



EASTERN CARIBBEAN ASSET MANAGEMENT CORPORATION

EMPLOYEE CODE OF PRACTICE AND PROFESSIONAL CONDUCT

April 5, 2019

This Employee Code of Practice and Professional Conduct outlines the required standards of behaviour and practice by employees in undertaking their role with the Eastern Caribbean Asset Management Corporation.

I, _____, have read, understand and agree to this Employee Code of Practice and Professional Conduct. I commit to the required standards of behaviour and practice as outlined in the Employee Code of Practice and Professional Conduct.

Objectives

The objectives of this Employee Code of Practice and Professional Conduct (the “Code”) are as follows:

- the establishment of an agreed set of ethical principles;
- the promotion and maintenance of confidence and trust including the protection of the good name of the EASTERN CARIBBEAN ASSET MANAGEMENT CORPORATION (the “ECAMC”); and
- the prevention of the development or acceptance of unethical practices.

Scope

This Code applies to all employees of the ECAMC from time to time.

All parts of this Code should be read carefully. employees of the ECAMC are also obliged to be fully conversant with their obligations under the Eastern Caribbean Asset Management Corporation Act (the “ECAMC Act”) and the Eastern Caribbean Asset Management Agreement (the “ECAMC Agreement”) which comprises the Schedule thereto. If there is anything you do not understand, please contact the Legal Counsel/Corporate Secretary of the ECAMC.

In this Code references to the “Corporation” means the ECAMC unless the context otherwise clearly requires.

This Code applies to employees of the ECAMC in addition to (and not to the exclusion of) other codes of practice, codes of conduct, rules and regulations that apply generally to employees of the ECAMC from time to time. It should also be noted that employees of the ECAMC are also required to comply with and adhere to such additional codes of practice as the ECAMC may issue from time to time.

The Code also sets out the “best practice” standards of principles and practice in relation to confidentiality, conflicts of interest, insider dealing, market manipulation, prohibition of rongful penalisation, disclosure of personal interests, personal account transactions and other matters in respect of which it is deemed prudent for the ECAMC to have a code of practice for.

The Code underscores the ECAMC's commitment to the highest standards of conduct and has been prepared to assist its employees in understanding their duties, rights and obligations. Employees are required to be familiar with its contents.

While it is not possible for a set of rules or guidelines to provide for all situations that may arise, the ECAMC's employees are expected to ensure that all their activities are governed by the ethical standards reflected in this Code. Accordingly, employees should be aware that the spirit as well as the precise wording of the Code should be observed. If an employee is in any doubt with regard to this Code or its application in any given situation, the precise circumstances of the situation should be notified immediately to the Chief Executive Officer of the ECAMC (the "CEO") before any action is taken that could breach this Code.

Employees must always be guided in their actions by the provisions of the ECAMC Act and any other relevant legislative and regulatory requirements, as well as by their general responsibilities to act lawfully, faithfully, competently and in the best interests of the ECAMC.

Breach of Code

Employees should note that any breach of this Code constitutes misconduct which will be investigated and dealt with in accordance with the ECAMC's procedures as set out in this Code and/or the disciplinary procedures set out in the ECAMC's Staff Handbook as appropriate. Serious breaches of this Code may constitute gross misconduct which could result in disciplinary action up to and including summary dismissal.

1. CONFIDENTIALITY

1.1. Legal and Fiduciary Obligations of Confidentiality

Each employee of the ECAMC has legal obligations of confidentiality in respect of information obtained while carrying out his or her duties on behalf of the ECAMC. There are a number of specific legislative provisions prohibiting officers of the ECAMC from disclosing information obtained in the course of their work without proper consent. However, employees of the ECAMC should note that, quite apart from their statutory duty to maintain confidentiality, they each owe a common law duty of fidelity which includes an obligation to maintain confidentiality, as well as a fiduciary obligation not to use confidential information other than for the purpose for which it was intended and not to use the information for their own personal benefit or gain.

The specific legislative provisions that employees should be aware of in respect of their duties are:

1.1.1. The ECAMC Agreement

All employees of the ECAMC are subject to Article 97 of the ECAMC Agreement, which imposes a duty not to disclose any information which has been obtained by him or her in the course of his or her duties except-

- a. for any of the purposes of the ECAMC Agreement;
- b. for the purpose of any civil or criminal proceedings under any written law;
- c. in respect of any information available to the public; or
- d. where otherwise authorised by the ECAMC Board of Directors.

