

Code of Ethics

An employee's conduct both within and outside the workplace will affect LOLC's professionalism and reputation. Therefore, all employees must strictly abide by LOLC's code of conduct.

Professional Conduct

- Employees shall be honest, use appropriate words with other employees and clients, be punctual, dress in LOLC's uniform while working, perform duties competently and save LOLC's resources.
- 2. Employees shall abide by clients' rights, such as the right to know and understand product terms and conditions and all costs before disbursement, the right to refuse to accept any products, the right to complain or ask questions about services or products offered by LOLC, the right to receive the loan schedule and other important documents upon (or before) disbursement and official receipt during loan repayment, the right to receive fair and respectful treatment with no discrimination from LOLC's employees and the right to expect LOLC to keep personal and financial information confidential.
- **3.** Employees shall respect clients fairly and equally, with no discrimination based on political opinions, ethnicity or social standing.
- **4.** Employees shall maintain good relationships with clients. Therefore, Financial Sales Advisor's phone contact shall be available and they should be responsive.
- **5.** Employees shall read out loud to the clients the privacy clause in the contract and privacy agreement before collecting clients' data and disbursement.
- **6.** Employees shall read, understand and implement LOLC's code of conduct. Violation on the code of conduct will result in disciplinary action or termination.
- **7.** Employees have an obligation to report to Compliance Officer, Chief Operating Officer, and Independent Board Directors if they find a case of violation of the code of conduct or other polices.

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Prohibited Actions

- **1.** Employees must not misuse their position to get commission, personal benefits and doing fraud activities.
- 2. Employees must not play TONTINES at the workplace; drink liquor during working hours; use prohibited drugs; gamble or use weapons or any item that is considered illegal under the law; illegally alter documents; or be involved in any act of violence, cursing, threatening or sexual harassment of others.
- **3.** Employees must not discriminate against others based on ethnicity, color, gender, age, etc. Employees must not persecute others or commit adultery and must not view or distribute pornographic content.
- **4.** During employment with LOLC or upon and after termination of employment, employees are not allowed to disclose or use any confidential information of clients and LOLC's business to a third party without written consent, unless required by law.
- **5.** Behaviour toward clients:
 - Employees must not use inappropriate words and abusive language with clients
 who pay late. Instead, they must listen to clients' reasons and build a culture of
 mutual help and discussion. When collecting payments from clients, especially
 clients who pay late, credit officers must have discussions with clients to find
 solution and give advice to them,
 - Employees must not force clients to pay without favoring the delays of clients who are facing hardship and financial crisis,
 - Employees must not use physical force to client;
 - Employees must not limit physical freedom to client;
 - Employees must not shout at the client or enter in the client's home uninvited;
 - Employees must not publicly humiliate the client;
 - Employees must not violate the client's right to privacy;
 - Employees must not participate in corruption, kickbacks, theft with client;
 - Employees must not participate in sexual or moral harassment toward clients.

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Conflict of interest

- 1. Employees are not allowed to participate in any kind of paid activities outside LOLC including work in another company, do freelance work for another company, participate as board of directors, or in the management of other companies.
- 2. Employees are not allowed to engage directly or indirectly in any business activity that competes or conflicts with the LOLC's interest.
- 3. If staff personal/ financial interests or those of his/her spouse or children are in conflict with the interest of LOLC, staff must declare such an interest to manager and disassociate from the activity where the conflict arises.
- **4.** Staff, and their relatives, involved in the seizing process are prohibited from bidding process/ buying client collateral or assets. Information about the process and date of seizing client's collateral shall be kept confidential.
- **5.** Staff are prohibited to buy client's product/ service at a very cheap price (compared to the market price) in exchange for his/her service with LOLC.

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