
✓ BBL has instituted counseling service for the employees where professional psychiatrist provides counselling to address mental trauma.	

Environment: Principles: 7-9

- Businesses should support a precautionary approach to environ-mental challenges;
- undertake initiatives to promote greater environmental responsibility; and
- encourage the development and diffusion of environmentally friendly technologies

Description Of Actions Measurement of Supported policy/strategy **Implementation** Outcomes 1. Environmental & Social Safeguard ✓ Online E&S due diligence ■ ESMS status for the year Policy 2019: This policy platform for centralized E&S 2019: comprehensive E&S umbrella of the bank risk assessment so Number of finance rated: that regulatory business relationship offers Low: 1023 meeting requirements, stakeholder's compliances and voluntary from remote branches of the Medium: 51 of commitments the bank country can access the Amount of environmental and social best practices. platform and raise any issues rated finance Aiming to highlight the core motto of related to this. disbursed: Bank's vision towards People Planet & ✓ Sustainable Finance Unit is Prosperity pillars, this guideline is an Low: BDT 66942.42M integral part of existing credit risk dedicatedly responsible for Medium: BDT 12076.89 M assessment framework as well as Bank's E&S Risk Management and High: BDT 824.86M BRAC Bank have designated long term vision to become a carbon neutral number one sustainable bank of Staff as "E&S Officer" for such Sustainable Finance Unit of the country. under SFU. the bank arranged 4 capacity This guideline will facilitate prudent building sessions in the year ✓ BBL's Sustainable Finance management framework of E&S risk 2019 where nearly 120 people mitigation from Bank's financial Unit regularly arrange E&S attended the sessions to learn about the E&S issues and footprints. This guideline also promotes session/awareness programs green office initiatives within the banks as for concerned business unit, global compliances like GABV 3C and UNGC principles. Also, part of its ethical business practices and credit representatives and also emphasis adopting global environmental for client base to enhance their 50 other employee attended & social standards as one of the core capacity against E&S risks and capacity building session titled "Opportunities agenda to take a stand against ever mitigation. for Green evolving climate vulnerability. These Banking and Accessing Climate policy-guidelines are established by the Finance". ✓ Market visit with business Board of Directors of BBL and Sustainable and risk management unit to Finance Unit under Risk Management sustainable Most of promote and the external Division This is designed to meet the green financing in line with communications within the organizational requirements regarding principle 9 of UNGC. bank are based on digital

environmental & social aspects that exist within the bank as well as its valued stakeholders. UNGC principles are also a part of this policy with clear directives of the responsible units and their activities.

- 2. The bank's Risk Management Committee (RMC) upholds the supreme authority to govern its Environmental & Social concerns. while the Sustainable Finance Committee (SFC) is responsible for setting up organizational strategies and disseminating the same to the Sustainable Finance Unit (SFU). The SFU of the bank is accountable for implanting the action plans set-forth by the governing bodies.
- **3.** BRAC bank is the only memberbank of Global Alliance for Banking on Values (GABV) in Bangladesh.
- **4. Credit Policy 2019:** Credit policy of the bank refers to the regulatory aspect of the bank for mitigating environmental and social risks of the organization. The policy includes exclusion list for responsible financing, E&S due diligence process as part of a precautionary approach to environmental challenges and escalation matrix for high/medium risk clients.
- **5. CSR Policy:** CSR policy of the bank ensures 10% of total annual CSR fund to be diverted as climate risk fund as per the central bank regulation.
- **6. Creation of Climate Risk Fund:** Every year, the bank puts aside a portion of its CSR budget for climate risk purposes.
- **7. GABV 3C Commitment:** March 4, 2019, Zeist, The Netherlands, following the Global Alliance for Banking on Values (GABV) Summit in Vancouver, financial leaders of GABV members including BRAC

- ✓ Inclusion of E&S covenants in loan agreement and credit inspection report to give more importance in the environmental and social precautionary approach.
- ✓ Every employee of the bank has to sign this undertaking to use less paper, efficient use of water and electricity as part of its green office guideline.
- ✓ BBL signed an agreement with International Centre for Climate Change and Development, one of the leading research and capacity building organizations working on climate change and development in Bangladesh to develop its own capacity and understanding against climate adaptation and mitigation.
- ✓ BRAC Bank's in-house chores are driven by the principles of its green office guide, which encompasses
 - 1. Green Code of Conduct for BBL staff
 - 2. Green Office Premises
 - 3. Green Technologies
 - 4. Staff Training
- ✓ To expedite resource efficiency, we use LED bulbs in our service outlets, and we have instilled motion-sensitive lights in places where there are occasional movements.
- ✓ We also discourage undue usage of paper in all possible ways, and when a printout is required, both-side printing is encouraged. Moreover, we recycle used and shredded