Contravention of Article 97 constitutes a criminal offence, which on conviction could result a fine not exceeding two hundred thousand dollars or imprisonment for a term not exceeding three years or to both.

In cases of doubt you should consult with the head of your Department or the Legal Counsel/Corporate Secretary.

1.1.2. The Data Protection Act, 2013 of the Laws of Antigua and Barbuda (the "DPA")

The DPA deals with privacy issues arising from the collection and maintenance of personal automated data (i.e. information held on computers and other electronic formats) and personal data contained in manual records. The purpose of the DPA is to safeguard personal data processed by public bodies and private bodies in an era in which technology increasingly facilitates the processing of personal data by balancing the necessity of processing personal data and safeguarding personal data from unlawful processing by public bodies and private bodies; to promote transparency and accountability in the processing of personal data.

Under the DPA, personal data means any information in respect of commercial transactions, which—

- a. is being processed wholly or partly by means of equipment operating automatically in response to instructions given for that purpose;
- b. is recorded with the intention that it should wholly or partly be processed by means of such equipment; or
- c. is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system, that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive personal data and expression of opinion about the data subject.

The DPA defines data user as a person who either alone or jointly or in common with other persons processes any personal data or has control over or authorizes the processing of any personal data but does not include a data processor.

The DPA stipulates that processing in relation to personal data, means collecting, recording, holding or storing the personal data or carrying out any operation or set of operations on the personal data, including the—

- a. organisation, adaptation or alteration of personal data;
- b. retrieval, consultation or use of personal data;
- c. disclosure of personal data by transmission, transfer, dissemination or otherwise making available; or
- d. alignment, combination, correction, erasure or destruction of personal data;

The DPA imposes obligations on data users to take appropriate measures to protect the security of such data including ensuring that it is not put at risk of unauthorised disclosure, loss, destruction or alteration.

Employees of the ECAMC are likely to be processing personal data. Section 7 of the DPA provides that no personal data shall, without the consent of the data subject, be disclosed—

- a. for any purpose other than—
 - i. the purpose for which the personal data was to be disclosed at the time of collection of the personal data; or
 - ii. a purpose directly related to the purpose referred to in subparagraph (i);
- b. to any party other than a third party of the class of third parties as specified in section (d).

Subsection 6(d) states that a data user shall inform a data subject upon a request for personal data of the class of third parties to whom the data user discloses or may disclose the personal data.

Section 17 of the DPA goes on to provide that notwithstanding section 7, personal data of a data subject may be disclosed by a data user for any purpose other than the purpose for which the personal data was to be disclosed at the time of its collection or any other purpose directly related to that purpose, only under the following circumstances the–

- a. data subject has given his or her consent to the disclosure;
- b. disclosure –
 - i. is necessary for the purpose of preventing or detecting a crime, or for the purpose of investigations; or
 - ii. was required or authorized by or under any law or by the order of a court;
- c. data user acted in the reasonable belief that he had in law the right to disclose the personal data to the other person;
- d. data user acted in the reasonable belief that he would have had the consent of the data subject if the data subject had known of the disclosing of the personal data and the circumstances of such disclosure; or
- e. disclosure was justified as being in the public interest in circumstances as determined by the Minister responsible for public information.

Under the DPA, a person who intentionally discloses personal information of another person in contravention thereof commits an offence and is liable on summary conviction, to a fine of not more than fifty thousand dollars or to imprisonment for a term of three years; or on conviction on indictment, to a fine of not more than one hundred thousand dollars or to imprisonment for a term of not more than five years.

1.2. Disclosure of Information – Practical Guidance

The nature of ECAMC's activities may result in employees becoming privy to confidential information or commercially sensitive information either from documents or through verbal communication. **Employees shall treat all information obtained through their employment with the ECAMC as strictly confidential unless there is clear and unambiguous evidence, instruction or indication to the contrary.** Employees must only use confidential information for the lawful and proper performance of their duties. Confidential information may only be communicated to other persons within the ECAMC who understand that it is to be kept confidential and on a "need to know" basis in order for them to perform their duties. Employees may not, without authorisation, release information in respect of any aspect of the ECAMC's activities to any third party, including news media. Approval of the CEO must be sought prior to publishing any information, articles, books or letters or giving any lectures or interviews relating to or potentially relating to the activities of ECAMC. Employees are expected to act professionally and exercise due care at all times in the storage of mail, documents, and the disposal of records, whether electronic or paper.

Confidential information belonging to or in the possession of the ECAMC must never be used by an employee of the ECAMC for personal benefit or gain or to advance any personal or private interests or be communicated for any such purpose to any person within or outside the ECAMC.

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2. CONFLICTS OF INTEREST

In order to maintain public confidence, employees of the ECAMC must be seen at all times to be beyond reproach in the area of actual, potential or perceived conflict of interest situations. It is also important that employees act, and be seen to act, objectively and independently. To this end, employees should ensure that they comply with their statutory obligations with regard to actual and potential conflicts and to the principles set out in this part of the Code. In addition, employees should comply with any policies, procedures and guidance issued by the ECAMC with regard to conflicts of interest.

2.1. Fiduciary Obligations

Each employee of the ECAMC has a fiduciary obligation not to put himself or herself in a position in which his or her personal interests would conflict with, or appear to conflict with, his or her duty to the ECAMC. For example, a possible conflict situation could arise if an employee, or a member of his or her family, had interests or received personal benefits that made it difficult to perform his or her duties objectively and impartially.

2.2. Disclosure of Conflicts of Interest – General Obligations and Procedure

Should an employee find himself or herself in a position of actual or potential conflict of interest, where there may be a perception of bias or where his or her impartiality in carrying out his or her duties may be potentially affected, the employee should immediately disclose the existence of the conflict of interest in writing to the Legal Department using the Conflict of Interest Disclosure Form (Employee) (Appendix I). If the conflict involves the Legal Counsel/Corporate Secretary or, for any reason, the employee is not comfortable disclosing his or her concern to the Legal Counsel/Corporate Secretary, then such disclosure shall be made to the CEO. If the conflict involves the CEO or, for any reason, the employee is not comfortable disclosing his or her concern to either the Legal Counsel/Corporate Secretary or the CEO, then such disclosure shall be made to the Chairperson of the Human Resources Committee of the ECAMC.

Disclosures made shall be brought to the attention of the CEO within five (5) working days. The CEO shall consult with the relevant parties, internal and external to the ECAMC. Where the ECAMC receives a complaint of a conflict of interest, and the substance of the complaint has not been disclosed, the matter shall be assigned to the Legal Counsel/Corporate Secretary who shall follow the procedures set out in 3.2.1 below.

Appropriate action where an actual or potential conflict of interest arises may include a requirement that an employee cease wholly or in part to be involved in the matter giving rise to such conflict. Examples of matters that should be disclosed include:

- (a) Any conflict, or potential conflict of interest arising by virtue of any interest, shareholding, business or professional or other business relationship or other possible conflict of interest an employee has with any individual, firm, company or other entity with which the ECAMC engages in transactions of any nature or description or with which the ECAMC has any negotiations and/or dealings of whatsoever nature or description; and
- (b) Any interest of an employee's family member, of which the employee is aware, which could involve such a conflict of interest.

Material interests disclosed must be recorded in the relevant Register of Interests.

2.3. Non-Retaliation Policy

The ECAMC will not retaliate against any employee, who in good faith, reports a known suspected violation of this policy. Accordingly, employees will not be terminated, demoted or discriminated against in any way for reporting legitimate concerns about matters in accordance with this Code, including giving information in relation to an investigation. However, given the seriousness of a false allegation and the resources which will be expended to investigate complaints, the ECAMC reserves the right to discipline anyone who knowingly makes a false accusation or knowingly provides false information to the ECAMC or others.

2.4. Political Activities and Company Directorships

Employees shall not engage in any activity that could give rise to a conflict of interest or that may be detrimental to the activities or the reputation of the ECAMC. Similarly, employees may not be a member of, or otherwise involved with, a political party or other political organisations or movements.

The primary duty of loyalty of employees is to the ECAMC and any activities that conflict with this duty are prohibited. Any company directorships which employees now hold or are invited to hold at a future date must be disclosed to the Head of their Department, the CEO and the Chairperson of the Human Resources Committee. The holding of all such directorships is subject to the consent of the Board of Directors of the ECAMC. As a broad yardstick, it should be anticipated that requests for consent will be declined, particularly in the case of directorships of companies engaged in the financial services, property development or investment or the construction industry or in any related activities. The position with respect to partnerships, joint ventures, business relationships or other similar roles will be the same as for company directorships.

2.5. Personal Benefits

Employees may not directly or indirectly solicit or accept gifts, sponsorship, invitations or other benefits if it might influence, or appear to influence or compromise their objectivity in carrying out their duties or otherwise negatively affect their position or any business decision of the ECAMC.

2.6. Anti-Bribery and Anti-Corruption

As an employee of the ECAMC you must never offer or accept a bribe and must not knowingly participate in or facilitate corrupt or illegal activities.