- format which substantially reduces paper consumption, thereby reducing deforestation.
- We have some branches located in rural and urban areas respectively have rooftop solar system as part of strategy in promoting environment friendly technologies in daily operations.
- Only bank to have a dedicated green product other than Central Bank's scheme.
- BBL partnered with IFC's Partnership for Cleaner Textile Program in Bangladesh who played a leading role in driving the long-term competitiveness and environmental sustainability of the textile wet processing sector. addressing high water, energy, and chemical use through the adoption of best practices in textile sector of the Bangladesh. These best practices lead to declining resource consumption, soaring profits, and an enhanced image in the global apparel market.
- Mobile banking & increased use of recycled paper/biodegradable materials in day to day operations.
- Increased usage of LED lights as energy efficiency initiatives to replace old T9 tube lights.
- BBL has partnered with Bangladesh Economic Zones Authority (BEZA) for tree plantation at Mirsarai Economic Zone in Chattogram. Under this financial support, massive forestation in the zone's



Bank have committed to a concerted, global effort among banking institutions to track and monitor the carbon impact of their portfolio of loans and investments within a period of three years. The Climate Change Commitment, otherwise known as the '3C initiative', reflects the dire need to correct the current environmental trajectory and aligns with the Paris Agreement goals to keep global temperature increases this century well below 2 degrees Celsius.

8. We have put in place extensive use of Green marketing and extended the use of technology to streamline processes

papers through a proper channel. Also, we have a proper disposal mechanism for the materials used in the bank's daily operation, especially for the disposal of IT wastages.

- ✓ Before proceeding for lending process, every potential loan proposal undergoes a screening process against an exclusion list.
- ✓ The bank has a rigorous Environmental & Social Due Diligence (ESDD) process, which is sternly followed in the process of extending credit facilities to its clientele.

proximity to the Bay of Bengal, covering 500 acres of land, will help protect the coastal belt as an climate adoption project as well as add to its beautification.

- BRAC bank has endorsed UNEP FI movement on EE financing,
- It is the Executing Entity (EE) of the Green Climate Fund (GCF)
- Patterned with UNGC in piloting the first-ever SME toolkit for the sustainable supply chains of the SMEs in Bangladesh.
- In an effort to minimize the death tolls caused from the brutal strikes of lightning in Rajbari district area, BRAC Bank has come up with a unique environmental initiative a palm and other tree plantation drive engaging the younger generation to fend off the harm of thunderstorms.

Anti-Corruption - Principle: 10

 Businesses should work against corruption in all its forms, including extortion and bribery

Description Of Actions

Supported policy/strategy

BRAC Bank is fully committed to anticorruption principle UNGC: of Businesses should work against corruption in all its forms, including extortion and bribery. BRAC Bank recognizes its obligation to join international governments. organizations and other financial organizations to close services financial channels used by money launderers and terrorist The bank views organizations. practicing anti-corruption as an integral part of its management strategy, rather than a mere legislative requirement. The bank is preventing fully committed to corruption, extortion and bribery.

- 1. Anti-Money Laundering Policy: BRAC Bank Limited has developed a comprehensive policy on "Money Laundering Prevention", "Combating Financing of Terrorism", and "Know Your Customer" approved by the Board of Directors. The purpose of the Anti-Money Laundering Policy is to provide a guideline within which to comply with the laws and regulations regarding money laundering both at country and international levels and thereby to safeguard the bank from potential compliance, financial and reputational risks.
- 2. BRAC bank has a full-fledged department to address Anti-money Laundering (AML) agenda with adequate staff having a adequate experience in the relevant field

Implementation

- ✓ As part of our anti-money laundering policy, every year, BRAC Bank's CEO clearly outlines to employees the way forward for the year. The CEO also reports on the initiatives taken the previous year pertaining to combating these particular areas of financial crime prevention.
- ✓ The bank has also nominated a Chief Anti-Money Laundering Compliance Officer (CAMLCO) and Deputy CAMLCO. Together, they ensure that the bank is compliant with all AML guidelines.
- ✓ In addition, the Branch Anti-Money Laundering Compliance Officer (BAMLCO) is accountable for AML compliance at each branch. The **BAMLCO** is responsible for reviewing and verifying account transactions, as making suspicious as transaction reports (STRs) and ensuring the fostering of an AMLand CFT-compliant culture.
- ✓ Before entering into a relationship with an individual or entity, detailed checks on whether the individual or entity belongs to any organization banned by the law of the land or special reference list provided by a UN sanctions list are made.
- ✓ Inconsistencies are investigated against the stated purpose of the

Measurement of Outcomes

■ The following reports are generated at prescribed frequencies to Bank's compliance with anti-corruption: Excessive Cash Movement Report: On a daily basis, every branch generates a large value cash transaction report and reviews transaction patterns.