2.7. Conflicts of Interests between Departments

The previous sections focused on personal conflicts (i.e. between employees' own personal interests and the duties they owe to the ECAMC). This section addresses another type of conflict situation that could arise in the performance of the duties and obligations of employees.

A conflict of interest could arise where the ECAMC has potentially conflicting duties to two or more parties. In this instance all parties with whom the ECAMC is dealing must be treated fairly and professionally and on no account must confidential information relating to one party be disclosed to or used for the benefit of another party or for any personal gain on the part of any employees or the ECAMC.

Due to the range of the ECAMC's activities it is possible that actual or potential conflicts of interest may arise. It is the responsibility of the CEO and senior officers within the ECAMC to ensure that actual or potential conflicts of interest that could arise are kept under review on an ongoing basis and that appropriate controls are implemented as and when required to ensure that any such conflicts that arise are managed appropriately.

2.7.1. Chinese Walls

Where there is potential for conflicts of interest to arise between or within departments, it is important that steps are taken to avoid them where possible and where they cannot be avoided to put arrangements in place to manage those conflicts. One such arrangement is a "Chinese Wall", which involves the implementation of controls and procedures to restrict the flow of sensitive information between different departments or within a specific department on a strict "need to know" basis. The ECAMC's Chinese Walls arrangements include restricted access to certain information and office areas and centralised control of access to servers and databases, which is managed by the ECAMC's IT Department.

Where specific access controls are in place to certain office areas, access is restricted to staff assigned to or directly involved in ongoing work with the relevant department. Employees are required to respect these access restrictions and those assigned to the restricted departments

should be vigilant in ensuring that access points are locked when the office area is unoccupied and where access is password controlled, under no circumstances should the password be shared with anybody outside of the business unit.

As set out in Section 1.2, employees are obliged to use the information they receive in the course of their work only for the purposes for which it is obtained and are prohibited from communicating any such information to any other department except where strictly necessary for the lawful and proper performance of their duties. This restriction on the disclosure of information also applies to areas within the same department, where an actual or potential conflict of interest has been identified within the department. Particular care should be taken not to pass on information or documents to persons who do not have systems access to the data concerned, without getting consent to do so from your line manager.

From time-to-time insider lists may be maintained in certain departments, in respect of information of a market sensitive nature, which is being handled by the department. Only persons whose names are on the insider list may be provided with the restricted information.

2.7.2. Controls on Information

In order to safeguard confidential information and, where relevant, personal data, all employees should comply with the following best practices^s irrespective of whether the Chinese Wall referred to in 2.6.1 applies directly to the employee:

- a) All commercially sensitive or confidential documents should be locked in desks or filing cabinets when not being actively used and they should not be left on desks overnight.
- b) Access to such documents should be restricted to essential personnel;
- c) Access to confidential information maintained on the ECAMC's databases or computer systems should be restricted to essential personnel;
- d) The number of copies made of any such documents should be kept to the minimum required for the business purpose and circulated only as essential on "strictly private and confidential" terms. When no longer required, additional copies should be shredded;
- e) Confidential documents that are to be destroyed must be shredded;
- f) Code names should be used for highly sensitive transactions; and
- g) Caution should be exercised in conversations (however informal) to avoid the inadvertent disclosure of information. In particular, care should be taken in public places such as bars, restaurants, elevators, on public transport and in the premises of service providers or counterparties.

3. MISCONDUCT BY EMPLOYEES OF THE ECAMC

3.1. General Duty

Employees of the ECAMC must always be guided in their actions by the provisions of the ECAMC Act as it may be amended from time to time as well as by their contractual and fiduciary responsibility to act lawfully, faithfully, competently and in the best interests of the ECAMC, without being influenced in the course of their work by any personal, unethical and/or improper consideration.

3.2. Misconduct of Employees

The following provisions shall apply with respect to the conduct of employees of the ECAMC:-

- a. Employees of the ECAMC must at all times act in the best interests of the ECAMC, act in good faith in the performance of their duties and responsibilities, conduct themselves in a professional manner and with propriety, be competent in their work, perform their duties to the standards reasonably required by the ECAMC, be faithful to the ECAMC in the course of their work and discharge their duties and responsibilities with the highest standards of integrity. Without prejudice to the generality of the foregoing, employees must not at any time permit themselves to be lobbied or engage in lobbying on behalf of any organisation, association, person, firm, company or other legal entity with respect to any matter that the ECAMC has or may have an interest in or conduct themselves in a manner that is or may be inimical to the interests of the ECAMC.