Exception Report or TP Breach Report: On a monthly basis, every branch generates an exception report of customers whose account transaction volume exceeds the transaction limits (more than 20%) mentioned in the TP, for further review.

CTR (Cash Transaction Report): Cash transactions (deposits or withdrawals) that breach certain limits set by central bank are reported to the central bank.

- A search engine named "dedupe" is used to check for duplicate accounts or existing relationships.
- Establishment of a separate "Contact Point Verification" team which physically validates the authenticity of a customer's address and profession to avoid any probable corruption related activities.
- For every employee, attending anti-money laundering training

- 3. HR Policy: Banks HR policy clearly states zero tolerance approach against employee if he/she is involved with any sort of corruption, bribery etc resulting immediate termination and even handover to the law enforcing authority if needed.
- **4.** Stringent Know-Your-Customer Process and Contact Point Verification is in place to combat any adversity.

- accounts, i.e. the customer's declared transaction profile (TP).
- ✓ KYC procedures have been set up with address verification. As part of monitoring account transaction, the estimated transaction profile and high value transactions are being reviewed electronically.
- ✓ Training has been taken as a continuous process for creating/developing awareness among the employees.
- ✓ Transparency in procurement: BRAC bank has an unequivocal procurement policy which ensures that all its suppliers are selected through a transparent while process ensuring the quality service from the supplier along with a While competitive price. selecting suppliers for business need, the bank provides equal opportunity to them based on their quality of service and experience in relevant field.
- ✓ Monitoring & Reporting: There is a central transaction monitoring team which has been formed according to the requirement of Bangladesh Financial Intelligence Unit (BFIU) directive. Additionally, transaction monitoring is being also carried out at Branch Level under guidance of Branch Antimoney Laundering Compliance Officer (BAMLCO).
- ✓ Intensive Training Programs are being conducted throughout the year both at Head Office and

- and awareness session is a must for the bank and HR department ensures proper monitoring of this process. Besides, 36 officials of the bank undertook special training session on anti-corruption and money laundering in 2019.
- No corruption related issues or incidents related to employee were experienced during the reporting time.
- The Board Audit Committee (BAC) convened 8 times during 2019, whereas the Risk Management Committee of the directorates convened as per central bank directives during the same period. All critical issues were escalated to them for resolution.
- In 2019, BRAC bank arranged Branch Managers (BM) convention with the aim of spreading awareness among its employees and stakeholders regarding the prevention of money laundering and combating terrorism financing.
- The bank ensured regular transaction monitoring to find out any unusual transaction on the basis of available monitoring tools. In the event of any aberrant transaction, that was escalated meticulously to the authorities concerned.
- in 2019, all branches, 187, of the bank have been audited by bank's internal



Regional Offices, covering both front office and back office personnel.

- ✓ The bank conducts internal audit to ensure compliance and identify any misconduct, External audits are being conducted every year to ensure the transparency.
- ✓ While on-boarding new customers, a rigorous KYC is done. There is a separate unit viz. Central verification Unit (CVU) to cross check and validate customer information. Moreover. we relentlessly monitor the transaction profile of our customer and if any transaction deems suspicious, it is reported to the appropriate authority immediately.
- ✓ The bank has an anti-fraud committee that oversees its employees in the event of fraudforgeries. Moreover, the bank's operational risk management team conduct an awareness program in its service outlets, where they try to keep the employees abreast of the salient features of risk management

audit team, where they have conducted a comprehensive due-diligence check on the activities of the bank's branches, which enabled the bank to identify irregularities/non-

compliances in its service outlets and to chalk out appropriate action plans for the same.

- Branches of the bank had conducted periodical self-assessment exercises as part of regular due diligence to prevent money laundering and other forms of wrongdoings.
- Proper record retention, review and monitoring of highrisk accounts are strongly recommended for branches
- All employees are advised to assume responsibility to combat ML, TF and PF in all its forms and manifestation