- b. If an employee of the ECAMC is convicted at any time of an offence and sentenced to a term of imprisonment or a fine or both, or has been convicted of any offence involving dishonesty, or has committed misconduct in relation to his or her duties as an employee of the ECAMC, or if the CEO is of the opinion that a material conflict of interest in relation to his or her duties as an officer of the ECAMC has arisen in relation to the employee concerned or that the employee's suspension appears to the CEO to be necessary or expedient for the effective performance by the ECAMC of its functions then in any such case or circumstance the CEO, after consultation with the Board of Directors of the ECAMC, may suspend, on such terms and conditions as he thinks fit and as prescribed by the laws of Antigua and Barbuda, such employee of ECAMC from his or her duties as an officer of the ECAMC.

- c. For the purposes of this Code the term “misconduct” means:
- i. Fraud or dishonesty of any nature or description;
 - ii. Theft or misappropriation of funds, property or other assets belonging to any other person, company or other legal entity;
 - iii. Falsification or misrepresentation of any records belonging to the ECAMC or of any company or other legal entity or person with whom the ECAMC has or proposes to have dealings for the purposes of discharging any power, duty or function assigned to the ECAMC by the ECAMC Act;
 - iv. Breach of confidentiality or violation of any non-disclosure obligation whether by using or disclosing confidential or commercially sensitive information in a manner prohibited by this Code, the provisions of the ECAMC Act and/or otherwise;
 - v. Misuse of the ECAMC’s communications equipment, systems or networks or any attempt to gain unauthorised access to another person’s e-mail account or computer files or to any restricted area of the ECAMC’s business systems or networks;
 - vi. Failing, refusing or neglecting to report evidence or reasonable suspicion of fraud, irregular practices, lack of integrity or dishonest behaviour of another employee of the ECAMC or any person with whom the ECAMC has or proposes to have dealings for the purposes of discharging any power, duty or function assigned to the ECAMC by the ECAMC Act;
 - vii. Willful breach of duty including but not limited to breach of statutory duty;
 - viii. Incapacity due to alcohol or un-prescribed drugs while at work;
 - ix. Willful violation or serious breach of this Code or any other Code of Practice and/or any Code of Conduct promulgated by the ECAMC;
 - x. Willful or serious violation of the ECAMC’s security guidelines, policies and/or procedures including without limitation any “Chinese Walls” procedures established by the ECAMC;
 - xi. Willful or gross negligence in the conduct of or in relation to the ECAMC’s activities, business or affairs;
 - xii. Being convicted of any criminal offence other than a non-arrestable offence under road traffic legislation; and / or
 - xiii. Any other activities or deliberate acts or omissions that are or could reasonably be considered by the Board of Directors of the ECAMC to be detrimental to the ECAMC’ s functions, interests or reputation.

3.2.1. The following procedures shall apply to the investigation of an employee of the ECAMC suspected of misconduct:-

- a. The CEO shall appoint such one or more persons (the “investigating officer(s)”) to carry out an investigation into any allegations, complaints or suspicions of misconduct;

- b. The investigating officer(s) will make such initial enquiries as they deem fit and then convene a hearing with the employee whose conduct is in question as well as with such other persons as the investigating officer(s) deems necessary or appropriate with a view to establishing the facts;
- c. Prior to such hearing the employee whose conduct is in question will be given details of and a summary of available evidence to support the allegations or complaints in respect of which the investigation is being conducted and a reasonable opportunity to respond;
- d. During the hearing the evidence in support of the allegations or complaints will be put to the employee whose conduct is in question and he will be given the opportunity to call any counter-evidence, and to respond and make representations;
- e. The employee of the ECAMC whose conduct is the subject of an investigation may be accompanied by a work colleague or a representative of his or her choice at the hearing;
- f. For the avoidance of doubt, natural justice will be afforded to an employee of the ECAMC whose conduct is in question before any conclusion is reached, or a finding of misconduct is made against such employee, with respect to the subject matter of the hearing;
- g. At the completion of the investigation the investigating officer(s) will furnish their report on the investigation and its conclusions to the CEO of the ECAMC who may then, in consultation with the Board of Directors of the ECAMC, suspend the employee concerned from his or her duties as an officer of the ECAMC on such terms and conditions as the CEO of the ECAMC thinks fit and in accordance with the laws of Antigua and Barbuda;
- h. For the avoidance of doubt, nothing contained in this Code shall affect or limit the right of the ECAMC to terminate at any time the employment of any of its employees provided always that such termination is in accordance with any right conferred on the ECAMC pursuant to statute, at law and/or under the applicable contract of employment; and
- i. Notwithstanding these procedures, the CEO of the ECAMC may suspend an employee at any time prior to or during an investigation.

3.3. Reporting of Offences and Other Wrongdoing

In the event that any ECAMC employee becomes aware that an offence under the ECAMC Act or any other enactment has been or is being committed, or that any provision of the ECAMC Act or any other enactment or rule of law has been or is being contravened, or that there has been other serious wrongdoing in relation to the ECAMC, the employee shall communicate this opinion to the Chairperson of the Board or the Chairperson of the Audit Committee or if the employee so wishes, to his or her manager who shall be under an obligation to communicate the employee's opinion to the Chairperson of the Board or the Chairperson of the Audit Committee.

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The Chairperson of the Board or Chairperson of the Audit Committee shall notify the relevant authority where appropriate.

3.4. Anti-Fraud Policy

The ECAMC is responsible for safeguarding the assets under its control and for taking all reasonable steps for the prevention and detection of fraud and other irregularities. In this regard, the ECAMC's employees are required to:

- a. Remain vigilant to the risk of fraud within their area of responsibility;
- b. Report any suspicion of fraud to the Head of their Department or the CEO of the ECAMC;
- c. Provide such additional information or assistance to an investigation as required; and
- d. Keep their report confidential.

The ECAMC will not accept fraud or the concealment of fraud, whether internal or external, and it is mandatory for employees of the ECAMC to report any suspicions of fraud.

3.5. Suspension for Conflicts or Expediency

The CEO, after consultation with the Chairperson of the Board of Directors of the ECAMC, may suspend, on such terms and conditions as prescribed by laws of Antigua and Barbuda and as he thinks fit, an employee of the ECAMC from his or her duties as an employee if the CEO is of the opinion that a material conflict of interest in relation to his or her duties as an employee of the ECAMC has arisen in relation to the employee concerned or that the employee's suspension appears to the CEO to be necessary or expedient for the effective performance by the ECAMC of its functions. For the avoidance of doubt, a suspension by reason of the CEO forming any such opinion shall not require compliance with or adherence to procedures of the kind specified in paragraph 3.2.1 of this Code; provided always that the CEO shall, before imposing a suspension on the basis of his or her opinion as aforesaid, make such enquiries as he considers reasonable and shall also in all cases hear what the employee has to say with respect to any suspected or stated conflict of interest, necessity or expediency before imposing a suspension under this sub-paragraph 3.5.

4. MISCELLANEOUS

4.1. Social Media Policy

Employees are not permitted to establish any presence on social media on behalf of the ECAMC or to alter any approved presence unless expressly authorised to do so. Only persons expressly authorised by the CEO may be, may make postings on social media for and on behalf of the ECAMC relating to their respective business practices, activities or procedures. No employee may discuss or post or comment on information regarding the business practices, activities or procedures of the ECAMC on social media, nor should they make any postings which might be perceived to relate to the business practices, activities or procedures of the ECAMC whether during or outside working hours.

4.2. IT Security and Internet and Email Usage

Employees must comply with the ECAMC's IT security policies and procedures, including internet and email usage.

4.3. Right to Update

The ECAMC reserves the right to update, add to and/or amend the provisions of this Code, and introduce additional codes of practice, at any time.

4.4. Understanding the Code

Employees of the ECAMC are expected to ensure that they read and understand this Code and all updates, additions or amendments introduced from time to time.

4.5. Captions

Captions used in this Code are for ease of reference only and shall not affect the interpretation of its provisions.

I, _____, have read, understand and agree to this Code. I commit to the required standards of behaviour and practice as outlined in the Code.

[Insert Name of Employee]

Date

Witness

APPENDIX I
CONFLICT OF INTEREST DISCLOSURE FORM
(EMPLOYEE)

Date: _____

Name: _____

Position: _____

Please describe below any interest, relationships, transactions, positions held (volunteer or otherwise), or situations current, proposed or pending, that you believe could contribute to a conflict of interest between the Eastern Caribbean Asset Management Corporation (the "ECAMC") and your personal interests, financial or otherwise:

I may have the following conflict of interest to report (Append additional information as needed)

- 1.
- 2.
- 3.

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Employee Code of Practice and Professional Conduct of the ECAMC.

Date: _____

Signature: _____

Staff Member

For Legal Department's Use Only

Date Received in LD: _____ Signature: _____